

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:

RACT Deficiencies -
Amendments to 35 Ill. Adm.
Code Parts 211 and 215

)
)
)
)
)

R 89- 16

9/29/89

STATEMENT OF REASONS

Pursuant to 35 Ill. Adm. Code Section 102.120(b), the Illinois Environmental Protection Agency ("IEPA") hereby submits to the Illinois Pollution Control Board ("Board") a statement of reasons in support of the attached proposal of regulations.

I. STATUTORY AUTHORITY

IEPA cites the following sections of the Clean Air Act (42 USCS par. 7401 et seq (1983)) in support of the federally required rule status of the regulatory package: Section 110, Section 110(a)(2)(h)(ii), Section 172(b)(2), Section 172(b)(5) and Section 172(b)(8). Section 28.2 of the Illinois Environmental Protection Act (Ill. Rev. Stat. 1987, chapter 111 1/2, par. 1028.2) contains the definition of a federally required rule and the procedures of the Board in required rule proceedings. Please see the attached Certification for a more detailed statutory authority analysis.

II. REGULATORY DEVELOPMENT

IEPA will hold a regulatory development presentation on September 29, 1989, at the Air Division Offices for interested parties. It is the purpose of this meeting to foster greater understanding of the proposed regulations and to allow comments from industry and public interest groups as well as interested citizens. Due to the extreme time constraints in the development of this regulatory package, IEPA was not able to invite comments and suggestions regarding its development prior to filing the proposal with the Board.

III. DESCRIPTION OF THE PROPOSAL

A. Deficiency #1 - Surface Coating Exemption

Revised Section 201.146(g) eliminates the exemption from permit requirements for painting lines using 5,000 gallons per year or less at facilities in the state that will be subject to the coating requirements in Part 215, Subpart F. The same change is made for coating operations subject to Subpart PP.

Revised Sections 215.206(a) and 215.206(b) pertain to the counties of Cook, DuPage, Kane, Lake, McHenry, Will, Macoupin, Madison, Monroe and St. Clair for coating categories other than wood furniture coating.

Revised Section 215.206(a) reduces the exemption for the different RACT (Reasonably Available Control Technology) categories of coating lines from 25 T/yr for the coating plant to 15 lb/day for each RACT grouping of coating lines.

Revised Section 215.206(b) states that any coating line that has ever been subject to the limitations of Section 215.205 cannot use reductions in emissions to qualify for the exemption under Section 215.206(a).

OK
Current Section 215.206(a)(3) is deleted since National Can Corporation is no longer operating in Loves Park, Illinois.

New Section 215.206(d) is added to continue the current 25 T/yr exemption level for wood furniture coating facilities in the state. The requirement that emissions be limited by an operating permit is deleted. The exemption is also altered by the addition of a provision that a wood furniture coating plant will continue to remain subject to Subpart F in Cook, DuPage, Kane, Lake, McHenry, Will, Macoupin, Madison, Monroe, and St. Clair Counties once it becomes subject to this Subpart.

New Section 215.211(d) is added to allow newly subject facilities one year from the date of adoption to achieve compliance with the regulations.

B. Deficiency #4(a) - Fabric Coating Definition

The revised statewide definition of "Fabric Coating" in Section 211.122 clarifies that coating operations include saturation of the substrate.

C. Deficiency #4(b) - Paper Coating Definition

The revised statewide definition of "Paper Coating" in Section 211.122 clarifies that coating operations include saturation of the substrate.

D. Deficiency #4(c) - Transfer Efficiency Definition

The revised statewide definition of "Transfer Efficiency" in Section 211.122 changes the transfer efficiency calculation from a total coating volume basis to a coating solids basis.

E. Deficiency #4(d) - Coating Definition

Revised Section 211.122 specifies a new statewide definition for "Coating" that includes materials applied to a substrate for decorative, protective or other functional purposes. This section also changes the statewide definition of "~~Can~~ Coating", "~~Coating~~", "~~Coil~~ Coating", "~~Large~~ Appliance Coating", "~~Prime~~ Coat", "~~Prime~~ Surface Coat", and "Topcoat" so they are consistent with the definition of coating and to clarify that coating operations include saturation of the substrate. Finally, revised Section 215.104 changes the definition of "Furniture Coating Application" so that it is consistent with the definition of coating in Section 211.122.

F. Deficiency #4(e) - Vinyl Coating Definition

Revised Section 211.122 changes the definition of "Vinyl Coating" to exclude organosols and plastisols.

G. Deficiency #4(f) - Automobile or Light Duty Truck Refinishing Definition

"Automobile or Light Duty Truck Refinishing" is added in Section 211.122 to indicate that the term includes the repainting of used automobiles or light duty trucks. This term, as used later in the definition of "Miscellaneous Metal Parts and Products", only applies to the repainting of used automobiles or light duty trucks.

H. Deficiency #9 - Test Methods

Introduction - Test methods and procedures define the manner in which measurements to determine compliance with an emission limit or other control requirement shall be conducted. Provisions addressing testing are found throughout Part 215. In order for test measurements to be consistent and reliable, the methods and procedures for testing should be well-defined, standardized, and up-to-date. Numerous changes are proposed to accomplish this objective.

~~1. Section 211.122 Definition of Alternative Test Method~~

~~A new definition for "Alternative Test Method" is proposed for inclusion in Section 211.122. This term is used in and supports Section 215.208, Testing Method for Volatile Organic Material Content. The new definition is derived from USEPA's definition of "Alternative Method" for New Source Performance Standards, 40 CFR 60.2, and describes a test method~~

which in a particular case is adequate to determine compliance.

2. Section 211.122 Volatile Organic Material Content

A new definition for "Volatile Organic Material Content" is proposed for inclusion in Section 211.122. This term is used in and supports the following sections dealing with the volatile organic material content of substances: Sections 215.208, 215.409, 215.467 and 215.614. The volatile organic content of a coating or similar material is defined as the emissions of volatile organic material which would result from the use or release of the material without control equipment.

3. Sections 215.102(a) Testing Methods for Volatile Organic Material Emissions

Section 215.102(a) is revised to provide current methods for testing organic material and volatile organic material emissions. The section is expanded to include measurement of vent flow rate as well as concentration to address emissions in quantitative terms, i.e., kg/hour. The accepted methods for measurement are all USEPA methods. This section is referenced by Section 215.127(a), 215.410(a), 215.464(a), 215.585(a), 215.615(a) and 215.886(a).

4. Section 215.105 Incorporations by Reference

Section 215.105 is revised to update the edition or issuance date of certain materials incorporated by reference and to add three new items: American Society for Testing and Materials Methods D2504-83, D2382-83 and D4457.

5. Section 215.122 Loading Operations (Deletion of Equivalent Control Requirements)

This section provides general requirements for loading of organic liquids into transport vehicles and storage tanks. (Handling of gasoline

is addressed further in Subpart Y and handling of liquids in certain manufacturing operations is also addressed in various subparts). The section is revised to eliminate the Agency's authority to approve equivalent control measures which are not specifically identified in the rule. Appropriate test methods and procedures can only be provided for the specific emission limitations and control requirements identified in the section.

In addition, submerged fill (also known as bottom loading) has been specifically identified as an acceptable control measure. It is commonly accepted as being identical in effect to the use of a submerged loading pipe.

Similar changes are also proposed to the following sections to eliminate equivalent control requirements for which test methods cannot be specified:

- . Section 215.124(a)(1) and (b)(3) - Equivalent control for external floating roof tanks
- . Section 215.241(c) - Equivalent control for external floating roof tanks in major urbanized area
- . Section 215.601(a) - Equivalent control for a perchloroethylene dry cleaning facility
- 6. Section 215.124(a)(2)(B) and (a)(6), and Section 215.128 Testing of External Floating Roof Tanks (Deletion of Test Procedures as "Approved by the Agency")

Sections 215.124(2)(B) and Section 215.124(6) address seal gap requirements for external floating roof tanks. The proposed revision deletes the use of unspecified procedures as "approved by the Agency" for determination of compliance. A new section, Section 215.128, is proposed

to provide a specific compliance method. This new method was adopted by USEPA for its New Source Performance Standard, 40 CFR 60, Subpart Kb.

Similar changes are proposed to the following sections to eliminate test procedures as "approved by the Agency":

- . Section 215.124(a)(8) External Floating Roof Tanks
- . Section 215.208(a) Testing Methods for Solvent Content (Coating Operations)
- . Section 215.447(a)(1) and (2) Monitoring Program for Refinery Leaks
- . Section 215.464(a) Emissions Testing for Rubber and Miscellaneous Plastic Products
- . Present Section 215.582(b)/Proposed Section 215.585(a) Emissions Testing for Bulk Gasoline Terminals
- . Section 215.603(c) Emissions Testing for Perchloroethylene Dry Cleaners

7. Section 215.124(a)(8), Section 215.127(b), and Section 215.128(b) Testing of External Floating Roof Tanks (Request by the Agency for Testing)

Present Section 215.124(a)(8) provides for formal demonstration of compliance by testing for an external floating roof tank, upon a reasonable request by the Agency. The present provision is proposed to be deleted, and replaced by paragraph (b) in new Section 215.127 and Section 215.128. These proposed sections will address test methods and procedures. The wording of the new paragraph only addresses a request by the Agency for a formal demonstration of compliance by testing. It does not address the method of testing or other means by which compliance or noncompliance may be determined.

Essentially identical wording is proposed for the following sections which address test methods and procedures:

- . Present Section 215.404(a)/Proposed Section 215.410(b) Emissions Testing for Printing and Publishing
- . Present Section 215.464(a)/Proposed Section 215.464(b) Emissions Testing for Rubber and Miscellaneous Plastic Products
- . Section 215.585(b) Emissions Testing for Gasoline Distribution Facilities
- . Section 215.615(b) Emissions Testing for Dry Cleaners
- . Section 215.886(b) Emissions Testing for Polystyrene Plants
- 8. Section 215.124(a)(8), Sections 215.127(c) and 215.128(c) Testing of Storage Tanks (Advance notice to the Agency for testing)

Present Section 215.124(a)(9) requires advance notice to the Agency for emissions testing to demonstrate compliance with Section 215.124 and Section 215.123. The present provision is proposed to be deleted. It is to be replaced by paragraph (c) in new Sections 215.127 and 215.128, these proposed sections address test methods and procedures. The new paragraph addresses any tests or measurements conducted to demonstrate compliance with Part 215 Subpart B, which includes control requirements in Sections 215.121 through 215.124.

Essentially identical wording is proposed for the following sections which address test methods and procedures:

- . Section 215.410(c) Emissions Testing for Printing and Publishing
- . Section 215.464(c) Emissions Testing for Rubber and Miscellaneous Plastic Products
- . Section 215.585(c) Emissions Testing for Gasoline Distribution Facilities
- . Section 215.615(c) Emissions Testing for Dry Cleaners

9. Section 215.127(a) Emissions Testing for Storage and Loading Operations (Addition of emission test methods)

Part 215 Subpart B includes requirements for use of vapor recovery systems and control devices (Sections 215.121(b)(2); 215.122(b); and 215.123(a)(1) and (b)(1)). A new section is proposed, Section 215.127, to provide current test methods and procedures for determination of compliance with these requirements. The test method is provided in paragraph (a), which refers to Section 215.102(a).

Similar changes are proposed in the following sections to add current organic material or volatile organic material emissions test methods:

- . Section 215.410(a) Emissions Testing for Printing and Publishing
- . Section 215.464(a) Emissions Testing for Rubber and Miscellaneous Plastic Products
- . Section 215.585(a) Emissions Testing for Gasoline Distribution Facilities
- . Section 215.615(a) Emissions Testing for Dry Cleaners
- . Section 215.886(a) Emissions Testing for Polystyrene Plants

10. Section 215.208(a) Testing Methods for Volatile Organic Material Content for Coatings (Test method for volatile organic material content)

Section 215.208(a) in Subpart F, Coating Operations is revised to specify current test methods for determination of volatile organic material content of various materials. The accepted methods are USEPA Method 24A for printing inks and USEPA Method 24 for other materials. An alternative test method may be used for certain materials other than inks if Method 24 is shown not to be representative and an alternative method is demonstrated to be both representative and accurate.

Similar changes are proposed to the following sections to provide test methods for the volatile organic content of materials:

- . Section 215.409 Volatile Organic Material Content for Printing and Publishing
- . Section 215.467 Volatile Organic Material Content for Rubber and Miscellaneous Plastic Products
- . Section 215.614 Volatile Organic Material Content for Dry Cleaning
- 11. Section 215.404 Testing and Monitoring for Printing and Publishing (Absence of monitoring provisions)

Present Section 215.404 is proposed for deletion as it does not address monitoring. New Section 215.410, as already discussed, replaces Section 215.404 as it addressed emission testing.

Similar changes are proposed to the following sections:

- . Section 215.464 Emission Testing for Rubber and Miscellaneous Plastic Products
- . Section 215.610 Emission Testing for Dry Cleaners
- . Section 215.886 Emission Testing for Polystyrene Plants
- 12. Section 215.421 General Requirements for SOCOMI Leaks (Test method for volatile organic material leaks)

Section 215.421 is revised to specify the current test method for determination of whether a component is leaking. The accepted method is USEPA Method 21. For clarity, this method has been made into a separate paragraph, Section 215.421(b).

Similar changes are made to Section 215.445 Leaks for Petroleum Refineries.

- 13. Section 215.584(a)(6) Pressure-vacuum test method for Gasoline Delivery Vessels

Section 215.584(a)(6) is proposed to be revised to specify the current method for pressure-vacuum testing of delivery vessels. The accepted method is USEPA Method 27.

14. Section 215.601(b) and (g) Perchloroethylene Dry Cleaners
Section 215.601(b) and (g) are revised to clarify control requirements, so that compliance may be determined using specified methods for testing of emissions.

15. Section 215.602 Perchloroethylene Dry Cleaners - Exemptions
Section 215.602 is revised to clarify the exemption provisions by stating the exemption level only on a monthly basis. The exemption is also altered by the addition of a provision that an emission source will continue to remain subject to Section 215.601 once it becomes subject to it.

A related change is proposed to Section 215.606, Exception to Compliance Plan for Perchloroethylene Dry Cleaners.

16. Section 215.603 Perchloroethylene Dry Cleaners - Leaks
(Inappropriate procedures for determination of compliance)

Section 215.603, previously entitled "Testing and Monitoring" is proposed to be revised to address only leaking components. Other provisions are proposed for deletion, as they inappropriately circumscribe the means by which compliance may be determined. For example, the determination of the proper design and functioning of a carbon adsorption system, as required by Section 215.601(a), may entail review of equipment specifications, operating procedures, solvent purchase and other operating records, as well as a simple visual inspection of the equipment itself.

Similar changes are proposed to Section 215.610 Compliance Procedures for Petroleum Solvent Dry Cleaners.

I. Deficiency #11 - Petroleum Refinery Monitoring Program for Leaks

Revised Section 215.447(b)(1) removes the present exemption from leak monitoring requirements for inaccessible valves at petroleum refineries statewide.

New Section 215.447(b)(2) provides for inaccessible valves at petroleum refineries statewide to be tested at least once each calendar year. Refineries must provide an identification of these valves and a reason why these valves are inaccessible. Any valve not identified under this section falls instead under the normal monitoring program for leaks given in Section 215.447.

J. Deficiency #13 - Bulk Gasoline Plant Exemption

Revised Section 215.581(e)(2) changes the statewide exemption level of 350,000 gallons per year for "load in" vapor balance systems (Stage I) at bulk gasoline plants throughput to 4000 gallons per day as determined by a 30 day running average.

Revised Section 215.581(f)(1) changes the applicability level for throughput for "load out" vapor balance systems (Stage I) at bulk gasoline plants from 1,000,000 gallons per year to 4000 gallons per day as determined by a 30 day running average. The rule will apply to bulk plants that either (1) distribute gasoline to gasoline dispensing facilities requiring load in vapor balance (Stage I) or (2) are located in Boone, Cook, DuPage, Kane, Lake, Madison, McHenry, Peoria, Rock Island, St. Clair, Tazewell, Will or Winnebago counties.

New Section 215.581(h) provides that newly subject bulk gasoline plants will have one year from the date of adoption of the revised sections to achieve compliance.

New Section 215.581(i) adds a provision that a bulk gasoline plant will continue to remain subject to Section 215.581 once it becomes subject to this section.

K. Deficiency #15 - Solvent Metal Cleaning

Revised Section 215.181 removes the exemptions from control and operating requirements for cold cleaners, open top vapor degreasers and conveyORIZED degreasers for the counties of Cook, DuPage, Kane, Lake, McHenry, Will, Macoupin, Madison, Monroe and St. Clair.

New Section 215.186 allows newly subject cold cleaners, open top vapor degreasers and conveyORIZED degreasers one year to achieve compliance from the date of adoption of revised Section 215.181.

L. Deficiency #17 - Generic Rule

Introduction - The "Generic Rule" provides control requirements for certain sources for which the United States Environmental Protection Agency has not published Control Technology Guidelines (CTG) describing RACT. These non-CTG rules apply to four categories of process emission sources, not otherwise regulated by Part 215:

Subpart AA - "Paint and Ink Manufacturing"

Subpart PP - "Miscellaneous Fabricated Product Manufacturing Processes"

Subpart QQ - "Miscellaneous Formulation Manufacturing Processes"

Subpart RR - "Miscellaneous Organic Chemical Manufacturing Processes"

These rules apply to emission sources in the following counties: Cook, DuPage, Kane, Lake, McHenry, Will, Macoupin, Madison, Monroe, and St. Clair.

1. Subpart AA

Subpart AA sets forth applicable VOM control requirements for the Paint and Ink Manufacturing Processes.

To determine the applicability of Subpart AA to a particular plant, the "uncontrolled" VOM emissions from process emission sources not regulated by RACT as addressed by a CTG must be determined. If these are 100 tpy or more, a paint or ink manufacturing plant meets the applicability determination of the Generic Rule. The proposed revision to Section 215.620(b)(1) alters the treatment of Part 215 Subparts N, U, and Section 215.408 to treat them as non-CTG rules. Thus, the emissions from any emission source subject to the above referred to sections would contribute to the determination of whether non-CTG emissions at a plant are 100 tpy or more.

New Section 215.626(a) requires use of pressure/vacuum conservation vents on tanks storing volatile organic liquid with a vapor pressure greater than 1.5 psi at 68F.

New Section 215.626(b) requires a submerged-fill pipe or bottom fill for stationary volatile organic liquid storage containers with a capacity greater than 250 gallons.

New Section 215.636(b) provides that newly subject paint and ink manufacturing plants will have one year from the date of adoption of the revised sections to achieve compliance.

2. Subpart PP

Subpart PP sets forth applicable VOM requirements for Miscellaneous Fabricated Product Manufacturing Processes.

Revised Section 215.920(b) alters applicability provisions for

Miscellaneous Fabricated Product Manufacturing Processes in a similar manner to that already discussed for Section 215.620(b)(1) above.

Current Section 215.920(d)(2) is proposed for deletion. Without this rule, emission sources subject to the limits in 35 Ill. Adm. Code 230, 35 Ill. Adm. Code 231, the Lowest Achievable Emission Rate pursuant to 35 Ill. Adm. Code 203, Best Available Control Technology pursuant to 40 CFR 52.21 (1987), or Section 9.4 of the Act will now be subject to control requirements of Subpart PP if other applicability criteria are met.

Section 215.920(e) provides that an emission source would only be considered regulated by a CTG rule if it is actually subject to control requirements of the CTG rule. Thus emission sources which are below the size, throughput, or emissions criteria, or meet a specific exemption of a CTG rule will now be considered in determining whether a plant's non-CTG emissions are 100 tons/year or more.

New Section 215.926(b)(2) provides that newly subject emission sources will have one year from the date of adoption of the revised sections to achieve compliance.

New Section 215.928 specifies the methods and procedures to be followed in the testing of volatile organic material emissions.

New Section 215.929 specifies the testing method for the volatile organic material content of coatings.

3. Subpart QQ

Subpart QQ sets forth applicable VOM requirements for Miscellaneous Formulation Manufacturing Processes.

Revised Section 215.940(b) alters applicability provisions for Miscellaneous Formulation Manufacturing Processes in a similar manner to that already discussed for Section 215.620(b)(1) above.

Present Section 215.940(d)(2) is deleted to eliminate the exclusion from requirements for certain emission sources, as already discussed for Section 215.920(d)(2) above.

Revised Section 215.940(e) alters applicability provisions, as already discussed for Section 215.920(e) above.

Revised Section 215.946(b)(2) gives newly subject emission sources one year to achieve compliance from the date of adoption of the revised sections.

New Section 215.948 specifies the methods and procedures to be followed in the testing of volatile organic material emissions.

4. Subpart RR

Subpart RR sets forth applicable VOM requirements for Miscellaneous Organic Chemical Manufacturing Processes.

Revised Section 215.960(b) alters applicability provisions for Miscellaneous Organic Chemical Manufacturing Processes in a similar manner to that already discussed for Section 215.620(b)(1) above.

Present Section 215.960(d)(2) is deleted to eliminate the exclusion from requirements for certain emission sources, as already discussed for Section 215.920(d)(2) above.

Revised Section 215.960(e) alters applicability provisions, as already discussed for Section 215.920(e) above.

New Section 215.966(b)(2) gives newly subject emission sources one year to achieve compliance from the date of adoption of the revised sections.

New Section 215.968 specifies the methods and procedures to be followed in the testing of volatile organic material emissions.

M. Deficiency #18 - SOCFI Inspection

In the counties of Cook, DuPage, Kane, Lake, McHenry, Will, Macoupin, Madison, Monroe, and St. Clair, revised Section 215.432 requires annual monitoring of those components that would require the elevation of monitoring personnel more than two meters above a permanent support surface.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

By: *Susan J. Schroeder*
Susan J. Schroeder, Attorney

By: *Deborah A. Stonich*
Deborah A. Stonich, Attorney

DATED: September 28, 1989

2200 Churchill Road
P.O. Box 19276
Springfield, Illinois 62794-9276
(217)782-5544

RC:mab/536K/sp/1-17

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:

RACT DEFICIENCIES -
AMENDMENTS TO 35 ILL.
ADM. CODE PARTS 211 and 215

)
)
) R89- 16
)
)

LIST OF JUSTIFICATION DOCUMENTS

The following documents listed as justification in Table 1 of the Certification are attached to this regulatory package:

- SIP call letter to Michael J. Hayes, from David Kee, dated June 17, 1988 ("SIP Call Letter")
- Issues Relating to VOC Regulations Cutpoints, Deficiencies and Deviations: Clarification to Appendix D of November 24, 1987 Federal Register, dated May 25, 1988, by the Ozone/Carbon Monoxide Program Branch of the Air Quality Management Division Office of Air Quality Planning and Standards ("Blue Book")
- June 9, 1989 Memorandum from G.T. Helms, Chief Ozone/Carbon Monoxide Programs Branch (MD-15) to Chief, Air Programs Branch Regions I-IV, VI-X: Chief, Air and Radiation Branch Region V; Chief, Air Compliance Branch Regions IV-V, Chief, Air Enforcement Branch Region III; and Chief, Air Operations Branch Regions IX regarding Small VOC Sources
- January 25, 1989 Memorandum from Berkley Moore to Dennis Lawler, John Reed, Susan Schroeder, and Chris Romaine regarding telephone conversation with USEPA regarding Surface Coating Compliance and Cutoffs
- Letter, dated September 28, 1989, from David Kee to Michael J. Hayes ("Federal Letter")*

- Federal Register Vol. 52, Issue 226 - State Implementation Plans; Approval of Post-1987 Ozone and Carbon Monoxide Plan Revisions for Areas Not Attaining the National Ambient Air Quality Standards; Notice-November 24, 1987
- 40 C.F.R. 60.451 (1988)
- April 23, 1985 Memorandum from Gerald A. Emison to W. Ray Cunningham regarding Consideration of Organisms in Volatile Organic Compound (VOC) Compliance Calculations
- Memorandum dated September 5, 1989 to VOC Workgroup from James C. Berry, Chief of Chemical Application Section
- 4 pages to Environmental Paints and Coatings Training Program Prepared for USEPA Stationary Source Compliance Division Washington D.C., dated November 1988
- Initial Technical Support Document for Illinois Generic VOC Rule, dated January 28, 1989, from Steven Rosenthal to Gary Galezian ("TSD")
- Guideline Series - Control of Volatile Organic Compound Leaks from Synthetic Organic Chemical and Polymer Manufacturing Equipment, EPA-450/3-83-006, March 1984 ("CTG")
- Settlement Agreement in State of Wisconsin, Plaintiff, v. William K. Reilly, Administrator, United States Environmental Protection Agency, Defendant. State of Illinois and Illinois Environmental Protection Agency, Plaintiff-Intervenors, v. William K. Reilly, Administrator, United States Environmental Protection Agency, Defendant. State of Wisconsin, Plaintiff, v. State of Illinois and Illinois Environmental Protection Agency, Defendant-Intervenors, Case No. 87-C-0395 (U.S.

District Court for the Eastern District of Wisconsin) ("Settlement Agreement")

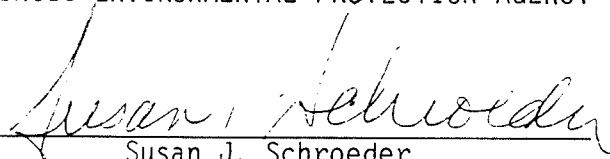
· Glossary for Air Pollution Control of Industrial Coating Operations
Second Edition by the United States Environmental Protection Agency,
Office of Air Quality Planning and Standards, Research Triangle Park,
NC 27711, EPA-450/3-83-013R, December 1983

* Please note that the Federal Letter referred to above will be delivered to the Illinois Pollution Control Board's Chicago Office by the United States Environmental Protection Agency on September 29, 1989.

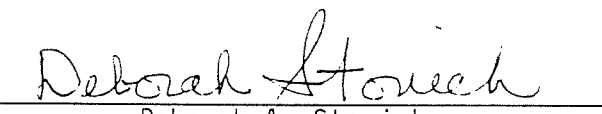
Respectfully submitted,

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

By:


Susan J. Schroeder
Attorney

By:


Deborah A. Stonich
Attorney

DATED: September 28, 1989

2200 Churchill Road
P.O. Box 19276
Springfield, IL 62794-9276
(217)782-5544