



Mostardi Platt
Environmental

RECEIVED
CLERK'S OFFICE
APR 09 2010
STATE OF ILLINOIS
Pollution Control Board

1520 Kensington Road, Suite 204
Oak Brook, Illinois 60523-2139
Phone 630-993-2100
Fax 630-993-9017
www.mostardiplattenv.com

April 8, 2010

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

ORIGINAL

R10-8
PC#4

RE: RACT for VOM from Group II Consumer & Commercial Products: Proposed Amendments to 35 IAC 211, 218, and 219

Dear Mr. Therriault,

As a Chicago area consulting firm that provides environmental compliance assistance to several printing and coating operations within the State of Illinois, we hereby submit the following comments on the pending amendments to the Parts 211, 218, and 219 (Title 35, IAC) regulations. We understand that the rule changes are in the final process of approval. We would like our comments to be included as part of the record, and hope that they are considered prior to taking final actions on the above referenced regulatory amendments.

In the proposed amendments to parts 218 and 219 there are several locations where the stated compliance date is listed as May 1, 2010. We are not providing specific reference to each occurrence of this compliance date. Rather, this comment applies globally to each occurrence. We believe that the timing for the completion of the rule making process will most likely be after the proposed compliance date. We believe that the Board should consider an alternative compliance date. Considering the length of time that has passed since the proposed rule making began, it may have been the intention of the Agency to build in an adequate amount of time for subject sources to comply with these rule changes. However, it appears that the rule making process will not be complete by the proposed compliance date for the various sections of Part 218 and 219.

The adjusted date of compliance should allow time for sources to meet the new rule when it is finalized. As the proposed rule amendments stand (Illinois Register dated February 5, 2010), the sources that are subject to the various sections in the rule with a compliance date of May 1, 2010, will have to be in compliance with the amended Parts 218 and 219 most likely the day that these rule changes become effective.

Thank you for considering these comments.

Sincerely,

MOSTARDI PLATT ENVIRONMENTAL

Timothy Kinsley
Senior Consultant

Rich Trzupek
Principal Consultant

Lauren Laabs
Principal Consultant