

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

IN THE MATTER OF: )  
 )  
REASONABLY AVAILABLE CONTROL ) R10-20  
TECHNOLOGY (RACT) FOR VOLATILE ) (Rulemaking-Air)  
ORGANIC MATERIAL EMISSIONS FROM )  
GROUP IV CONSUMER & COMMERCIAL )  
PRODUCTS: PROPOSED AMENDMENTS )  
TO 35 ILL. ADM. CODE 211, 218, and 219 )

**NOTICE**


To: John Therriault, Assistant Clerk  
Illinois Pollution Control Board  
James R. Thompson Center  
100 West Randolph, Suite 11-500  
Chicago, Illinois 60601-3218

**SEE ATTACHED SERVICE LIST**

PLEASE TAKE NOTICE that I have today filed with the Office of the Pollution Control Board the POST-HEARING COMMENTS OF THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY and MOTION TO AMEND RULEMAKING PROPOSAL of the Illinois Environmental Protection Agency, copies of which are herewith served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By   
Dana Vetterhoffer  
Assistant Counsel  
Division of Legal Counsel

DATED: May 17, 2010

1021 N. Grand Ave. East  
P.O. Box 19276  
Springfield, IL 62794-9276  
(217) 782-5544

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**POST-HEARING COMMENTS OF THE ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY**

The ILLINOIS ENVIRONMENTAL PROTECTION AGENCY (“Illinois EPA” or “Agency”), by its attorneys, hereby submits its post-hearing comments in the above rulemaking proceeding. The Illinois EPA has reviewed the transcript of the April 28, 2010, hearing and responds to the information requested at hearing as follows. Other requests are addressed in the Agency’s Motion to Amend Rulemaking Proposal, filed concurrently with these post-hearing comments:

1. The Agency was asked to clarify whether the Agency views chronic exposure differently than repeated exposure for purposes of the definition of “extreme performance coating.” (Transcript 23.15). In this context, the Agency views chronic exposure as encompassing both repeated exposure as well as ongoing exposure.
2. The Agency was asked whether there is a state or federal definition distinguishing industrial grade solvents from other solvents. (Transcript at 25.11). The Agency is currently unaware of any such definition.
3. The Agency was asked whether industrial grade solvents are marketed as such. (Transcript at 26.6). The Agency believes that certain solvents are marketed and packaged for use in industrial settings and would not be generally available to the average consumer.
4. The Agency was asked whether the definition of “military specification coating” includes sealants used in ammunition manufacturing. (Transcript 29.8). The Agency does not intend “military specification coating” to include these sealants. Primer sealants used in ammunition manufacturing are currently regulated under Subpart TT of Parts 218 and 219, and the Agency intends that they continue to be regulated as such. Mouth

waterproofing sealants and cap sealants used in ammunition manufacturing are currently regulated as clear coatings or extreme performance coatings under Section 218/219.204(j). In its Motion to Amend Rulemaking Proposal, the Agency has proposed a new coating category for these sealants under proposed Section 218/219.204(q)(1).

5. The Agency was asked to provide the United States Environmental Protection Agency's ("USEPA") rationale for requiring a 90% capture and control efficiency for add-on controls for miscellaneous metal and plastic parts coatings, but only 85% efficiency for controls for miscellaneous industrial adhesives. (Transcript at 30.19). The Illinois EPA is unaware of the analyses employed by USEPA in arriving at these particular efficiency requirements. The Illinois EPA has requested the information from USEPA, and will supplement its post-hearing comments when such information is available.
6. The Agency was asked whether fiberglass boat manufacturing facilities subject to the proposed rule are also subject to additional state volatile organic material ("VOM") requirements, like the 8 lb/hour rule. (Transcript at 35.9).

Sources subject to the Illinois EPA's proposal regarding fiberglass boat manufacturing materials are also subject to all other applicable state VOM requirements, including the 8 lb/hour rule.

7. The Agency was asked to comment on whether additional state requirements could deter new fiberglass boat manufacturing facilities from being constructed in Illinois nonattainment areas ("NAAs"). (Transcript 36.11). On a similar note, the Agency was asked to comment on the merits of exempting fiberglass boat manufacturing facilities complying with the proposed regulations from additional state VOM requirements. (Transcript at 36.14).

The Illinois EPA does not recommend exempting sources subject to the proposed Subpart II from other state VOM regulations. Fiberglass boat manufacturing facilities located inside and outside Illinois NAAs are already regulated by a National Emissions Standard for Hazardous Air Pollutants ("NESHAP") for the category. The limitations recommended in the Control Techniques Guidelines ("CTG") for fiberglass boat manufacturing materials are largely based on this NESHAP, and generally reflect the current state of the industry. Therefore, while the 8 lb/hr rule may deter new sources from operating in Illinois in general, exempting sources in the NAAs alone from the 8 lb/hr rule would incentivize sources to operate within the NAAs, and put attainment area sources (which would still be required to comply with both the NESHAP and the 8 lb/hour rule) at a disadvantage.

The Agency is aware of two fiberglass molding operations located in Illinois attainment areas that currently operate with adjusted standards. Obtaining an adjusted standard would also be an option for a new source located in an Illinois NAA, and would be considered by the Agency and the Board on a case by case basis. In the meantime, the Agency does not recommend exempting a source operating in a NAA from the 8 lb/hr

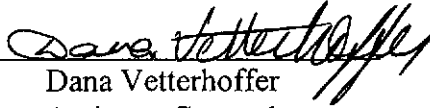
rule based solely on theoretical difficulties the source may or may not face in complying with such rule.

8. The Agency was asked to provide contact information for the American Architectural Manufacturers Association ("AAMA"). (Transcript at 38.15). The AAMA's address is 1827 Walden Office Square, Suite 550, Schaumburg, IL 60173-4268.
9. The Agency was asked whether the definition of "Bedliner" in Section 211.715 should apply only to automobile and light-duty truck coatings. (Transcript 40.1). The CTG for Automobile and Light-Duty Truck Assembly Coatings and the CTG for Miscellaneous Metal and Plastic Parts Coatings both contain a similar definition for "bedliner." The only difference is that the automobile/light-duty truck definition applies at facilities that manufacture automobiles and light-duty trucks. The miscellaneous metal and plastic parts definition applies at all other facilities. Consequently, the Agency does not recommend restricting the definition of "bedliner" to automobile and light-duty truck facilities.
10. The Agency was asked to clarify what the term "Cielab" in Section 211.5400 references. (Transcript at 43.3). "CIE" stands for *Comission Internationale de l'Eclairage* (International Commission on Illumination). It is an independent international board that sets various lighting standards. "CIELAB" is one of two systems adopted by CIE in 1976 as models that show uniform color spacing in their values.
11. The Agency was asked why certain definitions are contained in Parts 218 and 219 instead of in Part 211. (Transcript at 43.22). Specifically, the Agency was asked why definitions for "corrosion resistant basecoat" and "marine engine coating" are included in Section 218/219.204(q)(1), which sets forth the Agency's proposed VOM limitations for metal parts and products coatings. The Agency included these two definitions in (q)(1) because the definitions are currently part of 218/219.204(j), which sets forth the existing metal parts and products coatings limitations. The Agency kept the definitions in Section 218/219.204 for consistency's sake, but has no objection to moving the definitions into Part 211 instead.
12. The Agency was asked why Section 219.208(b)(1) references Subpart Z dry cleaners, but 218.208(b)(1) does not. (Transcript at 45.9). The Agency reviewed prior rulemakings and determined that, when these regulations were first promulgated in Part 218 in 1991, Subpart Z was in fact referenced in Section 218.208(b)(1). The Agency is unaware of any subsequent rulemaking that proposed deletion of Subpart Z from Part 218, and is therefore uncertain as to why it is no longer referenced.
13. The Agency was asked why the Agency's proposed Section 218/219.204(q) was not instead lettered "(o)" or "(p)." In R10-8, the Agency proposed adding to Section 218/219.204 a category for flat wood paneling coatings. In Part 219, the category is in a subsection lettered as "(o)" and in 218, it is lettered as "(p)" (because there is one more existing coating category in Part 218 than in Part 219). In the present rulemaking, the Agency, assuming that R10-8 will eventually be finalized, used "(q)" for the next coating

category. Many coating subcategories are addressed in (q), and the Agency believed using the same subsection letter for both Parts 218 and 219 would reduce confusion and simplify references.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By:   
Dana Vetterhoffer  
Assistant Counsel  
Division of Legal Counsel

DATED: May 17, 2010

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**MOTION TO AMEND RULEMAKING PROPOSAL**

The Proponent, the Illinois Environmental Protection Agency (“Illinois EPA”), by its attorney, and pursuant to 35 Ill. Adm. Code 101.500 and 102.402, moves that the Illinois Pollution Control Board (“Board”) amend Parts 211, 218, and 219 of this rulemaking proposal.

In support of its Motion, the Illinois EPA states as follows:

1. On March 8, 2010, the Illinois EPA filed a proposal with the Board to amend 35 Ill. Adm. Code Parts 211, 218, and 219 to control the emissions of volatile organic materials (“VOM”) from Group IV Consumer and Commercial Product categories. The Illinois EPA proposes the following amendments to its proposal.

2. At the April 28, 2010, hearing regarding the rulemaking proposal (“hearing”), the Agency agreed to consider including the use of formulation data as an option for calculating VOM content of miscellaneous industrial adhesives. (Transcript at 16.23). The Agency recommends inclusion of this option as follows:

Section 218.902 Testing Requirements

- a) .....
- b) Testing to demonstrate compliance with the VOM content limitations in Section 218.901(b) of this Subpart shall be conducted as follows.

- 1) Method 24, incorporated by reference in Section 218.112 of this Part, shall be used for non-reactive adhesives. If it is demonstrated to the satisfaction of the Agency and the USEPA that plant adhesive formulation data are equivalent to Method 24 results, formulation data may be used. In the event of any inconsistency between a Method 24 test and a facility's formulation data, the Method 24 test will govern;

Section 219.902 Testing Requirements

- a) .....
- b) Testing to demonstrate compliance with the VOM content limitations in Section 219.901(b) of this Subpart shall be conducted as follows.
  - 1) Method 24, incorporated by reference in Section 219.112 of this Part, shall be used for non-reactive adhesives. If it is demonstrated to the satisfaction of the Agency and the USEPA that plant adhesive formulation data are equivalent to Method 24 results, formulation data may be used. In the event of any inconsistency between a Method 24 test and a facility's formulation data, the Method 24 test will govern;

3. At hearing, the Agency was asked whether it should add a provision to its proposal specifying that sources exempt from Subpart JJ because of the criteria in Section 218/219.900(a) must show continued compliance or periodically measure their emissions. (Transcript at 14.10).

The Illinois EPA recommends amending Section 218/219.904(a) to include a recordkeeping requirement as follows:

Section 218.904 Recordkeeping and Reporting Requirements

- a) The owner or operator of a source exempt from the limitations of this Subpart because of the criteria in Section 218.900(a) of this Subpart shall comply with the following:
  - 1) By May 1, 2011, or upon initial start-up of the source, whichever is later, submit a certification to the Agency that includes:
    - A) A declaration that the source is exempt from the requirements of this Section because of the criteria in Section 218.900(a);
    - B) Calculations which demonstrate that combined emissions of VOM from miscellaneous industrial adhesive application operations at the source, including related cleaning activities, never equal or

exceed 6.8 kg/day (15 lbs/day), in the absence of air pollution control equipment. To calculate daily emissions of VOM, the owner or operator shall determine the monthly emissions of VOM from miscellaneous industrial adhesive application operations at the source (including related cleaning activities) and divide this amount by the number of days during that calendar month that miscellaneous industrial adhesive application operations at the source were in operation;

- 2) Collect and record the following information each day for each miscellaneous industrial adhesive application operation, maintain the information at the source for a period of three years, and provide the information to the Agency upon request:
  - A) The name and identification number of each adhesive as applied by each miscellaneous industrial adhesive application operation; and
  - B) The weight of VOM per volume and the volume of each adhesive (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day by each miscellaneous industrial adhesive application operation;
- 3) Notify the Agency of any record that shows that the combined emissions of VOM from miscellaneous industrial adhesive application operations at the source, including related cleaning activities, ever equal or exceed 6.8 kg/day (15 lbs/day), in the absence of air pollution control equipment, within 30 days after the event occurs, and provide copies of such record(s) upon request by the Agency.

Section 219.904 Recordkeeping and Reporting Requirements

- a) The owner or operator of a source exempt from the limitations of this Subpart because of the criteria in Section 219.900(a) of this Subpart shall comply with the following:
  - 1) By May 1, 2011, or upon initial start-up of the source, whichever is later, submit a certification to the Agency that includes:
    - A) A declaration that the source is exempt from the requirements of this Section because of the criteria in Section 219.900(a);
    - B) Calculations which demonstrate that combined emissions of VOM from miscellaneous industrial adhesive application operations at the source, including related cleaning activities, never equal or exceed 6.8 kg/day (15 lbs/day), in the absence of air pollution control equipment. To calculate daily emissions of VOM, the



owner or operator shall determine the monthly emissions of VOM from miscellaneous industrial adhesive application operations at the source (including related cleaning activities) and divide this amount by the number of days during that calendar month that miscellaneous industrial adhesive application operations at the source were in operation;

2) Collect and record the following information each day for each miscellaneous industrial adhesive application operation, maintain the information at the source for a period of three years, and provide the information to the Agency upon request:

A) The name and identification number of each adhesive as applied by each miscellaneous industrial adhesive application operation; and

B) The weight of VOM per volume and the volume of each adhesive (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day by each miscellaneous industrial adhesive application operation;

3) Notify the Agency of any record that shows that the combined emissions of VOM from miscellaneous industrial adhesive application operations at the source, including related cleaning activities, ever equal or exceed 6.8 kg/day (15 lbs/day), in the absence of air pollution control equipment, within 30 days after the event occurs, and provide copies of such record(s) upon request by the Agency.

4. In response to a request at hearing, the Agency recommends amending Section 211.200 to make the title of the Section consistent with the definition:

Section 211.200 Acrylonitrile-Butadiene-Styrene (ABS) Welding

“Acrylonitrile-butadiene-styrene (ABS) welding” means, for purposes of Subpart JJ of Parts 218 and 219, any process to weld acrylonitrile-butadiene-styrene pipe.

5. In response to a request at hearing, the Agency recommends amending Section 211.2200(a) to indicate the pertinent year for the ASTM and to correct the reference to 75 percent, as follows:

Section 211.2200 Extreme High-Gloss Coating

“Extreme high-gloss coating” means:

- a) For purposes of 35 Ill. Adm. Code Section 218.204(q)(1) regarding metal parts and products coatings, a coating which, when tested by ASTM D-523-80, as ~~adopted in 1980,~~ incorporated by reference in Section 211.101 of this Part, shows a reflectance of 75 percent or more on a 600 meter;
- b) For purposes of 35 Ill. Adm. Code Section 218.204(q)(5) regarding pleasure craft coatings, any coating which achieves at least 95 percent reflectance on a 600 meter when tested using ASTM D 523-89, incorporated by reference in Section 211.101 of this Part.

6. In response to a request at hearing, the Agency recommends incorporating the definition of Marine Coating into the definition of Pleasure Craft Surface Coating, as follows:

~~Section 211.3640~~ — Marine Coating

~~“Marine coating” means, for purposes of Section 211.4769, any coating, except unsaturated polyester resin (fiberglass) coatings, containing volatile organic materials and applied by brush, spray, roller, or other means to ships and boats.~~

Section 211.4769 Pleasure Craft Surface Coating

“Pleasure craft surface coating” means, for purposes of 35 Ill. Adm. Code Parts 218 and 219, any ~~marine coating~~, except unsaturated polyester resin (fiberglass) coatings, containing volatile organic materials and applied by brush, spray, roller, or other means to a pleasure craft.

7. On May 7, 2010, Olin Corporation (“Olin”) prefiled testimony with the Board regarding this rulemaking. Based on discussions with a representative of Olin, and on information contained in Olin’s testimony regarding the unique circumstances surrounding coatings/sealants used in ammunition manufacturing, the Agency recommends adding a separate coatings category to Part 218/219.204(q)(1) for Ammunition Sealants. The Agency also recommends adding several definitions to Part 211 to define terms relevant to ammunition sealants, and changing the section number of a definition that is currently part of the Agency’s proposal:

Section 211.481 Ammunition Sealant

“Ammunition sealant” means, for purposes of 35 Ill. Adm. Code Parts 218.204(q)(1) and 219.204(q)(1), a coating applied in the manufacture of ammunition, including cap sealants and mouth waterproofing sealants. Primer sealants and ejection cartridge sealants are not included within this category.

Section 211.880 Cap Sealant

Cap sealant means, for purposes of 35 Ill. Adm. Code Parts 218.204(q)(1) and 219.204(q)(1), a coating applied in the manufacture of ammunition to seal the annular crevice between a primer cap and shellcase.

Section 211.1872 Ejection Cartridge Sealant

Ejection cartridge sealant means, for purposes of 35 Ill. Adm. Code Parts 218.204(q)(1) and 219.204(q)(1), a sealant applied during the assembly of an ejection cartridge to provide a waterproof barrier between a shellcase and primer, and between a shellcase and nitrocellulose wad.

Section 211.39667 Motor Vehicle Weatherstrip Adhesive

“Motor vehicle weatherstrip adhesive” means, for purposes of 35 Ill. Adm. Code Parts 218 and 219, an adhesive, used at a facility that is not an automobile or light-duty truck assembly coating facility, applied to weatherstripping materials for the purpose of bonding the weatherstrip material to the surface of the vehicle.

Section 211.3967 Mouth Waterproofing Sealant

Mouth waterproofing sealant means, for purposes of 35 Ill. Adm. Code Parts 218.204(q)(1) and 219.204(q)(1), a coating applied in the manufacture of ammunition to provide a waterproof barrier between a shellcase mouth and bullet.

Section 211.5075 Primer Sealant

Primer sealant means, for purposes of 35 Ill. Adm. Code Parts 218.204(q)(1) and 219.204(q)(1), a sealant applied in the manufacture of ammunition to assembled primers to maintain the primer assembly and prevent explosive priming mix from dusting during the transfer of primers.

Section 218/219.204 Emission Limitations

- (q) .....
- 1) Metal Parts and Products.....

BB) Ammunition Sealants

i) <u>Air Dried:</u>	<u>0.42</u>	<u>0.80</u>
	<u>(3.5)</u>	<u>(6.67)</u>

ii) <u>Baked:</u>	<u>0.36</u>	<u>0.61</u>
	<u>(3.0)</u>	<u>(5.06)</u>

8. In response to information provided to the Agency by a stakeholder regarding the unique circumstances surrounding electrical switchgear compartment coatings, the Agency recommends adding a separate category to Part 218/219.204(q)(1) for such coatings. The Agency also recommends adding a definition to Part 211 for these coatings, and changing the section numbers of two definitions that are currently part of the Agency's proposal:

Section 211.1876 Electrical Switchgear Compartment Coatings

"Electrical switchgear compartment coatings" means coatings applied to metal-enclosed compartments that house assemblies of medium/high voltage switchgear, of greater than 1,000 volts AC, for utility distribution in outdoor use.

Section 211.1877~~6~~ Electric Dissipating Coating

"Electric dissipating coating" means, for purposes of 35 Ill. Adm. Code 218 and 219, a coating that rapidly dissipates a high-voltage electric charge.

Section 211.1878~~7~~ Electric-Insulating Varnish

"Electric-insulating varnish" means, for purposes of 35 Ill. Adm. Code 218 and 219, a non-convertible coating applied to electric motors, components of electric motors, or power transformers to provide electrical, mechanical, and environmental protection or resistance.

Section 218/219.204 Emission Limitations

- (q) .....
- 1) Metal Parts and Products.....
- .....

CC) Electrical Switchgear Compartment Coatings

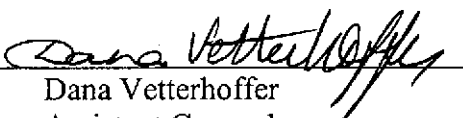
i) <u>Air Dried:</u>	<u>0.42</u>	<u>0.80</u>
	<u>(3.5)</u>	<u>(6.67)</u>
ii) <u>Baked:</u>	<u>0.36</u>	<u>0.61</u>

	(3.0)	(5.06)
<u>DD)BB)</u> All other coatings		
i)    Air Dried:	0.40 (3.3)	.73 (5.98)
ii)   Baked:	0.34 (2.8)	0.54 (4.52)

WHEREFORE, for the reasons set forth above, the Illinois EPA moves that the Board amend Parts 211, 218, and 219 as set forth herein.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By:   
Dana Vetterhoffer  
Assistant Counsel  
Division of Legal Counsel

DATED: May 17, 2010

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**CERTIFICATE OF SERVICE**


I, the undersigned, an attorney, state that I have served electronically the attached POST-HEARING COMMENTS OF THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY and MOTION TO AMEND RULEMAKING PROPOSAL upon the following person:

John Therriault, Assistant Clerk  
Illinois Pollution Control Board  
James R. Thompson Center  
100 West Randolph, Suite 11-500  
Chicago, Illinois 60601-3218

and electronically to the following persons:

**SEE ATTACHED SERVICE LIST.**

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By:   
Dana Vetterhoffer  
Assistant Counsel  
Division of Legal Counsel

DATED: May 17, 2010

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