



American Coatings ASSOCIATIONSM

March 28, 2019

RE: Regulation for Criteria Pollutant and Toxic Air Contaminant Emissions Reporting under AB 617; ACA Comments

To whom it concerns:

The American Coatings Association (ACA)¹ submits the following comments on the Regulation for Criteria Pollutant and Toxic Air Contaminant Emissions Reporting under AB 617.

ACA is concerned with increased recordkeeping and reporting burden on surface coating operations (including but not limited to autorefinit, metal parts, plastic parts, and marinas). This regulation will result in increased burden on ACA members (coatings manufacturers) since they will need to help to their customers (surface coating operations) comply with increased emission reporting requirements.

Coatings manufacturers and surface coating operations already provide a significant amount of emissions information via local, state and Federal VOC and HAP regulations. These regulations already require coatings manufacturers to provide information to surface coating operations (via product labels, MSDS, product data sheets, etc.). Many surface coating operations are subject to operating air permit recordkeeping and recordkeeping requirements. Further, these operations are also subject to additional local, state and Federal VOC and HAP rules that require surface coating operations to record and report coating and solvent usage. ACA suggests utilizing existing reporting information before requiring additional requirements. In addition, many local air districts exclude smaller operations from permitting requirements. We respectfully suggest, to reduce burden, CARB consider excluding from this proposed regulation those facilities and/or categories of equipment which air districts, have from being permitted.

ACA also suggests CARB supplementing their modelling estimates with real world monitoring.

Thank you for your consideration of our concerns. Please do not hesitate to contact us if you have any questions.

Sincerely,

/s/

David Darling
Vice President, Health, Safety and Environmental Affairs

¹ The American Coatings Association (ACA) is a voluntary, nonprofit trade association working to advance the needs of the paint and coatings industry and the professionals who work in it. The organization represents paint and coatings manufacturers, raw materials suppliers, distributors, and technical professionals. ACA serves as an advocate and ally for members on legislative, regulatory, and judicial issues, and provides forums for the advancement and promotion of the industry through educational and professional development services.