

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF: )  
 )  
REASONABLY AVAILABLE CONTROL ) R11-23  
TECHNOLOGY (RACT) FOR VOLATILE ) (Rulemaking-Air)  
ORGANIC MATERIAL EMISSIONS FROM )  
GROUP II AND 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 TESTIMONY OF DAVID BLOOMBERG and the TESTIMONY OF YOGINDER MAHAJAN 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: April 14, 2011

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

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**TESTIMONY OF DAVID BLOOMBERG**

My name is David E. Bloomberg. I am employed by the Illinois Environmental Protection Agency (“Illinois EPA” or “Agency”) as the Compliance Unit Manager in the Compliance Section within the Division of Air Pollution Control. I have been at the Agency in this capacity for almost seven years, and was previously an Environmental Protection Engineer in the Air Quality Planning Section for twelve and a half years.

My academic credentials include a Bachelor of Science degree in ceramic engineering from the University of Illinois at Champaign-Urbana, as well as completion of all graduate coursework required for a Master’s degree in the same area of study. I have also completed numerous environmental courses over the years and provided training on air pollution regulations and compliance issues to industry personnel and environmental consultants.

Among my duties, I wrote the technical support document and co-wrote the proposed regulatory language for the original Group II rulemaking (R10-8) covering a portion of the regulations being revised in this current matter, and did likewise for previous rulemakings involving lithographic printing and several coating categories. I further co-wrote the proposed regulatory language for the Group II categories in the current rulemaking as well, and have been

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the Agency's main contact for interpretations and questions involving these rules and other regulations covering printing and coating for over 16 years. In that role and as part of my Compliance Unit Manager responsibilities, I have also participated in both adjusted standard and enforcement hearings involving sources engaged in the printing of flexible packaging. In addition, I have been involved in designing, writing, implementing, and enforcing a wide variety of air pollution regulations, including those for mercury, nitrogen oxides trading, the Clean Air Interstate Rule, and the Emissions Reduction Market System.

My duties as the Compliance Unit Manager involve supervision of the Bureau of Air staff who review documents submitted by sources, such as exceedance, semi-annual, and annual compliance reports, as well as those who review emissions tests, and I approve all such reviews before they are finalized. In addition, I participate in decisions regarding enforcement of the Board's air pollution regulations and oversee the process of sending out Violation Notices and related activities.

I am here today to provide testimony and answer questions pertaining to the modifications to the categories covered by what is known collectively as Consumer and Commercial Products, Group II, which includes lithographic printing, letterpress printing, flexible packaging printing, flat wood paneling coating, and industrial cleaning solvents. A more extensive discussion of these proposed modifications can be found in the Statement of Reasons, but I will summarize briefly again here.

Most of the amendments being proposed by Illinois have been mandated by the United States Environmental Protection Agency ("U.S. EPA") and are necessary in order to obtain U.S. EPA's approval of Illinois' State Implementation Plan ("SIP") submittal. Other changes are

being proposed in order to clarify and simplify some sections of the rules that were found to cause confusion for affected sources.

On July 29, 2010, the Agency submitted the adopted rules to the U.S. EPA for their approval to include them as amendments to Illinois' SIP. After reviewing the rules, the U.S. EPA informed the Agency that the revisions were insufficient and that U.S. EPA would not approve them without amendments. Generally, the U.S. EPA identified the following issues with the rules for which I am testifying: Inadequate recordkeeping requirements for exempt sources, insufficient VOM limitations in certain categories, typographical errors, provisions requiring clarification, failure to include definitions for certain terms, and failure to implement certain recommendations set forth in the CTGs.

The Agency conferred with the U.S. EPA extensively in an effort to resolve these issues. While the U.S. EPA agreed, after Agency explanation, that several of its suggested revisions were not necessary, they also affirmed that the remaining revisions were mandatory in order to obtain SIP approval. The U.S. EPA sent a letter, dated March 9, 2011, to the Chief of the Bureau of Air at the Agency, listing the outstanding deficiencies that must be addressed by the Agency (attached to this testimony as Exhibit A). As such, this proposal addresses these amendments, additional amendments subsequently identified by the U.S. EPA, and amendments identified by the Illinois EPA separately as needing correction.

The Agency agrees with U.S. EPA that all the proposed changes are technically feasible and economically reasonable. Furthermore, as noted earlier, incorporating these additions and modifications to existing Illinois regulations has been required by U.S. EPA, whose staff has indicated such changes need to be made in order to obtain SIP approval.

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**TESTIMONY OF YOGINDER MAHAJAN**

My name is Yoginder Mahajan. I am employed as an Environmental Protection Engineer in the Air Quality Planning Section in the Bureau of Air of the Illinois Environmental Protection Agency (“Agency”). I have been employed in this capacity since March 1992. Prior to my employment with the Agency I worked for various metal fabrication industries for nine years. My educational background includes a Bachelor of Engineering Degree in Mechanical Engineering from Bhopal University at Bhopal, India.

As part of my regular duties in the Air Quality Planning Section, I have been involved with preparing emission estimates for various source categories used in the development of the 1990 ozone season weekday emissions inventories; evaluating control technologies applicable to volatile organic material (“VOM”) emissions sources in preparation of the State Implementation Plans (“SIPs”) for the Chicago and St. Louis ozone nonattainment areas (“NAAs”); and assisting in the development of regulations for the control of VOM emissions from source categories included in the SIP. For the proposal currently before the Board, I was involved in preparing the proposed amendments to correct the deficiencies in the Group IV reasonably available control technology (“RACT”) regulations to satisfy U.S. EPA’s requirements.

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Section 172 of the Clean Air Act (“CAA”) requires that SIPs for nonattainment areas, such as the Chicago and Metro-East St. Louis NAAs in Illinois, must include requirements for RACT as it applies to emissions sources. Section 182(b)(2)(A) of the CAA further requires that SIPs be revised to include RACT for VOM emissions sources that are covered by a Control Techniques Guideline (“CTG”) document issued by U.S. EPA after November 15, 1990, and before the area’s date of attainment. The U.S. EPA defines RACT as “the lowest emission limitation that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility.”

On October 7, 2008, the U.S. EPA issued the final CTGs for Consumer and Commercial Products, Group IV. In response to the Group IV CTGs, the Agency proposed amendments to 35 Ill. Adm. Code Parts 211, 218 and 219 (in rulemaking R10-20). On September 2, 2010, the Illinois Pollution Control Board (“Board”) adopted these amendments.

On July 29, 2010, the Agency submitted the adopted rules to the U.S. EPA for their approval to include them as amendments to Illinois’ SIP. After reviewing the rules, the U.S. EPA informed the Agency that the revisions were insufficient and that U.S. EPA would not approve them without additional amendments. Generally, the U.S. EPA identified the following issues with the rules: inadequate recordkeeping requirements for several product categories, insufficient VOM limitations, typographical errors, provisions requiring clarification, and failure to implement certain recommendations set forth in the CTGs. The Agency conferred with the U.S. EPA extensively in an effort to resolve these issues. The U.S. EPA agreed that several of its suggested revisions were not necessary and affirmed that the remaining revisions were mandatory in order to obtain SIP approval. The U.S. EPA sent a letter, dated March 9, 2011, to the Agency’s Chief, Bureau of Air, listing the outstanding deficiencies that must be addressed by

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the Agency (attached to this testimony as Exhibit A). The proposal before the Board implements these amendments, as well as additional amendments subsequently identified by the USEPA, proposes additional typographical corrections and clarifications, and amends certain provisions.

The Agency believes that these amendments are technically feasible and economically reasonable, and that this proposal will not adversely impact the affected sources in Illinois.

Adoption of these amendments by the Board is necessary in order to obtain the U.S. EPA's approval of Illinois' SIP.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

MAR 09 2011

REPLY TO THE ATTENTION OF:

AR-18J

Laurel L. Kroack  
Chief  
Bureau of Air  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276

RECEIVED  
STATE OF ILLINOIS

MAR 15 2011

Environmental Protection Agency  
BUREAU OF AIR

Dear Ms. Kroack:

The Clean Air Act requires areas like the Chicago-Gary-Lake County, IL-IN area (Chicago area) and St. Louis, MO-IL area (St. Louis area), that have been designated as nonattainment for the 1997 8-hour ozone standard and classified as moderate, to adopt Reasonably Available Control Technology (RACT) measures for sources of Volatile Organic Compounds (VOC). Before the Illinois portions of the Chicago and St. Louis nonattainment areas can be redesignated for the 1997 8-hour ozone standard, the VOC RACT requirements must be fulfilled.

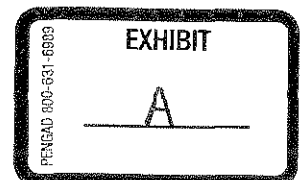
There are currently outstanding deficiencies with the VOC RACT rules that have been submitted to the U.S. Environmental Protection Agency on July 29, 2010. While both the Illinois Environmental Protection Agency and Region 5 staff have been discussing these deficiencies, we would once again stress the fact that the deficiencies that have been identified must be addressed, submitted and federally approved before the Illinois portions of the Chicago and St. Louis areas can be redesignated for the 1997 8-hour ozone standard. We have attached the list of deficiencies that have been identified. Please note that these comments have been written with respect to the VOC RACT rules for the Chicago area. It is our understanding that the VOC RACT rules for the St. Louis area are identical to the rules for the Chicago area. Consequently, the same comments apply to the St. Louis rules.

If you have any questions regarding this issue, please feel free to call me or Steve Rosenthal, of my staff, at (312) 886-6052.

Sincerely,

Cheryl L. Newton  
Director  
Air and Radiation Division

Attachment





**Required Corrections to Volatile Organic Compound Reasonably Available Control Technology (RACT) Rules Submitted to U.S. EPA on July 29, 2010 by Illinois EPA**

**Group II**

**218.187 Other Industrial Solvent Cleaning Operations:**

218.187(a)(1) – As an alternative to the 15 lbs/day cutoff, 500 lb/month is an acceptable applicability cutoff provided that monthly recordkeeping requirements for exempt sources are included. See comment for 281(e)(1)(A). Solvents from cleaning operations exempt from this rule need not be included when determining if the 500 lb/month applicability cutoff has been exceeded,

218.187(a)(2)(A)(iii) – Please delete this exemption for screen reclamation activities. The exemptions in (a) were generally based on South Coast Rule 1171, which does not include screen reclamation activities as an exemption. The screen printing emission limit is sufficiently high to accommodate screen reclamation activities.

218.187 (a)(2)(B)(i) and (x) - Either remove the exemptions for aerospace coating and shipbuilding and repair coating operations or provide adequate negative declarations for these source categories.

218.187(a)(2)C(v) and (xiii) - Daily records are required to establish whether the 1.5 gallons/day applicability cutoffs are exceeded.

218.187(b) – For sources that manufacture coatings, inks, adhesives, or resins, alternative methods of compliance are acceptable. For all sources of this type, when using cleaning solvent for wipe cleaning, sources must cover open containers used for the storage of spent or fresh organic compounds used for cleanup or coating, ink, adhesive, or resin removal and cover open containers used for the storage or disposal of cloth or paper impregnated with organic compounds that are used for cleanup or coating, ink, adhesive, or resin removal. In addition, this type of source would also be required to choose from one of the following methods of compliance:

- 1) A limit of 1.67 lb/gal for the cleaning of ink application equipment used in the manufacturing of coatings, inks, adhesives, or resins;
- 2) The composite vapor pressure of each as-used cleaning solution used does not exceed 8.0 mmHg measured at 20° C;
- 3) Installation and operation of an afterburner or carbon adsorber that reduces VOM emissions by at least 80 percent overall and has a 90 percent efficiency;
- 4) Compliance with the following work practices: a) equipment being cleaned is maintained leak-free; b) VOM-containing cleaning materials are drained from the cleaned equipment upon completion of cleaning; c) VOM-containing cleaning materials, including waste solvent, are not stored or disposed of in such a manner that

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will cause or allow evaporation into the atmosphere; and d) VOM-containing cleaning materials are stored in closed containers; and,

- 5) Use solvents that do not comply with options 1) or 2), above, provided that all of the following requirements are met: a) No more than 60 gallons of fresh solvent is used per calendar month (solvent that is reused or recycled for further use in equipment cleaning or in the manufacture of coatings, inks, adhesives, or resins would not be included in this limit); b) Solvents, including cleanup solvents are collected and stored in closed containers; and, d) records are kept of the name, identification and volume of each cleaning solution as applied in each cleaning operation; the volume of each fresh cleaning solvent used for cleaning coating, ink, adhesive, or resin manufacturing equipment; and the volume of cleaning solvent recovered for either offsite or onsite reuse or recycling for further use in the cleaning of coating, ink, adhesive, or resin manufacturing equipment.

218.187 (e)(1)(A) - There is inadequate recordkeeping for exempt sources. Specific recordkeeping requirements must be listed. For example, if the 500 lbs/month cutoff is used, at a minimum, records would include the following information for each month for each cleaning operation: the name and identification of each cleaning solution as applied in each cleaning operation; the VOM content of each cleaning solution as applied in each cleaning operation; the mass of VOM per volume of each cleaning solution used, as applied; and the total monthly VOM emissions from cleaning operations at the facility.

218.187 (g)(2)(B) - It must be made clear that in the event of any inconsistency between a Method 24 test and the manufacturer's specifications, the Method 24 test takes precedence.

### **218.204 Flat Wood Paneling (and associated sections)**

211 Definitions - There are no definitions of hardwood plywood, natural finish hardwood plywood panel, panel, printed interior panel, thin particleboard, and tileboard. These definitions are contained in model VOC rules and should be included.

211.2355 "Flat Wood Paneling" definition - Delete the comma between hardwood and plywood at the end of the definition.

218.105(e)(2) - This section needs to be revised to include a reference to 218.207(m) for 218.105(e)(2) to apply.

218.207(b)(2)(B) - It needs to be made clear that "S" is equal to the limit in 218.204(p)(2), and not calculated according to section 218.206, as required by 218.207(b)(2)(B).

218.207(b)(2)(C) - The last sentence in this subsection should be changed from, "If the coating line is complying with..." to, "If the coating line is subject to...."

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218.211(c)(1)(F), (c)(2)(G), (d)(1)(H), and (d)(2)(G) – It should be made clear that records must be kept “for each coating.”

218.217(d) - Add "Convey any coatings, thinners, and cleaning materials in closed containers or pipes" to the list of work practice standards.

**218.401 Flexible Packaging (and associated sections)**

218.401(b)(3)(A) and (B) – The terms  $W_i$  in (A) and  $L_i$  in (B) should be in units of kg (lb).

218.402(a)(2) - Applicability is based on 25 tons/year potential to emit (which considers the effect of controls). However, CTG applicability for each line is based on 25 tons/year emissions before controls, which is more stringent. This section seems to apply to 25 tons/year potential to emit combined emissions from all lines (however this is not explicit). The 25 tons/year potential to emit applicability would be acceptable if the state makes it explicit in the rule that this is combined emissions from all lines.

218.404(b)(1)(B) – Calculations are required which demonstrate that the combined potential to emit of all flexographic and rotogravure printing lines at the source never equals or exceeds 25 tons of VOM per year.

218.404(b)(2) – The new compliance date needs to be made clear for flexographic or rotogravure printing lines that print flexible packaging or that print flexible packaging and non-flexible packaging on the same line.

218.404(b)(3) – Exempt sources should also be required to notify the Agency of any record showing that the combined potential to emit of all flexographic and rotogravure printing lines at the source equals or exceeds 25 tons of VOM in any calendar year.

218.404(d)(1)(D) - This subsection should also include the method to calculate the weight of each coating or ink.

218.404(d)(2)(B) - This subsection should also require records be kept of the weight of each coating or ink.

218.404(f)(1)(B) - The records to document that emissions never equal or exceed 15 lbs VOC/day must be specified so that there is no ambiguity as to their adequacy. At a minimum, these would include the following information each day for each subject printing line: the name and identification number of each coating, ink and cleaning solvent as applied each day on each printing line; the VOM content of each coating and ink (measured in weight of VOM per volume of coating or ink, or in weight of VOM per weight of coating or ink) as applied each day on each printing line, and the volume or weight of each coating or ink as applicable; the weight of VOM per volume of each cleaning solvent and the volume of each cleaning solvent used each day on each printing line; and the total daily emissions of VOM from each flexographic and rotogravure

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printing line (including solvents used for cleanup operations associated with such lines) and the sum of daily emissions from all such lines.

### **218.405 Lithographic Printing (and associated sections)**

218.409(a) - Testing should be required a specified time after compliance is required, e.g. 3-6 months.

218.411(b)(1) (F) – This section should be revised to include the specific records required to determine whether the 46 gallons/month and 450 pounds/month are exceeded. At a minimum, these records must include: the name, identification number, and VOM content of each cleaning solvent and fountain solution additive used per calendar month, the volume of each cleaning solvent and fountain solution additive used per calendar month for each sheetfed and nonheatset web offset lithographic printing operation, and the weight of each ink, cleaning solvent and fountain solution additive used per calendar month for each heatset web offset lithographic printing operation.

218.411(g)(2)(A)(ii) – More specific recordkeeping requirements are needed. Revise language to read, “The name, identification, and volume of all cleaning materials used per calendar month on lithographic printing lines at the source that do not comply....”

### **218.412 Letterpress Printing Lines (and associated sections)**

218.415(a) - Testing should be required a specified time after compliance is required, e.g. 3-6 months.

218.417(b)(3)(A) - This section should be revised to include the specific records required to determine whether the 46 gallons/month and 450 pounds/month are exceeded. At a minimum, these records must include: the name, identification number, and VOM content of each cleaning solvent and ink used per calendar month, the volume of each cleaning solvent used per calendar month for each sheetfed and nonheatset web letterpress printing operation, and the weight of each cleaning solvent and ink used per calendar month for each heatset web letterpress printing operation.

218.417(c) - The introductory language should be revised to more clearly state that the recordkeeping requirements in (c)(1) or (c)(2) must apply to any source claiming to be exempt from and below the applicability cutoffs in 218.412(a)(1) and/or (a)(2).

### **Group IV**

#### **218.204(a) Automobile or Light Duty Truck Coating**

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218.204(a)(2)(E)(ii) – This subsection should be revised to define “occurrence” as the application of the combination of coatings that constitute a final repair coat for a single automobile or light-duty truck. It should be made clear that Section 281.205 does not apply.

### **218.204(q) Miscellaneous Metal and Plastic Parts and Products**

218.204(q)(1)(A)(iii) - There is no apparent basis for a clear coating limit of 4.3 lbs/gal. This limit should be deleted.

218.204(q)(1)(H) – The 0.66 kg/l limit for heat-resistant coatings should be removed.

218.204(q)(1)(I) - This category was previously subject to the 3.5 lbs/gal general limit and going from 3.5 to 6.2 is a relaxation. This limit should be 3.5 lbs/gal.

218.204(q)(1)(Z) - This 4.3 lbs/gal limit should be deleted in favor of the 4.2 lbs/gal CTG limit in 218.204(q)(1)(Y).

218.204(q)(1)(AA) – There is no apparent basis for special limits for marine engine coatings. The extreme performance coatings category is sufficient to address marine engine coatings. This subsection should be deleted.

218.204(q)(3)(E) – There is no apparent basis for the relaxed specialty coating limit for texture basecoats under subsection (i); gloss reducers and texture topcoats under (iii), and the limits under subsections (ii), (iv), and (v). These relaxed limits should be deleted.

218.204(q)(3)(F) - The 1.15 factor should be multiplied by the limits in (q)(3)(A) through (q)(3)(C) not (q)(3)(E).

218.204(q)(4)(A) – It is acceptable to set a limit of 2.9 lbs/gal for primers.

218.204(q)(4)(I) - There is no apparent basis for the relaxed specialty coating limits. This subsection should be removed.

218.207(b)(2)(C) - The last sentence in this subsection should be changed from, “If the coating line is complying with...” to, “If the coating line is subject to....”

### **218.211 Recordkeeping and Reporting**

218.211(c)(1)(H) – This subsection should be revised to read as follows, “For coatings subject to the limitations of Section 218.204(a)(2)(E), the weight of VOM per volume and volume of each coating used in the final repair coat operation, and the weight of VOM per volume of the final repair coat as applied, calculated on an occurrence weighted average basis.”

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218.211(c)(2)(I) – This subsection should be revised to read as follows, “For coatings subject to the limitations of Section 218.204(a)(2)(E), the weight of VOM per volume and volume of each coating used in the final repair coat operation, the weight of VOM per volume of the final repair coat as applied, calculated on an occurrence weighted average basis, and certified product data sheets for each coating.”

218.211(f)(2) – This section should reference the revised auto protocol.

218.211(j) - The pleasure craft recordkeeping should reference 218.207 (o), not (m).

218.211(j)(2)(A) - The records should include the coating category for each coating.

### **218.900 Miscellaneous Industrial Adhesives**

218.901(b) - The emission limits should be in units of mass of VOM per volume of adhesive or adhesive primer, excluding water and exempt compounds, as applied.

218.901(c)(1) and (c)(2) –  $M_i$  should be  $V_i$ , the volume (gallons) of each adhesive, as applied.

218.901(c)(2) –  $Limit_{WA}$  should be the allowable weighted average rather than the mass weighted average.

218.901(d)(2) & (3) - The alternatives specified in (d)(2) and (d)(3) are not precisely defined and should therefore be submitted to and approved by EPA as a SIP revision.

218.902(a) – Testing should be required within a specific time interval after compliance is required, e.g. 3-6 months.

218.903 - The requirement for a CEM must be added when a carbon adsorber is used to demonstrate compliance. Listing temperature monitoring devices alone erroneously implies that temperature monitoring is appropriate for a carbon adsorber and/or that a CEM is not needed for a carbon adsorber.

218.904(d)(2) - Daily records must be kept of the volume of each adhesive as applied each day by each subject adhesive application operation.

### **Section 218.890 Fiberglass Boat manufacturing**

218.891(a) – The equation for “Weighted Average Monomer VOM Content” should be deleted. The subsection should also be revised to read as follows, beginning with the last sentence under (a): “The excess non-monomer VOM shall be calculated in accordance with the equation below:

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Excess Non-Monomer VOM = Non-monomer VOM content – 5 percent, by weight

- 218.891(c)(2) – It should be made clear that the monomer VOM emissions calculated using Equation 3 may not exceed the monomer VOM limit calculated using Equation 2.
- 218.891(c)(4) – Language should be added to clarify that the formulas calculate monomer VOM emission rates in terms of kg of monomer VOM per Mg of resin or gel coat applied. Also, VOM percent should be defined as the monomer VOM content as supplied, expressed as a weight percent value between 0 and 100 percent.
- 218.891(d)(1) – An alternative plan must be submitted to EPA as a SIP revision.
- 218.891(e) – After the sentence beginning, “If complying pursuant to subsection (b)...,” the following sentence should be added, “If complying pursuant to subsection (c), the value of  $PV_F$  calculated using Equation 5, shall be used for the value of  $PV_i$  in Equation 4, as set forth in subsection (c)(3) of this Section.”
- 218.891(e)(3) – The term  $PV_U$  should be defined as “The monomer VOM emission rate for the unfilled resin, before filler is added, expressed in kg monomer VOM per Mg, as calculated using the formulas in Section 218.891(c)(4) of this Subpart.
- 218.892(a) - Testing should be required within a specific time interval after compliance is required, e.g. 3-6 months.
- 218.892(c)(5) - The requirement for a CEM must be added when a carbon adsorber is used to demonstrate compliance. Listing temperature monitoring devices alone erroneously implies that temperature monitoring is appropriate for a carbon adsorber and/or that a CEM is not needed for a carbon adsorber.
- 218.894(a) - To be enforceable, the following monthly records should be kept: (i) total pounds of all resins and gel coats used per calendar month; (ii) total gallons of all cleanup materials used per calendar month; (iii) VOM content of each resin, gel coat, and cleanup material used per calendar month; and (iv) total VOM emissions, in pounds, for all resins, gel coats, and cleanup material employed per calendar month, before the application of control systems and devices.
- 218.894(c)(2)(B) - Monthly records of the mass of each open molding resin or gel coat, as applied, are required to establish the weighted average (not daily weighted average) VOM content.
- 218.894(g)(3)(D) – Language should be revised for clarification to read, “The total amount of each cleaning solvent, including water, used to prepare the as-used cleaning solution....”

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CERTIFICATE OF SERVICE


I, the undersigned, an attorney, state that I have served electronically the attached TESTIMONY OF DAVID BLOOMBERG and TESTIMONY OF YOGINDER MAHAJAN 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: April 14, 2011

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