

January 17, 2008

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Clerk's Office
Attention Docket #2008-017
Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph
Suite 11-500
Chicago, Illinois 60601

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JAN 22 2008

STATE OF ILLINOIS
Pollution Control Board

PC# 1

RE: **Illinois EPA Architectural and Industrial Maintenance (AIM) Coatings;
Docket #2008-017; Final Draft; NPCA Comments**

To Whom it May Concern:

The National Paint and Coatings Association (NPCA)¹ submits the following comments on the final draft amendments to the Illinois EPA (ILEPA) AIM rulemaking. NPCA appreciates the changes that ILEPA has made to the AIM rulemaking in response to our comments to date.

Section 223.330 Recordkeeping and Reporting Requirements

NPCA is concerned that the proposed reporting requirements are burdensome, especially the requirements that reports would need to be provided within 30 days of written notice. Most other states allow 90 days for these reports to be submitted upon request. However, it has been our experience that few if any states have actually requested this type of data because reporting of this information is burdensome and as much of it is confidential information it requires special handling – all of which does not commensurate with the need or use of the data that would be collected.

In addition, the reporting requirements found in Section 223.330 originated from the California Air Resources Board (CARB) 2000 AIM Suggested Control Measure and were subsequently included in the Ozone Transport Commission (OTC) "model rule" (the IL AIM rule is modeled after the OTC model rule). In October 2007 – CARB deleted these requirements from the 2007 AIM SCM since it felt that this information was no longer needed. Thus, NPCA questions whether or not ILEPA continues to need this information, especially considering the burden it places on manufacturers.

NPCA respectfully requests ILEPA either delete these reporting requirements, as CARB has done, or allow industry 90 days to submit these reports.

¹ NPCA is a voluntary, nonprofit trade association representing some 350 manufacturers of paints, coatings, adhesives, sealants, and caulks, raw materials suppliers to the industry, and product distributors. As the preeminent organization representing the coatings industry in the United States, NPCA's primary role is to serve as ally and advocate on legislative, regulatory and judicial issues at the federal, state, and local levels. In addition, NPCA provides members with such services as research and technical information, statistical management information, legal guidance, and community service project support.



Section 223.320(c) Container Labeling Requirements

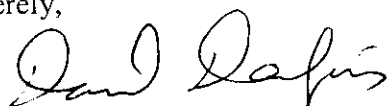
As written, ILEPA requires the "VOM Content" of the coating to be displayed on the can. While we appreciate ILEPA making the clarification in the AIM definitions section that "VOC Content" has the same meaning as "VOM Content" we are concerned that there will still be confusion as to whether the "VOM Content" or "VOC Content" needs to be displayed. NPCA respectfully requests ILEPA include language in Section 223.320(c) clarifying that either the "VOM Content" or "VOC Content" may be displayed on the can.

Section 223.310 Standards - Nuclear Coatings

Please note that the proposed rule has Nuclear Coatings listed at 550 g/l, which is 100 g/l higher than the National Rule. To be consistent with the National AIM rule and the OTC AIM rules – NPCA suggests ILEPA lower the limit for Nuclear Coatings to 450 g/l.

Thank you for your consideration of our comments. Please do not hesitate to contact us if you have any questions or need additional information.

Sincerely,



David F. Darling, P.E.,
Director, Environmental Affairs



Alison Keane
Counsel, Government Affairs

**** Sent via email and in hard-copy ****