

W. R. MEADOWS, INC.

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November 14, 2008

John Therriault, Chief Clerk
Clerk's Office
Attention Docket #R09-08
Illinois Pollution Control Board
100 W. Randolph, Suite 11-500
Chicago, Illinois 60601

PC #1

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STATE OF ILLINOIS
Pollution Control Board

RE: Illinois EPA Architectural and Industrial Maintenance (AIM) Coatings;
Docket #~~R09-08~~ R08-17

Dear Mr. Therriault:

W.R. MEADOWS, INC. is a manufacturer of architectural coatings utilized in the commercial concrete construction market and has a manufacturing operation in Hampshire, Illinois.

W.R. MEADOWS, INC. is a member of the National Paint & Coatings Association (NPCA) and supports NPCA's request to extend the implementation date of the AIM rulemaking from January 1, 2009 to July 1, 2009 to allow 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.

With the new AIM amendments, in addition to changing thousands of formulations, paint manufacturers will need to develop and print new labels for the reformulated products. Further, computer systems and other "lock-out" systems need to be upgraded to prevent shipment of "non-compliant" products into Illinois. In addition, it will take significant time for manufacturers to properly communicate the new VOC limits to all distributors, customers, and specifiers in order to ensure their compliance with the new products. It is impossible for manufacturers to make these necessary changes and properly communicate the details of the Illinois AIM rule without having a final adopted rule in hand, particularly, as additional changes may occur between now and the final adoption. Therefore, W.R. MEADOWS, INC. strongly believes that the implementation date must be moved to July 1, 2009.

Thank you for your consideration of our request. If you have any questions or require additional information please contact me at (847) 214-2232.

Sincerely,

Dave Carey, CHMM, Vice-President Plant Operations

CC: Jim Dwyer, Matt Price, Harry Meadows, Brent Weber, Dave Duewel