

ILLINOIS POLLUTION CONTROL BOARD

JULY 24, 2025

IN THE MATTER OF:

AMENDMENTS TO 35 ILL. ADM. CODE

219, ORGANIC MATERIAL EMISSIONS Board Docket No.

STANDARDS FOR THE METRO EAST R25-25

AREA

HEARING

DATE: Thursday, September 18, 2025

TIME: 9:01 a.m.

BEFORE: Anupama Paruchuri, Hearing Officer

LOCATION: Michael A. Bilandic Building

160 North LaSalle Street, Room N-502

Chicago, IL 60601

REPORTED BY: Haley Goodwin

JOB NO.: 7511325

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A P P E A R A N C E S

ON BEHALF OF ILLINOIS POLLUTION CONTROL BOARD:

TIMOTHY FOX, ESQUIRE

Illinois Pollution Control Board

60 East Van Buren Street, Suite 630

Chicago, IL 60605

tim.fox@illinois.gov

(312) 814-6085

ON BEHALF OF ILLINOIS POLLUTION CONTROL BOARD:

DANIEL PAULEY, ESQUIRE

Illinois Pollution Control Board

60 East Van Buren Street, Suite 630

Chicago, IL 60605

daniel.pauley@illinois.gov

(312) 814-6931

A P P E A R A N C E S (Cont'd)

ALSO PRESENT:

Michael D. Mankowski, Board Member (by
videoconference)

Angela Tin, Board Member (by videoconference)

Essence Brown, Environmental Scientist

Rory Davis, Manager - Regulatory Development Unit
- Air Quality Planning Section - EPA (by
videoconference)

Sarah McKavetz, Assistant Counsel for EPA Air
Regulatory Unit (by videoconference)

Dana Vetterhoffer, Deputy Counsel for EPA Air
Regulatory Unit (by videoconference)

Gouosen Chen, Air Quality Planning Section - EPA
(by videoconference)

Amanda Williams, Air Quality Planning Section -
EPA (by videoconference)

E X H I B I T S

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NO.	DESCRIPTION	ID/EVD
Hearing:		
Exhibit 1	IEPA Pre-filed Testimony	
	8-15-25	7/
Exhibit 2	R25-25 - HOO and BD Questions	
	(First Hearing) 09-11-25	8/

P R O C E E D I N G S

1
2 THE HEARING OFFICER: Good morning,
3 everyone, and welcome to this rulemaking hearing
4 entitled Amendments to 35 Illinois Administrative Code
5 219, Organic Material Emissions Standards for the
6 Metro East Area, board docket R25-25. My name is
7 Anupama Paruchuri and I'm the hearing officer. Also
8 present from the Board here in Springfield are Board
9 members Michael Mankowski and Angela Tin, and General
10 Counsel Marie Tipser [ph]. In Chicago, we have
11 Essence Brown from the Board's technical unit and
12 Attorney Tim Fox. From Illinois EPA, here in
13 Springfield, we have Rory Davis, Sarah McKavetz, Dana
14 Vetterhoffer, Gouosen Chen, and Amanda Williams.

15 This hearing is governed by the Board's
16 procedural rules. All information that is relevant
17 and not repetitious or privileged will be admitted
18 into the record. Any questions posed by the Board and
19 staff are intended to help develop a clear and
20 complete record for the board's decision. They do not
21 reflect any preconceived decision or bias.

22 For our court reporter's sake, please
23 speak clearly, one person at a time, so we can produce
24 a clear transcript. Remember to answer yes or no

1 questions orally, not moving your head or using other
2 gestures or sounds that are difficult to transcribe.

3 And I see Attorney Daniel Pauley from
4 the Board is also here as well.

5 The Illinois Environmental Protection
6 Agency filed this rulemaking proposal with the Board
7 on June 12, 2025. In August 2025, notice for this
8 hearing was published in papers circulated in several
9 different areas throughout the state of Illinois.

10 That notice also included a note that is adopted.

11 Illinois EPA attempted to submit this rulemaking to US
12 EPA for approval, and the revision to the Illinois
13 State --

14 On July 24, 2025, the hearing officer
15 directed participants intending to testify at this
16 hearing to pre-file testimony by August 15, 2025. On
17 August 15th, the Board received pre-filed testimony on
18 behalf of the Illinois EPA from Mr. Davis. We'll
19 start today's hearing by swearing in Mr. Davis. We'll
20 take his testimony as if read, and enter it as an
21 exhibit. So he may give a summary or introduction if
22 he wants.

23 Then we will move to the Board to
24 pre-file questions, again, entering those as read.

1 After that, anyone who wants to give a public comment
2 or ask questions will have that chance.

3 Are there any questions about the order
4 of the proceeding? Okay. Hearing none, will the
5 court reporter please swear in Mr. Davis?

6 THE REPORTER: Okay. Please raise your
7 right hand.

8 WHEREUPON,

9 RORY DAVIS,
10 called as a witness and having been first duly sworn
11 to tell the truth, the whole truth, and nothing but
12 the truth, was examined and testified as follows:

13 THE REPORTER: Thank you.

14 THE HEARING OFFICER: Okay. Mr. Davis,
15 do you want to give a brief summary or introduction?

16 THE WITNESS: I didn't have a -- an
17 introduction beyond my pre-filed testimony, and it's
18 been taken into the record as read.

19 THE HEARING OFFICER: Okay. So any
20 objections to entering the testimony pre-filed as an
21 exhibit? Seeing and hearing none, I will enter that
22 as Hearing Exhibit number 1.

23 (Hearing Exhibit 1 was marked for
24 identification.)

1 THE HEARING OFFICER: So moving on.
2 The Board's pre-filed questions, I will enter them as
3 read. Are there any objections to that? Again,
4 hearing none, I will enter those as Hearing Exhibit
5 number 2.

6 (Hearing Exhibit 2 was marked for
7 identification.)

8 THE HEARING OFFICER: So, Mr. Davis --
9 I'll just list the numbers of the questions instead of
10 rereading them.

11 THE WITNESS: I -- I don't mind
12 rereading them, or I can just give my responses
13 after -- after the -- prompt me with question 1A, 1B.

14 THE HEARING OFFICER: Okay.

15 THE WITNESS: However you want to do
16 it.

17 THE HEARING OFFICER: Yeah, well, I'll
18 just list the question number.

19 THE WITNESS: Okay.

20 THE HEARING OFFICER: I'll go through.
21 Okay. We'll start with question 1A.

22 THE WITNESS: Okay. The Agency's
23 response to question 1A is the Agency corresponded
24 with legal counsel who the agency believed, but has

1 not confirmed, was representing Gulfstream.

2 THE HEARING OFFICER: Question 1B.

3 THE WITNESS: Response to question 1B
4 is the discrepancy between what the Illinois rules
5 currently contained and what the aerospace coating
6 CTG -- that's Control Techniques Guidelines, and that
7 is the aerospace coating Control Technique
8 Guidelines -- recommends was pointed out to the Agency
9 by legal counsel who the Agency believed, but is not
10 confirmed, was representing Gulfstream.

11 THE HEARING OFFICER: Question 1C.

12 THE WITNESS: Agency's response to 1C
13 is, it is likely that the source, and in fact all of
14 the potentially affected sources, do use all three of
15 the categories in the question. The Agency does not
16 have the volumes of those coatings readily available,
17 but the sources are required to keep records of the
18 coatings that could be available to the Agency or the
19 Board upon request.

20 THE HEARING OFFICER: Question 1D.

21 THE WITNESS: The Agency's response to
22 question 1D is we provided the potentially affected
23 sources and contact information to the Board, but did
24 not contact the other potentially affected sources

1 directly. The revisions to the exemption would be
2 available to those other sources.

3 THE HEARING OFFICER: Question 1E.

4 THE WITNESS: The Agency's response to
5 question 1E. Gulfstream Aerospace Services
6 Corporation is represented by Kyle Retner, a public
7 affairs state advisor, and his email address is
8 kyle.retner -- retner, that's K-Y-L-E dot R-E-T-N-E-R,
9 at gulfstream.com. And Gulfstream is just one word,
10 G-U-L-F-S-T-R-E-A-M. The previous -- the Agency
11 previously provided contact information for
12 representatives of Premier Air Center -- it's also
13 doing business as West Star Aviation -- to the clerk
14 of the Board and are already included in this
15 proceedings notice list.

16 To clarify, the three sources that are
17 potentially affected by this rule -- rulemaking are
18 Gulfstream, Boeing, and Premier Air Center, now doing
19 business as West Star Aviation. And West Star is two
20 words, W-E-S-T space S-T-A-R.

21 THE HEARING OFFICER: Question 2.

22 THE WITNESS: Agency's response to
23 question 2, that is correct. It applies to all
24 categories.

1 THE HEARING OFFICER: Question 3A.

2 THE WITNESS: Agency's response to the
3 question 3A. It should be comparable. So in general,
4 specialty coating will have higher allowable VOM
5 contents.

6 THE HEARING OFFICER: Question 3B.

7 THE WITNESS: The response to 3B, as I
8 said, it would not be expected that additional
9 categories would have VOM contents that are higher
10 than the categories that are already able to be
11 exempted.

12 THE HEARING OFFICER: Question 4.

13 THE WITNESS: Agency's response to
14 number 4. The Agency does not believe it is necessary
15 to include that clarification as the exemption would
16 apply to all of the coatings -- coating categories in
17 R1. The different -- different types of primers and
18 topcoats are not specified in that language, and both
19 types of chemical milling maskants are included in the
20 definition.

21 THE HEARING OFFICER: Question 5A.

22 THE WITNESS: The Agency's response to
23 5A, the volume restrictions for touch-up coatings may
24 be more stringent than the CTG model -- in this.

1 Again, control techniques guidelines, not a rule. But
2 they are unrelated to the Agency's current proposed
3 amendments that only impact primers, topcoats, and
4 milling maskants. So if the question is whether a
5 source would be able to now exempt 200 gallons of
6 touch-up coating rather than 55 gallons, the answer
7 would be no.

8 THE HEARING OFFICER: Question 5B.

9 THE WITNESS: Response to 5B. The
10 current distinction between touch-up coatings and
11 low-volume use coatings would be in the definition of
12 touch-up coatings, and the relatively small volume
13 that a source would be able to apply in a 24-hour
14 period not to exceed three quarts. The definition
15 states that -- things are a coating used to cover
16 minor coating imperfections appearing after the main
17 coating operation. A low-volume coating only must be
18 a formulation that will not exceed 50 gallons in a
19 year. But for instance, a source could apply all 50
20 gallons of that formulation in a single day. So the
21 Agency does not think that distinguishing language is
22 necessary.

23 However, in reviewing the distinction
24 between the touch-up coatings and low-volume coatings,

1 the Agency is considering whether additional
2 record-keeping provisions are needed for the
3 low-volume coatings. If so, the Agency will propose
4 additional language as soon as possible.

5 THE HEARING OFFICER: Question 6.

6 THE WITNESS: In response to question
7 6, US EPA indicated that revisions were indeed more in
8 line with the CTG and would likely be approvable as to
9 that revision.

10 THE HEARING OFFICER: Question 7.

11 THE WITNESS: The response to question
12 7 is no.

13 THE HEARING OFFICER: And question 8.

14 THE WITNESS: Okay. And -- and this,
15 I'll read the question. "By allowing additional
16 exemptions, will the proposed amendments result in
17 increased VOM emissions in Illinois -- measured by
18 source-wide, annually, or any other metric?" The --
19 the Agency's response to question 8 is it is not
20 anticipated that the proposed amendments will result
21 in increases in allowable emissions at any of the
22 potentially affected sources.

23 It is possible that there could be
24 small increases or decreases to actual emissions at

1 any of the sources, but they may or may not be related
2 to these revisions. For instance, if a source were to
3 use these exemptions for a primer formulation that has
4 a limit of, say, 2.9 pounds per gallon, rather than
5 use the exemption on a formulation of a pre-treatment
6 coating, a coating that's already covered in the -- in
7 the exemption that has a limit of 6.5 pounds per
8 gallon of actual emissions, then actual emissions
9 could possibly decrease. Also, from year to year, a
10 source may use 120 gallons of exempt coating one year,
11 and only 80 gallons the next year. So it is difficult
12 to say that you would expect increases or decreases in
13 emissions due to these revisions.

14 However, to put the emissions in more
15 context, the entire exemption of 200 gallons per year
16 at a VOM content of around 5 pounds per gallon -- and
17 that's just to make the math -- math easy -- would
18 only involve 1,000 pounds, or one half ton of VOM
19 emissions per year. And that is not an excess of one
20 half ton per year, since the coating would all --
21 would have some allowed VOM content to begin with.

22 Say if it were a 5 pound per million --
23 or, sorry, 5 pound per gallon coating that -- that had
24 a -- a limit of 2.9 or 3 pounds per gallon, the excess

1 emissions would only be 2 pounds per gallon or so.
2 And then, at that 200 gallon exemption limit, then you
3 would be talking about about 400 pounds per year
4 for -- that's a -- a fifth of a ton.

5 THE HEARING OFFICER: And those were
6 all the pre-trial questions, but a couple of
7 follow-ups. So the rough math of the 400 pounds --
8 yeah, 400 pounds. So that would be under any
9 particular limits for the metro east area. There are
10 no issues with increasing VOM emissions in this area
11 by that much?

12 THE WITNESS: No, as I said, this won't
13 increase allowable emissions. And as I said, the --
14 the actual emissions could go down or could go up. So
15 right now, the exemptions apply to the specialty
16 coatings that are in R2, and generally, those coatings
17 have higher VOM limits. So if you were to use more of
18 the exemptions for the primers, the top coats, and the
19 milling maskants that generally has lower limits,
20 it -- it would depend on how much the exempted
21 coatings were above those limits that are existing.

22 So it could be that you apply a primer
23 that had a limit of, say, 5 pounds per gallon where
24 the limit was, you know, 3.8 or something like that.

1 So you'd have a difference there of 1.2 gallons -- or
2 pounds per gallon, where, with the specialty coating,
3 you could have a coating that has a limit of 5.4
4 pounds per gallon, but then have their -- the exempted
5 coating they used in the small quantity would be
6 something on the order of 8 pounds per gallon. So
7 that -- that difference would be bigger. So that's --
8 that's really the only way you would know how much
9 excess would be due to the exemption.

10 But it's hard to know which coatings
11 and which limits, and what the different in --
12 difference in VOM contents would be. And so
13 there's -- there's really no way to know exactly what
14 the -- the actual emissions could be. And like I
15 said, they could go down or up, and they may not be
16 going down or up based on those exemptions at all.
17 But with the 200 gallon total exemptions remaining the
18 same, the allowable emissions remain the same.

19 And so we don't anticipate that there
20 will be excess emissions or any need to, you know,
21 include those potential excess emissions in any kind
22 of planning. And as I said, it'd be, you know, worst
23 case, something on the order of half a ton, which is
24 not usually something that would, you know, move the

1 needle into the -- area. And that's half a ton per
2 year.

3 THE HEARING OFFICER: Okay. And it's a
4 200 gallons per year total exemption. So that does
5 not include touch-ups; touch-ups are -- separately?

6 THE WITNESS: That's right.

7 THE HEARING OFFICER: Okay. I don't
8 have any more questions. Does anyone else have more
9 questions? Yes.

10 MS. TIN: In 3A, you said that the VOM
11 content could be higher, but then you went on to
12 answer question B. Could you speculate, what is the
13 percentage higher, and if that percentage higher is
14 going to make any difference to the overall averaging
15 limit?

16 THE WITNESS: Okay. So in 3A, the
17 question is whether the contents of the primers,
18 topcoats, and chemical milling maskants being included
19 would be higher than the already exempted coatings.
20 And the -- the response to that, they should be
21 comparable. But in general, the -- the coatings in
22 R2, the specialty coatings, those VOM contents are
23 higher. So the question was whether the primers,
24 topcoats, and chemicals milling maskants that would be

1 added from R1 would be higher than those in R2.

2 MS. TIN: Yes.

3 THE WITNESS: And that is not the case.
4 In general, R1 is higher than -- or sorry, R2, their
5 already exempt level are higher than R1. And so
6 the -- the -- you know, in -- in follow-up B, it's not
7 expected that the additional categories would have
8 higher contents. But like I said, the -- the amount
9 of excess that could be allowed under the exemption
10 would only be known by knowing what the differences in
11 the exempt, minus the limit from that category is. So
12 if you had an exempt coating that had a -- a limit of
13 2.9 pounds, but you're using a coating that is 7.9
14 pounds, then each gallon has five more pounds of VOM
15 per gallon.

16 But it could be that that -- that
17 coating that has a limit of 2.9 pounds per gallon,
18 what they're using is only 3.3 pounds per gallon. And
19 so the excess would only be in the 0.4 pound per
20 gallon range. So it is hard to know, by, you know,
21 including or keeping the R1 coating categories
22 excluded, whether there could possibly be more excess
23 emissions from these exclusions or these exemptions.

24 But the allowables will say the same,

1 and these sources do have source-wide allowables. And
2 so that's kind of what we look at more. And that's
3 also what US EPA would probably consider in approving
4 it as a -- revision is a source-wide allowable.

5 MS. TIN: As a follow-up question,
6 would you have more of this information if there's
7 reporting or the reporting that comes from that?

8 THE WITNESS: Yes. Yes, we would.
9 And -- and generally, we don't ask for reporting as
10 much as -- to the onsite. And -- and that -- that
11 information is on -- generally, we would request the
12 type of coating and category, the number of gallons
13 used, and the VOM content.

14 MS. TIN: Thank you.

15 THE WITNESS: So they would keep
16 records at the source for us to examine if they
17 requested.

18 THE HEARING OFFICER: And you mentioned
19 the Agency may propose some additional language as
20 part of the record-keeping, at least distinguishing
21 between the touch-ups and the low-volume use; is that
22 right?

23 THE WITNESS: Yeah. What we found was
24 we did have fairly solid record-keeping for the

1 touch-up exemptions, and we're looking into whether
2 the record keeping for the -- for the low-volume
3 coating exemptions is adequate. So we may consult US
4 EPA on that, we may draft some additional language.
5 But it is possible that the Agency will think that
6 what we have currently is sufficient.

7 THE HEARING OFFICER: Is there any
8 other questions for Mr. Davis? Seeing and hearing no
9 response, moving on to public comments. Is there
10 anyone in Springfield or Chicago who signed up who
11 would like to make a public comment? Seeing and
12 hearing none, at this time, I'll address the economic
13 impact statement.

14 Section 27B of the Environmental
15 Protection Act requires the Board to request the
16 Department of Commerce and Economic Opportunity to
17 conduct an economic impact study of proposed rules
18 before the Board adopts those rules. The Board must
19 make the economic impact study or the DCEO's
20 explanation for not conducting one available to the
21 public at least 20 days before a public hearing.

22 In a letter dated July 11, 2025, the
23 Board's chair, Barbara Flynn Currie, requested that
24 DCEO conduct an economic impact study of this

1 rulemaking proposal. In a letter dated August 27,
2 2025, DCEO stated that this proposed rulemaking will
3 not have an economic impact on small businesses. I
4 will raise this again at the second hearing, but for
5 now, is there anyone who would like to testify about
6 DCEO's response? Seeing and hearing no response.

7 We can go off the record for a minute
8 to discuss some procedural issues.

9 THE REPORTER: Okay. Off the record.
10 The time is 9:24 a.m.

11 (Off the record.)

12 THE REPORTER: Back on the record. The
13 time is 9:27 a.m.

14 You may proceed.

15 THE HEARING OFFICER: Okay. We are
16 back on the record, having discussed some procedural
17 issues. First, I want to correct the record to say
18 DCEO actually responded to JR, not to the Board. That
19 was the small business impact statement. To date, the
20 Board has not received a response to its letter from
21 Chair Currie regarding an economic impact study. But
22 again, that will be raised at the second hearing.

23 So procedurally, the second hearing is
24 scheduled for Monday, November 17, 2025, in

1 Edwardsville, at the Madison County Courthouse. The
2 deadline to pre-file testimony for that hearing is
3 October 21st. The deadline to pre-file questions is
4 November 10th. Copies of this hearing transcript
5 should be available by Thursday, October 2nd. After
6 receiving that transcript, the Board will post it
7 online to COOL, the clerk online docking system where
8 anyone can view and print it.

9 Are there any other matters that need
10 to be addressed today on record? Okay. Seeing and
11 hearing no response.

12 Thank you, everyone, for your time.
13 This hearing is adjourned.

14 (Whereupon, at 9:28 a.m., the
15 proceeding was concluded.)

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CERTIFICATE

I, HALEY GOODWIN, the officer before whom the foregoing proceedings were taken, do hereby certify that any witness(es) in the foregoing proceedings, prior to testifying, were duly sworn; that the proceedings were recorded by me and thereafter reduced to typewriting by a qualified transcriptionist; that said digital audio recording of said proceedings are a true and accurate record to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.



HALEY GOODWIN
Notary Public in and for the
State of Illinois

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CERTIFICATE OF TRANSCRIBER

I, SARAH JOHNSON, do hereby certify that this transcript was prepared from the digital audio recording of the foregoing proceeding, that said transcript is a true and accurate record of the proceedings to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.



SARAH JOHNSON

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