



# AmericanCoatings

ASSOCIATION<sup>SM</sup>

May 21, 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)<sup>1</sup> 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 and 2020, ACA raised concerns with the increased recordkeeping and reporting burden on surface coating operations (including but not limited to autorefinit, 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. ACA also supports the comments submitted by the American Chemistry Council (ACC).

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 in the regulation, the Phase 1 reporting for Isocyanates and Tert-butyl Acetate 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 a common chemical used in auto refinish operations is also included under Phase 1 and is to be reported under Phase 1 (5 lbs. threshold), and does not have any comment with regard to auto body repair and coating operations.

To simplify reporting and minimize confusion for autorefinit operations, ACA suggests that PCBTF be included in Phase 2 along with Isocyanates and Tert-butyl Acetate, and not subject autorefinit operations to both Phase 1 and Phase 2 reporting.

In addition, it would be helpful to define what is meant by Isocyanate compound? Isocyanate oligomer, monomer, HDI, TDI? ACA suggests CARB including the Chemical Abstracts Service (CAS) number to minimize confusion.

Finally, ACA suggests that industry needs considerable time to review the list of 800+ new substances, determine whether these compounds are used in California, and whether the compound is used above the thresholds. Please note that these tasks will be much more difficult since CARB has not provided CAS numbers for each of the added compounds. ACA suggests CARB provide sufficient time to complete these tasks.

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<sup>1</sup> 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.

Thank you for your consideration and please do not hesitate to contact us if you have any questions.

Sincerely,

*David Darling*

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