ILLINOIS POLLUTION CONTROL BOARD
May 7, 2026

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

Proposed Rule. Second Notice.

OPINION AND ORDER OF THE BOARD (by M.D. Mankowski):

On June 12, 2025, the Illinois Environmental Protection Agency (IEPA) filed a proposal to amend Part 219 of the Board's air pollution regulations. Part 219 addresses emissions of volatile organic materials (VOM) from various categories of stationary sources in the Metro East area. IEPA's proposal amended the aerospace coating requirements by adding VOM exemptions for primers, topcoats, and chemical milling maskants that were accidentally omitted from the original aerospace rulemaking in 2021. IEPA's proposal included a Statement of Reasons, Technical Support Document, and the proposed revisions to Part 219. *See* 35 Ill. Adm. Code 102.202.

On June 26, 2025, the Board accepted IEPA's proposal for hearing and submitted the proposal to first-notice publication without commenting on its substantive merits. *See* 49 Ill. Reg. 8883 (July 11, 2025). The Board has now conducted two hearings and received public comment on the proposal. For the reasons below, the Board today submits proposed revisions to Part 219 without any changes to second-notice review by the Joint Committee on Administrative Rules (JCAR).

GUIDE TO TODAY'S OPINION AND ORDER

The Board first provides the procedural history of this rulemaking and the background and development of the original proposal submitted by IEPA. Next, the Board provides a detailed summary of the proposal, addressing any issues raised by participants.

Finally, the Board addresses the technical feasibility and economic reasonableness of its second-notice proposal. After concluding to amend Part 219 of its air pollution rules, the Board directs its Clerk to submit the proposal to JCAR for second-notice review. Following this order, the Board includes its proposed rules.

PROCEDURAL HISTORY

On June 12, 2025, IEPA filed its rulemaking proposal, which included its Statement of Reasons (SR), Technical Support Document (TSD), and proposed revisions to Part 219 (Prop. 219). IEPA also included a 1997 control techniques guideline (CTG) issued by the United States

Environmental Protection Agency (USEPA), "Control of Volatile Organic Compound Emissions from Coating Operations at Aerospace Manufacturing and Rework Facilities" (EPA-453/R-97-004).[1]

On June 26, 2025, the Board accepted the proposal for hearing and submitted the proposal to first-notice publication in the *Illinois Register* without commenting on its substantive merits. 49 Ill. Reg. 8883 (July 11, 2025). Notice of the proposal was published in newspapers throughout the State.

On July 11, 2025, the Board requested that the Department of Commerce and Economic Opportunity (DCEO) conduct an economic impact study of the proposal by August 25, 2025. *See* 415 ILCS 5/27(b) (2024). To date, the Board has not received a response from DCEO.

On July 24, 2025, the Board's hearing officer issued an order scheduling two hearings, the first on Thursday, September 18, 2025, by videoconference between Chicago and Springfield and the second on Monday, November 17, 2025, by videoconference between Edwardsville and Springfield.

On August 1, 2025, The Boeing Company (Boeing) filed a comment. PC 1.

On August 15, 2025, IEPA pre-filed the testimony of Rory Davis for the first hearing (IEPA Test.).

On September 11, 2025, the Board's hearing officer filed an order, attached to which were questions for the Agency, including proposed substantive revisions to the first-notice proposal (Board Questions).

On September 18, 2025, the Board held its first hearing by videoconference between Chicago and Springfield and received the first hearing transcript (Tr.1) on October 2, 2025.

On October 21, 2025, IEPA filed supplemental testimony from Davis (IEPA Supp.).

On November 17, 2025, the Board held its second hearing by videoconference between Edwardsville and Springfield and received the second hearing transcript (Tr.2) on December 1, 2025.

BACKGROUND OF IEPA PROPOSAL

Aerospace Rulemaking History

Under Section 182 of the Clean Air Act (CAA), states are required to submit reasonably available control technology (RACT) standards for VOM emissions at aerospace manufacturing and rework operations in ozone nonattainment areas classified as moderate and above. SR at 2. The CTG recommends VOM RACT standards for these facilities. *Id*.

[1] The CTG will be cited as "CTG at __."

In a previous rulemaking, IEPA proposed these standards, and the Board subsequently adopted them, as amendments to Part 219 for aerospace facilities in the Metro East counties of Madison, Monroe, and St. Clair. SR at 1; Amendments to 35 Ill. Adm. Code 219, Organic Material Emission Standards for the Metro-East Area, and 35 Ill. Adm. Code 211, Definitions and General Provisions (Aerospace Rulemaking), R21-18 (Mar. 4, 2021). USEPA then approved the final rule as revisions to Illinois' State Implementation Plan (SIP) for VOM RACT standards. SR at 1; TSD at 1.

Low-Volume Exemptions

In its Aerospace Rulemaking proposal, IEPA intended to "implement the provisions of this CTG for aerospace manufacturing and rework facilities located in the Metro-East area." Aerospace Rulemaking, Statement of Reasons at 4 (Oct. 5, 2020). The Aerospace Rulemaking included a limited exemption in Section 219.214(r) for separate formulations of specialty coatings "in volumes of less than 50 gallons per year, subject to a maximum exemption of 200 gallons per year for all such formulations applied annually." SR at 1-2; 35 Ill. Adm. Code 219.204(r). However, that rulemaking omitted a similar exemption for primers, topcoats, and chemical milling maskants in the same volumes. *Id*. The CTG includes both low-volume exemptions. SR at 2-3; CTG at 4-3 to 4-4, B-4.

IEPA now requests that the Board correct the inadvertent omission and make the Illinois standards consistent with the USEPA guideline. SR at 2; TSD at 1, 6; IEPA Test. at 1-2.

SIP Submittal

If adopted, IEPA intends to submit this proposal to USEPA as a SIP revision for the Illinois VOM RACT standards. SR at 4; *see also* TSD at 1.

The Board asked if USEPA had indicated to IEPA that the amendments as proposed would be approved as a SIP revision. Board Questions at 4. The Board also asked if USEPA had indicated to IEPA that the existing rules in Part 219 were deficient or otherwise required amending. *Id*. IEPA confirmed that USEPA indicated the revisions were more in line with the CTG and would likely be approved as a SIP revision. T1 at 13. USEPA did not indicate any other issues with Part 219. *Id*.

Communication with Interested Entities

IEPA did not engage in public outreach on this proposal, but it did consult with Gulfstream Aerospace Services Corp. (Gulfstream), one of the potentially impacted sources in the Metro East area. SR 5. IEPA later clarified that it corresponded with legal counsel who was believed to represent Gulfstream. Tr.1 at 8-9.

The Board asked for additional details about this communication, including whether Gulfstream approached IEPA for the amendments, and whether Gulfstream uses primers, topcoats, and chemical milling maskants and the annual volumes of coatings used. Board Questions at 2. IEPA stated that the legal counsel believed to be representing Gulfstream had

informed IEPA of the discrepancy between the existing rules and the CTG. Tr.1 at 9. All three potentially affected sources, including Gulfstream, likely use all the categories of coatings. *Id*. IEPA further noted that sources are required to keep records of coatings that could be available to IEPA or the Board upon request. *Id*.

The Board also asked whether IEPA contacted the other two potentially affected sources, and whether they could also use the proposed exemptions. Board Questions at 2. IEPA did not contact the other sources but confirmed those sources would be able to use the proposed exemptions. Tr.1 at 9-10.

SUMMARY OF PROPOSED AMENDMENTS TO PART 219

Section 219.204(r)

Section 219.204(r) lists VOM content limitations at aerospace facilities for primers, topcoats, and chemical milling maskants in subsection (r)(1) and specialty coatings in subsection (r)(2). 35 Ill. Adm. Code 219.204(r). As noted above, separate formulations of aerospace specialty coatings in volumes less than 50 gallons per year are exempt from the limitations in Section 219.204(r)(2), with a maximum exemption of 200 gallons for all formulations applied annually. *Id*. IEPA proposed to add the same low-volume exemption for primers, topcoats, and chemical milling maskants in Section 219.204(r)(1). SR at 2-3; TSD at 1, 6; Prop. 219 at 33.

In its proposal, IEPA referred to not only the CTG but also the National Emission Standards for Hazardous Air Pollutants (NESHAP), stating that the latter also includes the exemption. SR at 3; TSD at 3. According to IEPA, the NESHAP below for aerospace manufacturing and rework facilities reinforces that the exemption is intended to apply to both categories of coatings and clarifies that the exemption applies to each separate formulation. SR at 3.

> The requirements for primers, topcoats, specialty coatings, and chemical milling maskants in §§ 63.745 and 63.747 do not apply to the use of low-volume coatings in these categories for which the annual total of each separate formulation used at a facility does not exceed 189 l (50 gal), and the combined annual total of all such primers, topcoats, specialty coatings, and chemical milling maskants used at a facility does not exceed 757 l (200 gal).

Id. at 3, citing 40 CFR 63.741(g). IEPA argued that the current language in Section 219.204(r) "leaves aerospace manufacturing and rework facilities in the Metro-East area vulnerable to exceedances of low-volume primer, topcoat and chemical milling maskant limits, which was not intended by IEPA, the 1997 CTG, or the NESHAP." SR at 3.

Risk of Increased Emissions

IEPA reasoned that because the proposed revision expands the categories of exempt coatings but does not change the existing 200-gallon annual limit for exempt coatings, the proposal would likely result in little to no increase in emissions beyond the existing rule. SR 4;

TSD at 4; IEPA Test. at 2. Given the limited reach of the current proposal, IEPA believes that adopting the proposed rule will not result in either significant emission reductions or increases. SR at 5.

The Board asked IEPA to clarify whether the 200-gallon annual limit applies to the combined volume of specialty coatings, primers, topcoats, and chemical milling maskants. Board Questions at 2. IEPA confirmed the limit applies to all categories. Tr.1 at 10.

The Board noted that the CTG model rule specifically exempts low-volume use of Type I and Type II chemical milling maskants. Board Questions at 3; CTG at B-4. Additionally, the Board's definition of "chemical milling maskants" at Section 211.985 includes only Type I and Type II and excludes specialty coatings. 35 Ill. Adm. Code 211.985. Because the exemptions as proposed by IEPA did not specify the type of maskant, the Board asked whether IEPA objected to adding the following qualifier: ". . .primers, topcoats, and **Type I and Type II** chemical milling maskants, . . ." (proposed Board language in bold). Board Questions at 3. IEPA did not believe it was necessary to include the clarification because the exemption would apply to all coating categories in Section 219.204(r)(1). Tr.1 at 11. The "different types of primers and topcoats are not specified in that language, and both types of chemical milling maskants are included in the definition." *Id*.

Given IEPA's assertion that the proposed revisions will not result in additional VOM emissions at existing sources, the Board asked IEPA whether the VOM contents of primers, topcoats, and chemical milling maskants included under the low-volume exemption are comparable to the already exempt specialty coatings. Board Questions at 2-3. If the VOM contents are higher, the Board asked whether the expanded exemption would result in increased VOM emissions. *Id*. at 3. IEPA confirmed that the contents are comparable to already exempt coatings, though in general, specialty coatings in Section 219.204(r)(2) will have higher allowable VOM contents than the categories that would be added to Section 219.204(r)(1). Tr.1 at 11, 17-18.

Finally, the Board asked whether allowing additional exemptions would result in increased VOM emissions, measured source-wide, annually, or by any other metric. Board Questions at 4. IEPA does not anticipate increases in allowable emissions at any of the potentially affected sources, though there could be small increases or decreases to actual emissions that may or may not be related to the amendments. Tr.1 at 13-14. IEPA attributed the uncertainty to several factors, such as the varying amounts of exempt coatings used each year, the differences in VOM contents between specialty coatings (typically higher) and the other categories (typically lower), the VOM content of any exempt coating, and the amount of each exempt coating used each year. *Id*. at 14-16, 18. Recordkeeping of each coating and category, the number of gallons used, and the VOM content would provide IEPA with more information. *Id*. at 19.

IEPA emphasized that, regardless of the coating type used, the 200-gallon total annual exemption would still apply, and thus the total allowable emissions would remain the same. Tr.1 at 16, 18-19. The potentially affected sources also have source-wide allowable limits, which IEPA and likely USEPA would consider more than other metrics. *Id*. at 18-19. Overall, IEPA

believes the exemptions could create up to half a ton per year of additional VOM emissions in the Metro West area. *Id*. at 16-17.

Touch-ups of Specialty Coatings

The CTG model rule exempts touch-ups of specialty coatings regardless of the volume used. CTG at B-4. In contrast, Section 219.208(f)(3) states that Section 219.204(r)(2) does not apply to touch-ups, "provided that the combined source-wide volume of the coatings that do not comply with the limitations of Section 219.204(r)(2) used at an aerospace facility does not exceed 2.85 l (3 quarts) per 24-hour period or exceed 209 l/yr (55 gal/yr) for any rolling 12-month period. Recordkeeping and reporting for touch-up coatings must be consistent with Section 219.211(j)(2)." 35 Ill. Adm. Code 219.208(f)(3).

The Board asked whether Section 219.204(r) is currently more stringent than the model rule for touch-ups of specialty coatings and, if so, whether the proposed amendments will relax the standards for these touch-ups. Board Questions at 3. IEPA stated the volume restrictions for touch-up coatings may be more stringent but are unrelated to the current proposal, which impacts only primers, topcoats, and chemical milling maskants. Tr.1 at 11-12. IEPA further confirmed that a source would not be able to exempt 200 gallons of touch-up coating rather than 55 gallons. *Id*. at 12.

The Board further asked whether Section 219.204(r) should include language to distinguish between touch-ups and low-volume use of coatings, because unlike the CTG model rule, it currently does not include a reference to specialty coating touch-ups. Board Questions at 4. IEPA did not believe distinguishing language was necessary because the definition of "touch-up coatings" already achieves that distinction. Tr.1 as 12. The definition limits sources to applying three quarts of touch-up coating in a 24-hour period, while sources limited to 50 gallons per year of low-volume use could apply all 50 gallons in a single day. *Id*.

Given the distinction, IEPA stated it was considering additional recordkeeping provisions for low-volume coatings. Tr.1 at 12-13, 19-20. IEPA ultimately did not propose additional language for this rulemaking, concluding that the current provisions in Section 219.211(j)(1) are sufficient. Tr.2 at 5; IEPA Supp. at 1; 35 Ill. Adm. Code 219.211(j)(1). Specifically, Section 219.211(j)(1) requires owners or operators using coatings listed in Section 219.204(r) to maintain a current list of coatings in use with their categories and VOM contents as applied and record coating usage on an annual basis. *Id*. "Any use 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." IEPA Supp. at 1.

Public Comments

Boeing commented in support of IEPA's proposed revisions. PC 1. The company has operations in the Metro East area that would be affected by the proposed rule. *Id*. Boeing stated that the proposal "would align VOM state rules with the federal guidance" published in the CTG, and that adopting the rule would provide "reliable, coherent, and widely accepted requirements

for controlling emissions from aerospace activities" and would keep the area "competitive for aerospace manufacturing." *Id*. Boeing did not participate further in this rulemaking.

TECHNICAL FEASIBILITY AND ECONOMIC REASONABLENESS

Potentially Affected Sources

The proposed rule will apply to aerospace manufacturing and rework operations that include the manufacture or rework of commercial, civil, or military aerospace vehicles or components at sources located in the Metro East area that have a potential to emit at least 25 tons per year of VOM. SR at 4; TSD at 1-2. The proposed amendment would potentially affect three sources in the Metro East area: Gulfstream in Cahokia; Premiere Air Center Inc. in East Alton; and Boeing in Mascoutah. *Id*. All three sources would be able to use the exemption proposed in the amendment. Tr.1 at 9-10.

Request for Economic Impact Study

As required by Section 27(b) of the Act (415 ILCS 5/27(b) (2024)), on July 11, 2025, the Board requested that DCEO conduct an economic impact study of the proposed rules by August 25, 2025. To date, the Board has not received a response from DCEO. However, the Board notes that on August 27, 2025, DCEO responded to JCAR's request for a Small Business Impact Analysis. In that response, DCEO concluded that the proposed rulemaking will not have an economic impact on small businesses.

There was no testimony at either hearing and no public comments filed regarding the Board's request and DCEO's lack of response. Tr.1 at 20-21; Tr.2 at 6.

Technical Feasibility and Economic Reasonableness

Section 27(a) of the Act requires the Board, when promulgating rules, to "take into account" the "technical feasibility and economic reasonableness of measuring or reducing the particular type of pollution." 415 ILCS 5/27(a) (2024); *see also* Granite City Div. of Nat'l Steel Co. v. Illinois Pollution Control Board, 155 Ill. 2d 149, 182-83 (1993) (Board need only "consider or take into account" technical feasibility and economic reasonableness; Board need not conclude that compliance is technically feasible and economically reasonable to adopt regulations). The Board will discuss the technical feasibility and economic reasonableness of the proposed rules in this section.

IEPA maintained that, given the limited scope of this proposal, compliance is both technically feasible and economically reasonable. SR at 5. The proposed revisions are technically feasible because they are intended only to make the existing rule language more consistent with the aerospace CTG and the federal aerospace NESHAP, "which was the Agency's intent when the aerospace coatings regulations were originally adopted." TSD at 3. IEPA believes the proposed revisions will allow an exemption to apply to additional categories of coatings and provide additional flexibility to subject sources. *Id*. IEPA further noted that the amendment was requested by a potentially impacted source. *Id*.

IEPA argued that the proposed revisions are also economically reasonable because the proposed revisions likely will not create any additional costs for the potentially affected sources. SR at 5; TSD at 4. The revisions allow only for exempting a low volume of primers, topcoats, and chemical milling maskants, consistent with the aerospace CTG and applicable aerospace NESHAP. TSD at 4. IEPA believes this will provide subject sources with additional compliance flexibility rather than increase costs. *Id*.

Based on the record, the Board agrees with IEPA and finds that the proposed revisions are technically feasible and economically reasonable.

CONCLUSION

The Board finds that the first-notice proposal is technically feasible and economically reasonable. Therefore, the Board will submit the proposed amendments for second-notice review to JCAR.

ORDER

The Board directs its Clerk to submit the proposed amendments to Part 219 to JCAR for second-notice review. *See* 5 ILCS 100/5-40(c) (2024).

IT IS SO ORDERED.

I, Don A. Brown, Clerk of the Illinois Pollution Control Board, certify that the Board adopted the above order on April 16, 2026, by a vote of 4-0.

Don A. Brown

Don A. Brown, Clerk
Illinois Pollution Control Board

TITLE 35: ENVIRONMENTAL PROTECTION
SUBTITLE B: AIR POLLUTION
CHAPTER I: POLLUTION CONTROL BOARD
SUBCHAPTER c: EMISSIONS STANDARDS AND LIMITATIONS FOR STATIONARY SOURCES

PART 219
ORGANIC MATERIAL EMISSION STANDARDS AND LIMITATIONS FOR THE METRO EAST AREA

SUBPART A: GENERAL PROVISIONS

Section

SUBPART B: ORGANIC EMISSIONS FROM STORAGE AND LOADING OPERATIONS

Section

SUBPART C: ORGANIC EMISSIONS FROM MISCELLANEOUS EQUIPMENT

Section

SUBPART E: SOLVENT CLEANING

SUBPART F: COATING OPERATIONS

SUBPART G: USE OF ORGANIC MATERIAL

SUBPART H: PRINTING AND PUBLISHING

SUBPART Q: SYNTHETIC ORGANIC CHEMICAL AND POLYMER MANUFACTURING PLANT

SUBPART R: PETROLEUM REFINING AND

RELATED INDUSTRIES; ASPHALT MATERIALS

SUBPART S: RUBBER AND MISCELLANEOUS PLASTIC PRODUCTS

SUBPART T: PHARMACEUTICAL MANUFACTURING

SUBPART V: BATCH OPERATIONS AND AIR OXIDATION PROCESSES

SUBPART W: AGRICULTURE

SUBPART X: CONSTRUCTION

SUBPART Y: GASOLINE DISTRIBUTION

SUBPART Z: DRY CLEANERS

SUBPART AA: PAINT AND INK MANUFACTURING

SUBPART BB: POLYSTYRENE PLANTS

SUBPART FF: BAKERY OVENS

SUBPART GG: MARINE TERMINALS

SUBPART HH: MOTOR VEHICLE REFINISHING

SUBPART II: FIBERGLASS BOAT MANUFACTURING MATERIALS

SUBPART JJ: MISCELLANEOUS INDUSTRIAL ADHESIVES

SUBPART PP: MISCELLANEOUS FABRICATED PRODUCT MANUFACTURING PROCESSES

SUBPART QQ: MISCELLANEOUS FORMULATION MANUFACTURING PROCESSES

SUBPART RR: MISCELLANEOUS ORGANIC CHEMICAL MANUFACTURING PROCESSES

SUBPART TT: OTHER EMISSION UNITS

SUBPART UU: RECORDKEEPING AND REPORTING

219.APPENDIX E List of Affected Marine Terminals
219.APPENDIX G TRE Index Measurements for SOCMI Reactors and Distillation Units
219.APPENDIX H Baseline VOM Content Limitations for Subpart F, Section 219.212 Cross-Line Averaging

AUTHORITY: Implementing Section 10 and authorized by Sections 27, 28 and 28.5 of the Environmental Protection Act [415 ILCS 5/10, 27, 28 and 28.5].

SOURCE: Adopted in R91-8 at 15 Ill. Reg. 12491, effective August 16, 1991; amended in R91-24 at 16 Ill. Reg. 13597, effective August 24, 1992; amended in R91-30 at 16 Ill. Reg. 13883, effective August 24, 1992; emergency amendment in R93-12 at 17 Ill. Reg. 8295, effective May 24, 1993, for a maximum of 150 days; amended in R93-9 at 17 Ill. Reg. 16918, effective September 27, 1993 and October 21, 1993; amended in R93-28 at 18 Ill. Reg. 4242, effective March 3, 1994; amended in R94-12 at 18 Ill. Reg. 14987, effective September 21, 1994; amended in R94-15 at 18 Ill. Reg. 16415, effective October 25, 1994; amended in R94-16 at 18 Ill. Reg. 16980, effective November 15, 1994; emergency amendment in R95-10 at 19 Ill. Reg. 3059, effective February 28, 1995, for a maximum of 150 days; amended in R94-21, R94-31 and R94-32 at 19 Ill. Reg. 6958, effective May 9, 1995; amended in R94-33 at 19 Ill. Reg. 7385, effective May 22, 1995; amended in R96-2 at 20 Ill. Reg. 3848, effective February 15, 1996; amended in R96-13 at 20 Ill. Reg. 14462, effective October 28, 1996; amended in R97-24 at 21 Ill. Reg. 7721, effective June 9, 1997; amended in R97-31 at 22 Ill. Reg. 3517, effective February 2, 1998; amended in R04-12/20 at 30 Ill. Reg. 9799, effective May 15, 2006; amended in R06-21 at 31 Ill. Reg. 7110, effective April 30, 2007; amended in R10-10 at 34 Ill. Reg. 5392, effective March 23, 2010; amended in R10-8 at 34 Ill. Reg. 9253, effective June 25, 2010; amended in R10-20 at 34 Ill. Reg. 14326, effective September 14, 2010; amended in R10-8(A) at 35 Ill. Reg. 496, effective December 21, 2010; amended in R11-23 at 35 Ill. Reg. 13676, effective July 27, 2011; amended in R11-23(A) at 35 Ill. Reg. 18830, effective October 25, 2011; amended in R12-24 at 37 Ill. Reg. 1722, effective January 28, 2013; amended in R13-18 at 38 Ill. Reg. 1061, effective December 23, 2013; amended in R21-18 at 45 Ill. Reg. 3553, effective March 4, 2021; amended in R25-25 at 49 Ill. Reg. _____, effective _____.

SUBPART F: COATING OPERATIONS

Section 219.204 Emission Limitations

Except as provided in Sections 219.205, 219.207, 219.208, 219.212, 219.215 and 219.216, an owner or operator of a coating line must not apply at any time any coating in which the VOM content exceeds the following emission limitations for the specified coating. Except as otherwise provided in subsections (a), (c), (g), (h), (j), (l), (n), (o), (q), and (r), compliance with the emission limitations marked with an asterisk in this Section is required on and after March 15, 1996, and compliance with emission limitations not marked with an asterisk is required until March 15, 1996. The following emission limitations are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition. Compliance with this Subpart must

be demonstrated through the applicable coating analysis test methods and procedures specified in Section 219.105(a) and the recordkeeping and reporting requirements specified in Section 219.211(c) except where noted. (Note: The equation presented in Section 219.206 must be used to calculate emission limitations for determining compliance by add-on controls, credits for transfer efficiency, emissions trades and cross-line averaging.) The emission limitations are as follows:

			kg/l	lb/gal
a)	Automobile or Light-Duty Truck Coating			
	1)	Prior to May 1, 2012:		
		A) Prime coat	0.14	(1.2)
			0.14*	(1.2)*
		B) Primer surface coat	1.81	(15.1)
			1.81*	(15.1)*

BOARD NOTE: The primer surface coat limitation is in units of kg (lbs) of VOM per l (gal) of coating solids deposited. Compliance with the limitation must be based on the daily-weighted average from an entire primer surface operation. Compliance must be demonstrated in accordance with the topcoat protocol referenced in Section 219.105(b)(1)(A) and the recordkeeping and reporting requirements specified in Section 219.211(f). Testing to demonstrate compliance must be performed in accordance with the topcoat protocol and a detailed testing proposal approved by the Agency and USEPA specifying the method of demonstrating compliance with the protocol. Section 219.205 does not apply to the primer surface limitation.

		kg/l	lb/gal
C)	Topcoat		
		1.81	(15.1)
		1.81*	(15.1)*

BOARD NOTE: The topcoat limitation is in units of kg (lbs) of VOM per l (gal) of coating solids deposited. Compliance with the limitation must be based on the daily-weighted average from an entire topcoat operation. Compliance must be demonstrated in accordance with the topcoat protocol referenced in Section 219.105(b)(1)(A) and the recordkeeping and reporting requirements specified in Section 219.211(f). Testing to demonstrate compliance must be performed in accordance with the topcoat protocol and a detailed testing proposal approved by the Agency and USEPA specifying the method of demonstrating compliance with the protocol. Section 219.205 does not apply to the topcoat limitation.

		kg/l	lb/gal
D)	Final repair coat		
		0.58	(4.8)
		0.58*	(4.8)*

2) On and after May 1, 2012, subject automobile and light-duty truck coating lines must comply with the following limitations. These limitations must not apply to materials supplied in containers with a net volume of 0.47 liters (16 oz) or less, or a net weight of 0.45 kg (1 lb) or less:

A) Electrodeposition primer (EDP) operations. For purposes of this subsection (a)(2)(A), "electrodeposition" means a water-borne dip coating process in which opposite electrical charges are applied to the substrate and the coating. The coating is attracted to the substrate due to the electrochemical potential difference that is created.

		kg VOM/l coating solids applied	lb VOM/gal coating solids applied
i)	When solids turnover ratio (R_T) is greater than or equal to 0.160	0.084	(0.7)
ii)	When R_T is greater than or equal to 0.040 and less than 0.160	$0.084 \times 350^{0.160-R_T}$	$(0.084 \times 350^{0.160-R_T} \times 8.34)$

B) Primer surfacer operations

		kg VOM/l coating solids deposited	lb VOM/gal coating solids deposited
i)	VOM content limitation	1.44	(12.0)

ii) Compliance with the limitation in subsection (a)(2)(B)(i) must be based on the daily-weighted average from an entire primer surfacer operation. Compliance must be demonstrated in accordance with the topcoat protocol referenced in Section 219.105(b)(1)(B) and the recordkeeping and reporting requirements specified in Section 219.211(f). Testing to demonstrate compliance must be performed in accordance with the topcoat protocol and a detailed testing proposal approved by the Agency and USEPA specifying the method of demonstrating

compliance with the protocol. Section 219.205 does not apply to the primer surfacer limitation.

C) Topcoat operations

		kg VOM/l coating solids deposited	lb VOM/gal coating solids deposited
i)	VOM content limitation	1.44	(12.0)

ii) Compliance with the limitation in subsection (a)(2)(C)(i) must be based on the daily-weighted average from an entire topcoat operation. Compliance must be demonstrated in accordance with the topcoat protocol referenced in Section 219.105(b)(1)(B) and the recordkeeping and reporting requirements specified in Section 219.211(f). Testing to demonstrate compliance must be performed in accordance with the topcoat protocol and a detailed testing proposal approved by the Agency and USEPA specifying the method of demonstrating compliance with the protocol. Section 219.205 does not apply to the topcoat limitation.

D) Combined primer surfacer and topcoat operations

		kg VOM/l coating solids deposited	lb VOM/gal coating solids deposited
i)	VOM content limitation	1.44	(12.0)

ii) Compliance with the limitation in subsection (a)(2)(D)(i) must be based on the daily-weighted average from the combined primer surfacer and topcoat operations. Compliance must be demonstrated in accordance with the topcoat protocol referenced in Section 219.105(b)(1)(B) and the recordkeeping and reporting requirements specified in Section 219.211(f). Testing to demonstrate compliance must be performed in accordance with the topcoat protocol and a detailed testing proposal approved by the Agency and USEPA specifying the method of demonstrating compliance with the protocol. Section 219.205 does not apply to the combined primer surfacer and topcoat limitation.

E) Final repair coat operations

		kg/l coatings	lb/gal coatings
i)	VOM content limitation	0.58	(4.8)

ii) Compliance with the final repair operations limitation in subsection (a)(2)(E)(i) must be on an occurrence-weighted average basis, calculated in accordance with the equation below, in which clear coatings must have a weighting factor of 2 and all other coatings must have a weighting factor of 1. For purposes of this subsection (a)(2)(E)(ii), an "occurrence" is the application of the combination of coatings that constitute a final repair coat for a single automobile or light-duty truck. Section 219.205 does not apply to the final repair coat limitation.

$$VOM_{tot} = \frac{2VOM_{cc} + \sum_{i=1}^{n} VOM_i}{n+2}$$

where:

VOM_{tot} = Total VOM content of all coatings, as applied, on an occurrence weighted average basis, and used to determine compliance with this subsection (a)(2)(E).

i = Subscript denoting a specific coating applied.

n = Total number of coatings applied in the final repair operation, other than clear coatings.

VOM_{cc} = The VOM content, as applied, of the clear coat used in the final repair operation.

VOM_i = The VOM content of each coating used in the final repair operation, as applied, other than clear coatings.

F) Miscellaneous Materials. For reactive adhesives subject to this subsection (a)(2)(F), compliance must be demonstrated in accordance with the methods and procedures set forth in appendix A to Subpart PPPP of 40 CFR 63, incorporated by reference in Section 219.112.

		kg/l	lb/gal
i)	Glass bonding primer	0.90	(7.51)

	ii)	Adhesive	0.25	2.09)
	iii)	Cavity wax	0.65	(5.42)
	iv)	Trunk sealer	0.65	(5.42)
	v)	Deadener	0.65	(5.42)
	vi)	Gasket/gasket sealing material	0.20	(1.67)
	vii)	Underbody coating	0.65	(5.42)
	viii)	Trunk interior coating	0.65	(5.42)
	ix)	Bedliner	0.20	(1.67)
	x)	Weatherstrip adhesive	0.75	(6.26)
	xi)	Lubricating wax/compound	0.70	(5.84)

					kg/l	lb/gal
b)	Can Coating					
	1)	Sheet basecoat and overvarnish				
		A)	Sheet basecoat		0.34 0.26*	(2.8) (2.2)*
		B)	Overvarnish		0.34 0.34	(2.8) (2.8)*
	2)	Exterior basecoat and overvarnish			0.34 0.25*	(2.8) (2.1)*
	3)	Interior body spray coat				
		A)	Two piece		0.51 0.44*	(4.2) (3.7)*
		B)	Three piece		0.51 0.51*	(4.2) (4.2)*
	4)	Exterior end coat			0.51 0.51*	(4.2) (4.2)*

	5)	Side seam spray coat	0.66 0.66*	(5.5) (5.5)*
	6)	End sealing compound coat	0.44 0.44*	(3.7) (3.7)*
c)	Paper Coating		kg/l	lb/gal
	1)	Prior to May 1, 2011:	0.28	(2.3)
	2)	On and after May 1, 2011:	kg VOM/kg (lb VOM/lb) solids applied	kg VOM/kg (lb VOM/lb) coatings applied
		A) Pressure sensitive tape and label surface coatings	0.20	(0.067)
		B) All other paper coatings	0.40	(0.08)

3) The paper coating limitation in this subsection (c) does not apply to any owner or operator of any paper coating line on which flexographic, rotogravure, lithographic, or letterpress printing is performed if the paper coating line complies with the applicable emissions limitations in Subpart H. In addition, screen printing on paper is not regulated as paper coating, but is regulated under Subpart TT. On and after May 1, 2011, the paper coating limitation also does not apply to coating performed on or in-line with any digital printing press, or to size presses and on-machine coaters on papermaking machines applying sizing or water-based clays.

d)	Coil Coating	kg/l 0.31 0.20*	lb/gal (2.6) (1.7)*
e)	Fabric Coating	0.35 0.28*	(2.9) (2.3)*
f)	Vinyl Coating	0.45 0.28*	(3.8) (2.3)*
g)	Metal Furniture Coating		
	1) Prior to May 1, 2011:	kg/l	lb/gal
	A) Air dried	0.34	(2.8)

	B)	Baked	0.28	(2.3)
2)	On and after May 1, 2011:		kg/l (lb/gal) solids applied	kg/l (lb/gal)
	A)	General, One Component	0.275 (2.3)	0.40 (3.3)
	B)	General, Multi-Component		
		i) Air dried	0.340 (2.8)	0.55 (4.5)
		ii) Baked	0.360 (3.0)	0.61 (5.1)
	C)	Extreme High Gloss		
		i) Air dried	0.340 (2.8)	0.55 (4.5)
		ii) Baked	0.360 (3.0)	0.61 (5.1)
	D)	Extreme Performance		
		i) Air dried	0.420 (3.5)	0.80 (6.7)
		ii) Baked	0.360 (3.0)	0.61 (5.1)
	E)	Heat Resistant		
		i) Air dried	0.420 (3.5)	0.80 (6.7)
		ii) Baked	0.360 (3.0)	0.61 (5.1)
	F)	Metallic	0.420 (3.5)	0.80 (6.7)
	G)	Pretreatment Coatings	0.420 (3.5)	0.80 (6.7)

H) Solar Absorbent

i)	Air dried	0.420 (3.5)	0.80 (6.7)
ii)	Baked	0.360 (3.0)	0.61 (5.1)

3) On and after May 1, 2011, the limitations in this subsection (g) do not apply to stencil coatings, safety-indicating coatings, solid-film lubricants, electric-insulating and thermal-conducting coatings, touch-up and repair coatings, or coating applications utilizing hand-held aerosol cans.

h) Large Appliance Coating

1)	Prior to May 1, 2011:	kg/l	lb/gal
A)	Air dried	0.34	(2.8)
B)	Baked	0.28	(2.3)

2)	On and after May 1, 2011:	kg/l (lb/gal)	kg/l (lb/gal) solids applied
A)	General, One Component	0.275 (2.3)	0.40 (3.3)
B)	General, Multi-Component		
i)	Air dried	0.340 (2.8)	0.55 (4.5)
ii)	Baked	0.275 (2.3)	0.40 (3.3)
C)	Extreme High Gloss		
i)	Air dried	0.340 (2.8)	0.55 (4.5)
ii)	Baked	0.360 (3.0)	0.61 (5.1)
D)	Extreme Performance		

	i)	Air dried	0.420 (3.5)	0.80 (6.7)
	ii)	Baked	0.360 (3.0)	0.61 (5.1)
E)	Heat Resistant			
	i)	Air dried	0.420 (3.5)	0.80 (6.7)
	ii)	Baked	0.360 (3.0)	0.61 (5.1)
F)	Metallic		0.420 (3.5)	0.80 (6.7)
G)	Pretreatment Coatings		0.420 (3.5)	0.80 (6.7)
H)	Solar Absorbent			
	i)	Air dried	0.420 (3.5)	0.80 (6.7)
	ii)	Baked	0.360	0.61

3) The limitations in this subsection (h) do not apply to the use of quick-drying lacquers for repair of scratches and nicks that occur during assembly, provided that the volume of coating does not exceed 0.95 1 (1 quart) in any one rolling eight-hour period. On and after May 1, 2011, these limitations also do not apply to stencil coatings, safety-indicating coatings, solid-film lubricants, electric-insulating and thermal-conducting coatings, touch-up and repair coatings, or coating applications utilizing hand-held aerosol cans.

		kg/l	lb/gal
i)	Magnet Wire Coating	0.20 0.20*	(1.7) (1.7)*
j)	Prior to May 1, 2012: Miscellaneous Metal Parts and Products Coating		
1)	Clear coating	0.52 0.52*	(4.3) (4.3)*

2)	Extreme performance coating			
	A)	Air dried	0.42 0.42*	(3.5) (3.5)*
	B)	Baked	0.42 0.40*	(3.5) (3.3)*
3)	Steel pail and drum interior coating		0.52 0.52*	(4.3) (4.3)*
4)	All other coatings			
	A)	Air dried	0.42 0.40*	(3.5) (3.3)*
	B)	Baked	0.36 0.34*	(3.0) (2.8)*
5)	Metallic Coating			
	A)	Air dried	0.42 0.42*	(3.5) (3.5)*
	B)	Baked	0.36 0.36	(3.0) (3.0)*

6) For purposes of subsection (j)(5), "metallic coating" means a coating which contains more than ¼ lb/gal of metal particles, as applied.

BOARD NOTE: On and after May 1, 2012, the limitations in Section 219.204(q) apply to this category of coating.

k)	Heavy Off-Highway Vehicle Products Coating		kg/l	lb/gal
1)	Extreme performance prime coat		0.42 0.42*	(3.5) (3.5)*
2)	Extreme performance topcoat (air dried)		0.42 0.42*	(3.5) (3.5)*
3)	Final repair coat (air dried)		0.42 0.42*	(3.5) (3.5)*

4) All other coatings are subject to the emission limitations for miscellaneous metal parts and products coatings in subsection (j).

l) Wood Furniture Coating

1) Limitations before March 15, 1998:

		kg/l	lb/gal
A)	Clear topcoat	0.67	(5.6)
B)	Opaque stain	0.56	(4.7)
C)	Pigmented coat	0.60	(5.0)
D)	Repair coat	0.67	(5.6)
E)	Sealer	0.67	(5.6)
F)	Semi-transparent stain	0.79	(6.6)
G)	Wash coat	0.73	(6.1)

BOARD NOTE: Prior to March 15, 1998, an owner or operator of a wood furniture coating operation subject to this Section must apply all coatings, with the exception of no more than 37.8 l (10 gal) of coating per day used for touch-up and repair operations, using one or more of the following application systems: airless spray application system, air-assisted airless spray application system, electrostatic spray application system, electrostatic bell or disc spray application system, heated airless spray application system, roller coating, brush or wipe coating application system, dip coating application system or high volume low pressure (HVLP) application system.)

2) On and after March 15, 1998, wood furniture sealers and topcoats must comply with one of the limitations specified in subsections (l)(2)(A) through (E):

			kg VOM/kg solids	lb VOM/lb solids
A)	Topcoat		0.8	(0.8)
B)	Sealers and topcoats with the following limits:			
	i)	Sealer other than acid-cured alkyd amino vinyl sealer	1.9	(1.9)

ii)	Topcoat other than acid-cured alkyd amino conversion varnish topcoat	1.8	(1.8)
iii)	Acid-cured alkyd amino vinyl sealer	2.3	(2.3)
iv)	Acid-cured alkyd amino conversion varnish topcoat	2.0	(2.0)

C) Meet the provisions of Section 219.215 for use of an averaging approach;

D) Achieve a reduction in emissions equivalent to the requirements of subsection (l)(2)(A) or (B), as calculated using Section 219.216; or

E) Use a combination of the methods specified in subsections (l)(2)(A) through (D).

3) Other wood furniture coating limitations on and after March 15, 1998:

		kg/l	lb/gal
A)	Opaque stain	0.56	(4.7)
B)	Non-topcoat pigmented coat	0.60	(5.0)
C)	Repair coat	0.67	(5.6)
D)	Semi-transparent stain	0.79	(6.6)
E)	Wash coat	0.73	(6.1)

4) Other wood furniture coating requirements on and after March 15, 1998:

A) A source subject to the limitations of subsection (l), (2) or (3) and utilizing one or more wood furniture coating spray booths must not use strippable spray booth coatings containing more than 0.8 kg VOM/kg solids (0.8 lb VOM/lb solids), as applied.

B) Any source subject to the limitations of subsection (l), (2) or (3) must comply with Section 219.217.

C) Any source subject to the limitations of subsection (l)(2)(A) or (B) and utilizing one or more continuous coaters, must for each

continuous coater, use an initial coating which complies with the limitations of subsection (l)(2)(A) or (B). The viscosity of the coating in each reservoir must always be greater than or equal to the viscosity of the initial coating in the reservoir. The owner or operator must:

i) Monitor the viscosity of the coating in the reservoir with a viscosity meter or by testing the viscosity of the initial coating and retesting the coating in the reservoir each time solvent is added;

ii) Collect and record the reservoir viscosity and the amount and weight of VOM per weight of solids of coating and solvent each time coating or solvent is added; and

iii) Maintain these records at the source for a period of three years.

m)	Prior to May 1, 2012: Plastic Parts Coating: Automotive/Transportation		kg/l	lb/gal
	1) Interiors			
	A) Baked			
		i) Color coat	0.49*	(4.1)*
		ii) Primer	0.46*	(3.8)*
	B) Air dried			
		i) Color coat	0.38*	(3.2)*
		ii) Primer	0.42*	(3.5)*
	2) Exteriors (flexible and non-flexible)			
	A) Baked			
		i) Primer	0.60*	(5.0)*
		ii) Primer non-flexible	0.54*	(4.5)*
		iii) Clear coat	0.52*	(4.3)*
		iv) Color coat	0.55*	(4.6)*

	B)	Air dried		
		i) Primer	0.66*	(5.5)*
		ii) Clear coat	0.54*	(4.5)*
		iii) Color coat (red & black)	0.67*	(5.6)*
		iv) Color coat (others)	0.61*	(5.1)*
3)	Specialty			
	A)	Vacuum metallizing basecoats, texture basecoats	0.66*	(5.5)*
	B)	Black coatings, reflective argent coatings, air bag cover coatings, and soft coatings	0.71*	(5.9)*
	C)	Gloss reducers, vacuum metallizing topcoats, and texture topcoats	0.77*	(6.4)*
	D)	Stencil coatings, adhesion primers, ink pad coatings, electrostatic prep coatings, and resist coatings	0.82*	(6.8)*
	E)	Head lamp lens coatings	0.89*	(7.4)*

BOARD NOTE: On and after May 1, 2012, the limitations in Section 219.204(q) apply to this category of coating.

n)	Prior to May 1, 2012: Plastic Parts Coating: Business Machine		kg/l	lb/gal
1)	Primer		0.14*	(1.2)*
2)	Color coat (non-texture coat)		0.28*	(2.3)*
3)	Color coat (texture coat)		0.28*	(2.3)*
4)	Electromagnetic interference/radio frequency interference (EMI/RFI) shielding coatings		0.48*	(4.0)*
5)	Specialty Coatings			

A)	Soft coat	0.52*	(4.3)*
B)	Plating resist	0.71*	(5.9)*
C)	Plating sensitizer	0.85*	(7.1)*

BOARD NOTE: On and after May 1, 2012, the limitations in Section 219.204(q) apply to this category of coating.

o) Flat Wood Paneling Coatings. On and after August 1, 2010, flat wood paneling coatings must comply with one of the following limitations:

1) 0.25 kg VOM/l of coatings (2.1 lb VOM/gal coatings); or

2) 0.35 kg VOM/l solids (2.9 lb VOM/gal solids).

BOARD NOTE: The Board has omitted subsection (p) and adopted a subsection (q) in order to preserve consistent labeling with similar requirements in 35 Ill. Adm. Code 218.

q) Miscellaneous Metal Parts and Products Coatings and Plastic Parts and Products Coatings On and After May 1, 2012. On and after May 1, 2012, the owner or operator of a miscellaneous metal or plastic parts coating line must comply with the limitations in subsection (q). The limitations in subsection (q) do not apply to aerosol coating products, powder coatings, or primer sealants and ejection cartridge sealants used in ammunition manufacturing. Primer sealants and ejection cartridge sealants are regulated under Subpart TT.

1) Metal Parts and Products. For purposes of this subsection (q)(1), "corrosion resistant basecoat" means a water-borne epoxy coating applied via an electrodeposition process to a metal surface prior to spray coating, for the purpose of enhancing corrosion resistance. The limitations in subsection (q)(1) do not apply to stencil coats, safety-indicating coatings, solid-film lubricants, electric-insulating and thermal-conducting coatings, magnetic data storage disk coatings, and plastic extruded onto metal parts to form a coating. The limitations in Section 219.219 apply to these coatings unless specifically excluded.

			kg VOM/l coating solids applied	lb VOM/gal coating solids applied
A)	General one component coating			
	i)	Air dried	0.34	0.54

			(2.8)	(4.52)
	ii)	Baked	0.28 (2.3)	0.40 (3.35)
B)	General multi-component coating			
	i)	Air dried	0.34 (2.8)	0.54 (4.52)
	ii)	Baked	0.28 (2.3)	0.40 (3.35)
C)	Camouflage coating		0.42 (3.5)	0.80 (6.67)
D)	Electric-insulating varnish		0.42 (3.5)	0.80 (6.67)
E)	Etching filler		0.42 (3.5)	0.80 (6.67)
F)	Extreme high-gloss coating			
	i)	Air dried	0.42 (3.5)	0.80 (6.67)
	ii)	Baked	0.36 (3.0)	0.61 (5.06)
G)	Extreme performance coating			
	i)	Air dried	0.42 (3.5)	0.80 (6.67)
	ii)	Baked	0.36 (3.0)	0.61 (5.06)
H)	Heat-resistant coating			
	i)	Air dried	0.42 (3.5)	0.80 (6.67)
	ii)	Baked	0.36 (3.0)	0.61 (5.06)

I)	High performance architectural Coating	0.42 (3.5)	0.80 (6.67)
J)	High temperature coating	0.42 (3.5)	0.80 (6.67)
K)	Metallic coating		
	i) Air dried	0.42 (3.5)	0.80 (6.67)
	ii) Baked	0.36 (3.0)	0.61 (5.06)
L)	Military specification coating		
	i) Air dried	0.34 (2.8)	0.54 (4.52)
	ii) Baked	0.28 (2.3)	0.40 (3.35)
M)	Mold-seal coating	0.42 (3.5)	0.80 (6.67)
N)	Pan backing coating	0.42 (3.5)	0.80 (6.67)
O)	Prefabricated architectural coating: multi-component		
	i) Air dried	0.42 (3.5)	0.80 (6.67)
	ii) Baked	0.28 (2.3)	0.40 (3.35)
P)	Prefabricated architectural coating: one-component		
	i) Air dried	0.42 (3.5)	0.80 (6.67)
	ii) Baked	0.28 (2.3)	0.40 (3.35)

Q)	Pretreatment coating	0.42 (3.5)	0.80 (6.67)
R)	Repair coats and touch-up coatings		
	i) Air dried	0.42 (3.5)	
	ii) Baked	0.36 (3.01)	
S)	Silicone release coating	0.42 (3.5)	0.80 (6.67)
T)	Solar-absorbent coating		
	i) Air dried	0.42 (3.5)	0.80 (6.67)
	ii) Baked	0.36 (3.0)	0.61 (5.06)
U)	Vacuum-metalizing coating	0.42 (3.5)	0.80 (6.67)
V)	Drum coating, new, exterior	0.34 (2.8)	0.54 (4.52)
W)	Drum coating, new, interior	0.42 (3.5)	0.80 (6.67)
X)	Drum coating, reconditioned, exterior	0.42 (3.5)	0.80 (6.67)
Y)	Drum coating, reconditioned, interior	0.50 (4.2)	1.17 (9.78)
Z)	Ammunition sealants		
	i) Air dried	0.42 (3.5)	0.80 (6.67)
	ii) Baked	0.36 (3.0)	0.61 (5.06)
AA)	Electrical switchgear compartment		

coatings

i)	Air dried		0.42 (3.5)	0.80 (6.67)
ii)	Baked		0.36 (3.0)	0.61 (5.06)

BB) All other coatings

i)	Air dried		0.40 (3.3)	0.73 (5.98)
ii)	Baked: primer/topcoat		0.34 (2.8)	0.54 (4.52)

2) Plastic Parts and Products: Miscellaneous. For purposes of this subsection (q)(2), miscellaneous plastic parts and products are plastic parts and products that are not subject to subsection (q)(3), (q)(4), (q)(5), or (q)(6). The limitations in subsection (q)(2) do not apply to touch-up and repair coatings; stencil coats applied on clear or transparent substrates; clear or translucent coatings; coatings applied at a paint manufacturing facility while conducting performance tests on the coatings; any individual coating category used in volumes less than 189.2 liters (50 gallons) in any one calendar year, if the total usage of all such coatings does not exceed 756.9 liters (200 gallons) per calendar year per source and substitute compliant coatings are not available; reflective coatings applied to highway cones; mask coatings that are less than 0.5 mm thick (dried) if the area coated is less than 25 square inches; electromagnetic interference/radio frequency interference (EMI/RFI) shielding coatings; and heparin-benzalkonium chloride (HBAC)-containing coatings applied to medical devices if the total usage of all such coatings does not exceed 378.4 liters (100 gallons) per calendar year per source. The limitations in Section 219.219 apply to these coatings unless specifically excluded.

		kg/l (lb/gal) coatings	kg/l (lb/gal) solids
A)	General one component coating	0.28 (2.3)	0.40 (3.35)
B)	General multi-component	0.42 (3.5)	0.80 (6.67)
C)	Electric dissipating coatings	0.80	8.96

	and shock-free coatings	(6.7)	(74.7)
D)	Extreme performance (2-pack coatings)	0.42 (3.5)	0.80 (6.67)
E)	Metallic coating	0.42 (3.5)	0.80 (6.67)
F)	Military specification coating		
	i) 1-pack coatings	0.28 (2.3)	0.54 (4.52)
	ii) 2-pack coatings	0.42 (3.5)	0.80 (6.67)
G)	Mold-seal coating	0.76 (6.3)	5.24 (43.7)
H)	Multi-colored coating	0.68 (5.7)	3.04 (25.3)
I)	Optical coating	0.80 (6.7)	8.96 (74.7)
J)	Vacuum-metalizing coating	0.80 (6.7)	8.96 (74.7)

3) Plastic Parts and Products Automotive/Transportation

		kg/l (lb/gal) coatings	kg/l (lb/gal) solids
A)	High bake coatings − interior and exterior parts		
	i) Flexible primer	0.54 (4.5)	1.39 (11.58)
	ii) Non-flexible primer	0.42 (3.5)	0.80 (6.67)
	iii) Basecoats	0.52 (4.3)	1.24 (10.34)

	iv)	Clear coat	0.48 (4.0)	1.05 (8.76)
	v)	Non-basecoat/clear coat	0.52 (4.3)	1.24 (10.34)
B)	Low bake/air dried coatings – exterior parts			
	i)	Primers	0.58 (4.8)	1.66 (13.80)
	ii)	Basecoat	0.60 (5.0)	1.87 (15.59)
	iii)	Clear coats	0.54 (4.5)	1.39 (11.58)
	iv)	Non-basecoat/clear coat	0.60 (5.0)	1.87 (15.59)
C)	Low bake/air dried coatings – interior parts			
	i)	Color coat	0.38 (3.2)	0.67 (5.66)
	ii)	Primer	0.42 (3.5)	0.80 (6.67)
D)	Touchup and repair coatings		0.62 (5.2)	2.13 (17.72)
E)	Specialty			
	i)	Vacuum metallizing basecoats	0.66 (5.5)	2.62 (21.8)
	ii)	Vacuum metallizing topcoats	0.77 (6.4)	6.06 (49.1)

F) Red, yellow, and black coatings: Subject coating lines must comply with a limit determined by multiplying the appropriate limit in subsections (q)(3)(A) through (q)(3)(C) by 1.15.

4) Plastic Parts and Products: Business Machine. The limitations of this subsection (q)(4) do not apply to vacuum metallizing coatings, gloss reducers, texture topcoats, adhesion primers, electrostatic preparation coatings, stencil coats, and resist coats other than plating resist coats. The limitations in Section 219.219 apply to these coatings unless specifically excluded.

		kg/l (lb/gal) coatings	kg/l (lb/gal) solids
A)	Primers	0.35 (2.9)	0.57 (4.80)
B)	Topcoat	0.35 (2.9)	0.57 (4.80)
C)	Color coat (texture coat)	0.28 (2.3)	0.40 (4.80)
D)	Color coat (non-texture coat)	0.28 (2.3)	0.40 (4.80)
E)	Texture coats other than color texture coats	0.35 (2.9)	0.57 (4.80)
F)	EMI/RFI shielding coatings	0.48 (4.0)	1.05 (8.76)
G)	Fog coat	0.26 (2.2)	0.38 (3.14)
H)	Touchup and repair	0.35 (2.9)	0.57 (4.80)

5) Pleasure Craft Surface Coatings

		kg/l (lb/gal) coatings	kg/l (lb/gal) solids
A)	Extreme high gloss coating – topcoat	0.60 (5.0)	1.88 (15.6)
B)	High gloss coating − topcoat	0.42	0.80

		(3.5)	(6.7)
C)	Pretreatment wash primer	0.78 (6.5)	6.67 (55.6)
D)	Finish primer surfacer		
	Prior to January 1, 2014	0.60 (5.0)	1.88 (15.6)
	On and after January 1, 2014	0.42 (3.5)	0.80 (6.7)
E)	High build primer/surfacer	0.34 (2.8)	0.55 (4.6)
F)	Aluminum substrate antifoulant coating	0.56 (4.7)	1.53 (12.8)
G)	Other substrate antifoulant coating	0.40 (3.3)	0.73 (5.8)
H)	Antifouling Sealer/Tie Coat	0.42 (3.5)	0.80 (6.7)
I)	All other pleasure craft surface coating for metal or plastic	0.42 (3.5)	0.80 (6.7)

6) Motor Vehicle Materials

		kg/l (lb/gal) coatings
A)	Cavity wax	0.65 (5.42)
B)	Sealer	0.65 (5.42)
C)	Deadener	0.65 (5.42)
D)	Gasket/gasket sealing material	0.20 (1.67)

E)	Underbody coating	0.65 (5.42)
F)	Trunk interior coating	0.65 (5.42)
G)	Bedliner	0.20 (1.67)
H)	Lubricating wax/compound	0.70 (5.84)

r) Aerospace Facilities. On and after July 1, 2021, the owner or operator of an aerospace facility must comply with the coating limitations in this subsection (r). The limitations in this subsection (r) do not apply to the following activities in which coating of aerospace components and vehicles may take place: research and development, quality control, laboratory testing, and electronic parts and assemblies (except for coating of completed assemblies). The limitations in this subsection (r) also do not apply to aerospace facility operations involving space vehicles or rework operations performed on antique aerospace vehicles or components. The coating limitations in subsections (r)(1) and (r)(2) do not apply to the use of separate formulations of primers, topcoats, and chemical milling maskants, or the use of separate formulations of specialty coatings, in volumes of less than 50 gallons per year, subject to a maximum exemption of 200 gallons for all such formulations applied annually. The coating limitations in subsection (r)(2) do not apply to aerosol coatings or Department of Defense classified coatings.

1) VOM Content Limitations for Primers, Topcoats, and Chemical Milling Maskants

		kg/l	lb/gal
A)	Aerospace primer	0.350	(2.9)
B)	Primer for general aviation rework facility	0.540	(4.5)
C)	Exterior primer for large commercial aircraft (components or fully assembled)	0.650	(5.4)
D)	Topcoat	0.420	(3.5)
E)	Topcoat for general aviation rework facility	0.540	(4.5)

F)	Self-priming topcoat for aerospace applications	0.420	(3.5)
G)	Self-priming topcoat for general aviation rework facility	0.540	(4.5)
H)	Chemical milling maskant, type I	0.622	(5.2)
I)	Chemical milling maskant, type II	0.160	(1.3)

2) VOM Content Limitations for Aerospace Specialty Coatings

		kg/l	lb/gal
A)	Ablative coating	0.600	(5.0)
B)	Adhesion promoter for aerospace applications	0.890	(7.4)
C)	Adhesive bonding primer cured above 250 °F	1.030	(8.6)
D)	Adhesive bonding primer cured at or below 250 °F	0.850	(7.1)
E)	Aerospace flexible primer	0.640	(5.3)
F)	Aerospace pretreatment coating	0.780	(6.5)
G)	Antichafe coating	0.660	(5.5)
H)	Bearing coating	0.620	(5.2)
I)	Bonding maskant	1.230	(10.3)
J)	Caulking and smoothing compounds	0.850	(7.1)
K)	Chemical agent-resistant coating	0.550	(4.6)
L)	Clear coating for aerospace applications	0.720	(6.0)
M)	Commercial exterior aerodynamic structure primer	0.650	(5.4)

N)	Commercial interior adhesive	0.760	(6.3)
O)	Compatible substrate primer	0.780	(6.5)
P)	Corrosion prevention system	0.710	(5.9)
Q)	Critical use and line sealer maskant	1.020	(8.5)
R)	Cryogenic flexible primer	0.645	(5.4)
S)	Cryoprotective coating	0.600	(5.0)
T)	Cyanoacrylate adhesive	1.020	(8.5)
U)	Dry lubricative material for aerospace applications	0.880	(7.3)
V)	Electrostatic discharge and electromagnetic interference coating	0.800	(6.7)
W)	Elevated temperature Skydrol-resistant commercial primer	0.740	(6.2)
X)	Epoxy-polyamide topcoat	0.660	(5.5)
Y)	Extrudable, rollable, or brushable sealant for aerospace applications	0.280	(2.3)
Z)	Fire-resistant interior coating	0.800	(6.7)
AA)	Flight test coatings: missile or single use aircraft	0.420	(3.5)
BB)	Flight test coatings: all other	0.840	(7.0)
CC)	Fuel tank adhesive for aerospace applications	0.620	(5.2)
DD)	Fuel tank coating for aerospace applications	0.720	(6.0)
EE)	High temperature coating	0.850	(7.1)

FF)	Insulation covering	0.740	(6.2)
GG)	Intermediate release coating	0.750	(6.3)
HH)	Lacquer	0.830	(6.9)
II)	Metallized epoxy coating	0.740	(6.2)
JJ)	Mold release coating for aerospace applications	0.780	(6.5)
KK)	Nonstructural adhesive for aerospace applications	0.360	(3.0)
LL)	Optical anti-reflective coating	0.750	(6.3)
MM)	Part marking aerospace coating	0.850	(7.1)
NN)	Radiation-effect or electric coating	0.800	(6.7)
OO)	Rain erosion-resistant coating	0.850	(7.1)
PP)	Rocket motor bonding adhesive	0.890	(7.4)
QQ)	Rocket motor nozzle coating	0.660	(5.5)
RR)	Rubber-based adhesive	0.850	(7.1)
SS)	Scale inhibitor	0.880	(7.3)
TT)	Screen print ink for aerospace applications	0.840	(7.0)
UU)	Seal coat maskant	1.230	(10.3)
VV)	Sprayable sealant for aerospace applications	0.600	(5.0)
WW)	Silicone insulation material	0.850	(7.1)
XX)	Solid film lubricant	0.880	(7.3)
YY)	Specialized function coating	0.890	(7.4)
ZZ)	Structural autoclavable adhesive		

	for aerospace applications	0.060	(0.5)
AAA)	Structural nonautoclavable adhesive for aerospace applications	0.850	(7.1)
BBB)	Temporary protective coating for aerospace applications	0.320	(2.7)
CCC)	Thermal control coating for aerospace applications	0.800	(6.7)
DDD)	Wet fastener installation coating	0.675	(5.6)
EEE)	Wing coating	0.850	(7.1)

(Source: Amended at 49 Ill. Reg. _____, effective _____)