

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:	)	
	)	R25-25
AMENDMENTS TO 35 ILL. ADM. CODE 219,	)	(Rulemaking-Air)
ORGANIC MATERIAL EMISSION	)	
STANDARDS FOR THE METRO EAST AREA	)	

NOTICE

TO: Don Brown, Clerk
Illinois Pollution Control Board
60 E. Van Buren St., Suite 630
Chicago, IL 60605
Don.brown@illinois.gov

SEE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board the SUPPLEMENTAL TESTIMONY OF RORY DAVIS, a copy of which is herewith served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: /s/ Sarah McKavetz
Sarah McKavetz
Assistant Counsel
Division of Legal Counsel

DATED: October 21, 2025

2520 W. Iles Ave.
PO Box 19276
Springfield, IL 62794-9276
217/782-5544

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SUPPLEMENTAL TESTIMONY OF RORY DAVIS

On September 18, 2025, I appeared and testified on behalf of the Illinois EPA at the first hearing on the proposed aerospace coating rule revisions in the above-captioned proceeding (R25-25). In responding to the Illinois Pollution Control Board's ("Board") pre-filed question 5B, the Agency stated it was "considering whether additional record-keeping provisions are needed for the low-volume coatings. If so, the Agency will propose additional language as soon as possible." *See*, R25-25, *First Hearing Transcript* (September 18, 2025) at 13:1-4.

Following further review of the current regulations under 35 Ill. Adm. Code 219.204 and 219.211, the Agency concluded that the current record-keeping provisions are sufficient, and so the Agency will not be proposing any additional language. Section 219.211(j)(1) provides that owners or operators using coatings listed in Section 219.204(r) must maintain a current list of coatings in use with their category and VOM content as applied and record their coating usage on an annual basis. Primers, topcoats, chemical milling maskants, and specialty coatings are coatings listed in Section 219.204(r). Any usage of separate formulations of primers, topcoats, chemical milling maskants, and specialty coatings with VOM content higher than the coating limitations in Section 219.204(r) will be recorded separately and be identifiable by the Agency. Therefore, the Agency does not believe any additional record-keeping provisions are required or necessary.

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CERTIFICATE OF SERVICE

I, the undersigned, an attorney, state the following:

I have served the attached SUPPLEMENTAL TESTIMONY OF RORY DAVIS by e-mail upon the following persons at the e-mail address of such persons:

Don Brown, Clerk
Illinois Pollution Control Board
60 E. Van Buren St., Suite 630
Chicago, IL 60605
don.brown@illinois.gov

SEE ATTACHED SERVICE LIST

My e-mail address is sarah.mckavetz@illinois.gov.

The number of pages in the e-mail transmission is 4 pages.

The e-mail transmission took place before 4:30 p.m. on October 21, 2025.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL PROTECTION
AGENCY,

By: /s/ Sarah McKavetz
Sarah McKavetz
Assistant Counsel
Division of Legal Counsel

Dated: October 21, 2025

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Springfield, IL 62794-9276
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SERVICE LIST

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Renee Snow, General Counsel Illinois Department of Natural Resources One Natural Resources Way Springfield, IL 62702 renee.snow@illinois.gov	