



Benjamin Moore®
Paints

November 19, 2008

John Therriault, Chief Clerk
Clerk's Office
Attention Docket #R09-08
Illinois Pollution Control Board
100 W. Randolph, Suite 11-500
Chicago, Illinois 60601

PC #10

RECEIVED
CLERK'S OFFICE
NOV 24 2008
STATE OF ILLINOIS
Pollution Control Board

**RE: Illinois EPA Architectural and Industrial Maintenance (AIM) Coatings;
Docket #R09-08**

08-17

Dear Mr. Therriault:

Benjamin Moore & Co. has been making quality paints for over 125 years. Through those years, we have adapted to and complied with ever changing environmental regulations. Currently Benjamin Moore has one warehouse located in the state of Illinois. We believe that it is unrealistic to be able to comply with the short compliance timeframe because sufficient time is needed to convert our warehouse to compliant stock, communicate changes internally, to independent retailer, contractors, architects, and do-it-yourself consumers, and revise internal systems and procedures. Also with the new AIM amendments, in addition to changing formulations, we will need to develop and print new labels for the reformulated products.

Benjamin Moore & Co. is a member of the National Paint & Coatings Association (NPCA) and supports NPCA's request to extend the implementation date of the AIM rulemaking from January 1, 2009 to July 1, 2009 to allow the state of Illinois adequate time to finalize and adopt the amendments to the AIM rule, and more importantly, provide adequate time for industry to make necessary changes in order to comply with the amendments.

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

Sincerely,

W. Kip Cleverley, CHMM
Director, Environment, Health & Safety, Product Stewardship & Facilities
kip.cleverley@benjaminmoore.com

SUNNYSIDE CORPORATION

225 Carpenter Avenue □ Wheeling, Illinois 60090-6095 □ 847 / 541-5700 □ FAX # 847 / 541-9043



November 21, 2008

Mr. John Therriault
Chief Clerk; Clerk's Office
Illinois Pollution Control Board
100 W. Randolph, Suite 11-500
Chicago, Illinois 60601

PC #11

RECEIVED
CLERK'S OFFICE

NOV 24 2008

STATE OF ILLINOIS
Pollution Control Board

**Re: Illinois EPA Architectural and Industrial Maintenance (AIM) Coatings;
Docket #R09-08**

08-17

Dear Mr. Therriault:

Sunnyside Corporation is a fourth generation, family-owned business founded in Chicago in 1893, and first incorporated in the State in 1921. We are proud of our Illinois heritage, our dedicated employees and our role as a good neighbor and responsible corporate citizen.

As a long-standing member of the National Paint & Coatings Association (NPCA), Sunnyside Corporation supports NPCA's request to extend the implementation date of the AIM rulemaking from January 1, 2009, to allow adequate time to finalize and adopt effective, achievable objectives for the amendments to the AIM rule, and allow Industry time to make necessary product changes in order to comply with the finalized AIM Amendments.

Paint & coatings manufacturers, as well as manufacturers of allied products, will reformulate literally thousands of products and conduct testing to confirm not only compliance, but confirm that new, reformulated products actually *perform* for the end user. New product labels will need writing, and computer systems and other "lock-out" tools upgraded to prevent shipment of "non-compliant" product into the State of Illinois. Additionally, effectively communicating the new AIM Amendments and their significance to all downstream participants in the market channel requires precious corporate resources, already stretched because of the current economy, and time. Finally, a "sell-through" period is typically established so product in the process of manufacture and product in the market channel can be sold prior to the effective date of the Amendments.

Sunnyside Corporation respectfully requests that the AIM rulemaking implementation date be moved to a date following adoption of a final rule, and to a date that also gives consideration to the practical issues outlined above. Thank you for your consideration and you may feel free to contact me directly, should you have any questions or comments.

Sincerely,

Robert J. Lueders
President



Manufacturer of Bruning and Kyanize Paints

November 19, 2008

John Therriault, Chief Clerk
Clerk's Office
Attention Docket #R09-08
Illinois Pollution Control Board
100 W. Randolph, Suite 11-500
Chicago, Illinois 60601

PC #12

RECEIVED
CLERK'S OFFICE
NOV 24 2008
STATE OF ILLINOIS
Pollution Control Board

**RE: Illinois EPA Architectural and Industrial Maintenance (AIM) Coatings;
Docket #R09-08**

08-17

Dear Mr. Therriault:

My name is Jim Boyce and I represent Insl-x Products Corp. We are the parent company of Bruning Paint, Insl-x Products, Coronado Paint, Lenmar Wood Finishes, and Trinity Coatings. Although we do not manufacture in Illinois, we do operate a rather large distribution center in Elk Grove Village, IL

Insl-x Products Corp. is a member of the National Paint & Coatings Association (NPCA) and supports NPCA's request to extend the implementation date of the AIM rulemaking from January 1, 2009 to July 1, 2009 to allow IL adequate time to finalize and adopt the amendments to the AIM rule, and more importantly, provide adequate time for industry to make necessary changes in order to comply with the amendments. The logistics of implementing the steps needed to meet this regulation in less than 2 months would be very difficult for any company and puts an unnecessary burden on our industry during a very difficult time

With the new AIM amendments, in addition to changing thousands of formulations, paint manufacturers need to develop and print new labels for the reformulated products. Further, computer systems and other "lock-out" systems need to be upgraded to prevent shipment of "non-compliant" products into IL. In addition, it will take significant time for manufacturers to properly communicate the new VOC limit changes to all distributors, customers and specifiers in order to ensure their compliance with the new products. It is impossible for manufacturers to make these necessary changes and properly communicate the details of the IL AIM rule without having a final adopted rule in hand, particularly, as additional changes may occur between now and the final adoption. Therefore, Insl-x Products Corp. strongly believes that the implementation date must be moved to July 1, 2009.

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

Sincerely,

Director of Technical Services

Insl-x Products Corporation

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