

**DEC 22 2008**

**STATE OF ILLINOIS  
Pollution Control Board**

December 18, 2008

John Therriault  
Illinois Pollution Control Board  
James R. Thompson Center  
100 W. Randolph Street, Suite 11-500  
Chicago, IL 60601

PC# 24

**Re: R08-17, Proposed Standards and Limitations for Organic Material  
Emissions for Area Sources (35 Ill Adm. Code 223; 32 Ill Reg. 17301)**

Dear Illinois Pollution Control Board Members,

The Chemical Industry Council of Illinois ("CICI") would like to register its voice in support of the National Paint and Coatings Association's (NPCA) request of the change of the implementation date. CICI is a statewide trade association representing the chemical and the paint industry in Illinois. CICI has 198 member companies employing over 49,000 workers in 726 manufacturing facilities and 877 wholesale and distribution facilities in Illinois.

NPCA's request to extend the implementation date of the architectural and industrial maintenance (AIM) coatings rulemaking from January 1, 2009 to July 1, 2009 will allow the state of Illinois adequate time to finalize and adopt the amendments to the AIM rule, and more importantly, provide adequate time for industry to make necessary changes in order to comply with the amendments.

Since the 1<sup>st</sup> Notice comments are not due until December 22, 2008 and the proposed rule will need to be sent to JCAR for 2<sup>nd</sup> Notice, this does not allow enough time for the state of Illinois to meet the set implementation date of January 1, 2009 for finalization of the rule. It seems reasonable then to allow for both the state and industry the time to ensure that the implementation of the proposed rule will occur smoothly.

It is therefore that CICI supports the NPCA's petition designated R08-017.

Respectfully submitted,



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Chemical Industry Council of Illinois

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