



AmericanCoatings
ASSOCIATIONSM

March 6, 2020

David Edwards
Branch Chief
Greenhouse Gas and Toxic Emission Inventory Branch California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Proposed Amendments to the Regulation for the Reporting of Criteria Pollutants and Toxic Air Contaminants

The American Coatings Association (ACA)¹ appreciates the opportunity to comment on the proposed amendments to the Reporting of Criteria Pollutants and Toxic Air Contaminants regulations. In comments submitted in March of 2019, ACA raised concerns with the increased recordkeeping and reporting burden on surface coating operations (including but not limited to autorefinitsh, metal parts, plastic parts, and marinas). This regulation increased requirements on ACA members (coatings manufacturers) since they will need to help their customers (surface coating operations) comply with increased emission reporting requirements.

Related to the proposed amendments to be adopted in 2020, ACA is concerned with confusion that could result with Parachlorobenzotrifluoride (PCBTF) included in Phase 1 rather than in Phase 2. As noted, the Phase 1 reporting for Isocyanates and Tert-butyl from auto body repair and coating operations are reported under the Phase 2 category for that process. Isocyanates from auto body repair and coating operations are also reported under the Phase 2 category for that process. However, PCBTF is listed under Phase 1.

ACA believes this will cause confusion for coatings manufacturers, as well as many other impacted companies, that will be required to report under the regulations. While ACA was not able to participate in the workshops hosted in February, ACA hopes this issue can be addressed and are happy to work with staff on this. Thank you for your consideration and please do not hesitate to contact us if you have any questions.

Sincerely,

David Darling

David Darling, P.E.
VP, Health, Safety and Environmental Affairs
American Coatings Association
901 New York Ave., NW Suite 300 West
Washington, DC 20001
202-719-3689

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.