



9301 West 55th Street
LaGrange, IL 60525 USA

4 June 2010

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

Re: Comment on Rulemaking 10-20: Proposed Amendments to 35 Ill. Adm.
Code 211, 218, & 209

Dear Sir or Madam:

Electro-Motive Diesel (EMD) located in Cook County would like to take this opportunity to provide a comment regarding proposed amendments to 35 Ill. 211, 218, & 219 as put forth in Rulemaking 10-20.

We note that the existing 35 IAC 218.204(j) Miscellaneous Metal Parts and Products Coating includes a general category under (j)(1) for "Clear coating". After May 11, 2011, coating lines subject to this regulation will need to comply with 35 IAC 218.204(q). Yet, the only "Clear coating" category in (q) of the proposed amendments is at (q)(1)(AA) "Marine engine coating". The exclusion of a "Clear coating" category in (q) will greatly affect future paint coating needs at our facility in McCook, Illinois.

EMD suggests to the Board that a category labeled "Clear coating" be added to 35 IAC 218.204(q)(1)(A) "General one component coatings" to be consistent with the existing 35 IAC 218.204(j)(1). EMD proposes the following language under section 35 IAC 218.204(q)(1)(A):

Add the following Category:

A) General one component coatings

	<u>kg/l</u> <u>(lb/gal)</u> coatings	<u>kg/l</u> <u>(lb/gal)</u> solids
Clear coating:	<u>0.52</u> <u>(4.3)</u>	<u>1.24</u> <u>(10.34)</u>

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If this addition to the "General one component coating" category is not possible, EMD requests that the Board consider adding a "Clear coating" category to 35 IAC 218.204(q)(1) as follows:

CC) Diesel-Electric Locomotive Coating Lines in Cook County	<u>kg/l</u>	<u>kg/l</u>
	<u>(lb/gal)</u>	<u>(lb/gal)</u>
	coatings	solids
Clear coating:	<u>0.52</u>	<u>1.24</u>
	<u>(4.3)</u>	<u>(10.34)</u>

If IPCB requires any additional information regarding this suggestion, please contact me at 708-387-5904 or Jay Shaffer at 708-387-6690.

Sincerely,



John Kaps

Environment and Energy Group

cc: Mr. Jay Shaffer, Electro-Motive Diesel