



May 21, 2020

To whom it may concern:

Thank you for the opportunity to provide additional comments and feedback regarding the proposed changes to AB 2588 Air Toxics "Hot Spots" Inventory Guidelines as presented on April 30, 2020. The comments offered today focus on the additions to Appendix E, Proposed Requirements for Smaller Facilities.

As background, PRINTING United Alliance represents the printing industry, as defined by the North American Standard Industrial Code 323xxx, including but not limited to commercial printing, screen printing and digital printing operations. According to the latest version of the Print Market Atlas, there are approximately 4,700 printing operations in the state of California. Over 80% of the establishments in the state employ 20 employees or less. Printing is a prime example of small business involved in manufacturing. In reviewing Appendix E, several sectors included the printing industry, however printing should not be included in the following identified sectors.

Our comments are as follows:

Sector 7, Processes emitting 1,4-dioxane lists commercial printing as an identified sector. Based on the most recent US EPA TRI data, the printing industry does not release this chemical. Therefore, please remove the printing industry from this specific sector.

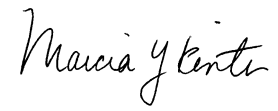
Sector 9, the use of styrene by identified industry sectors contains a discrepancy in the crosswalk between the identified SIC codes and NAICS codes. The listing of industry sectors in the NAICS code incorrectly lists 32311, Printing. Printing does not emit styrene. The listings identified for the SIC codes are correct, as printing is not included.

Sector 12 contains references to those industry sectors releasing/using isocyanates including the printing industry. Based on the most recent data in the US EPA's TRI database, the printing industry does not release this chemical. We recommend that the printing industry both under the SIC code listing of 27xx and 32311x be removed from this sector.

Sector 15 contains specific references to the printing industry. Based on our aforementioned comment regarding use and release of isocyanates, we recommend that the reference to "Use of graphic arts materials with isocyanates: Annual average of 0.5 gallons per day" be removed.

Thank you for the opportunity to submit comments on this important rulemaking. Please do not hesitate to contact me if you have additional questions or require additional information.

Sincerely,

A handwritten signature in black ink that reads "Marcia Y. Kinter". The signature is written in a cursive, flowing style.

Marcia Y. Kinter
Vice President – Government Affairs