ILLINOIS POLLUTION CONTROL BOARD
September 11, 2025

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| 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 | ) | |

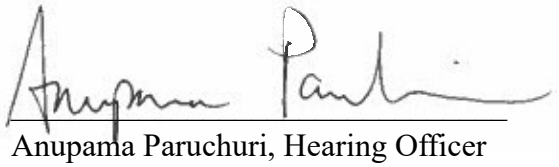
**HEARING OFFICER ORDER**

On June 12, 2025, the Illinois Environmental Protection Agency (IEPA) filed a proposal to amend Part 219 of the Board's air pollution regulations. On June 26, 2025, the Board accepted IEPA's proposal and directed the hearing officer to schedule and proceed to hearing. Without commenting on the merits of the proposal, the Board directed its Clerk to submit the proposal to first-notice publication. *See* 49 Ill. Reg. 8883 (Jul. 11, 2025). The hearing officer scheduled the first hearing for Thursday, September 18, 2025, with the deadline to pre-file testimony by Friday, August 15, 2025. On that date, the Agency pre-filed the testimony of Mr. Rory Davis.

The Board and its staff have reviewed the Agency's pre-filed testimony and submit with this order their questions, included as **Attachment A**. Anyone may respond to the attached questions, as well as any other pre-filed questions in the record.

All filings in this proceeding will be available on the Board's website at https://pcb.illinois.gov in the rulemaking docket R25-25. Unless the Board, hearing officer, Clerk, or procedural rules provide otherwise, all documents in this proceeding must be filed electronically through the Clerk's Office On-Line. 35 Ill. Adm. Code 101.302(h), 101.1000(c), 101.Subpart J.

IT IS SO ORDERED.



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ATTACHMENT A
Hearing Officer Order of September 11, 2025

1. On Page 1 of the Technical Support Document (TSD), the Illinois Environmental Protection Agency (IEPA or Agency) notes that it has consulted with representatives of one of the three potentially affected sources in Illinois regarding the proposed amendments to allow an existing exemption to include additional categories of aerospace coatings to be consistent with the aerospace CTG (Control Techniques Guidelines for Control of Volatile Organic Compound Emissions from Coating Operations at Aerospace Manufacturing and Rework Operations) and aerospace NESHAP (the National Emission Standards for Hazardous Air Pollutants for Aerospace Manufacturing and Rework Operations).

    **a.** Please clarify the name of the potentially affected source consulted by the Agency.

    **b.** Comment on whether the Agency was approached by the potentially affected source to include additional categories of aerospace coatings to the existing exemption for specialty coatings or this rulemaking was triggered by IEPA's review.

    **c.** Does the source consulted by the Agency in preparing the proposed amendments use primers, topcoats and chemical milling maskants in its operations? If so, does the Agency have any information about the annual volumes of the coatings used by the affected source?

    **d.** Did the Agency try to contact the other two potentially affected sources regarding the exemptions for additional coating categories? If so, comment on whether these sources will be able to use the proposed exemptions.

    **e.** Please provide contact information for Gulfstream Aerospace Services Corporation and Premiere Air Center, Inc., so they can be added to the Notice List of this proceeding.

2. On page 4 of the TSD, IEPA notes that the "proposed revision would amend the aerospace coating regulations to allow primers, topcoats and chemical milling maskants to also be included in the low volume exemption in volumes of less than 50 gallons per year, and the source would still be subject to the same maximum exemption of 200 gallons total for all such formulations applied annually." Please clarify whether the 200 gallons per year limit applies to the combined volume of specialty coatings, primers, topcoats and chemical milling maskants used at a source.

3. Regarding demonstration of noninterference under Section 110(l) of the CAA, IEPA states that the proposed revisions will not result in "additional emissions of any pollutant at existing sources in Illinois as the revisions only make Illinois' regulation more consistent with the aerospace CTG and aerospace NESHAP and will not allow additional allowable emissions

since the existing maximum exemption of 200 gallons per year for all formulations combined remains the same." TSD at 4-5.

**a.** Please comment on whether the VOM contents of primers, topcoats and chemical milling maskants being included under the low volume exemption are comparable to the already exempted specialty coatings.

**b.** If the VOM contents of the formulations being added are higher, would the expanded exemption result in an increase VOM emissions from the affected sources?

**4.** For Section 219.204(r)(1): The aerospace CTG's model rule specifies that the low-volume exemption applies to Type I and Type II chemical milling maskants. The Board's definition of "chemical milling maskants" at Section 211.985 includes only Type I and Type II and excludes specialty coatings. The exemption as proposed by IEPA does not specify the type of maskant. Does IEPA object to clarifying the proposed amendment as follows (revisions in bold)?

> The coating limitations in subsections (r)(1) and (r)(2) do not apply to ~~aerosol coatings, Department of Defense classified coatings, or~~ the use of separate formulations of primers, topcoats, and **Type I and Type II** chemical milling maskants, or the use of separate formulations of ~~aerospace~~ 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.

**5.** For Section 219.204(r)(2): The aerospace CTG's model rule exempts touch-ups of specialty coatings regardless of the volume used. 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)."

**a.** Is Section 219.204(r) currently more stringent than the model rule for touch-ups of specialty coatings? If so, please explain whether the proposed amendments will relax the standards for these touch-ups.

**b.** Should Section 219.204(r) include language to distinguish between touch-ups and low-volume use of specialty coatings? Unlike the model rules, it currently does not include a reference to touch-ups of specialty coatings.

**6.** Has IEPA received any indication from USEPA that the amendments as proposed will be approved as a SIP revision?

**7.** Has IEPA received any indication from USEPA that the existing aerospace rules in Part 219 are deficient or otherwise require amending? If so, please elaborate.

**8.** By allowing additional exemptions, will the proposed amendments result in increased VOM emissions in Illinois – measured source-wide, annually, or by any other metric?