

**Comment 1 for Architectural Coating Suggested Control Measure 2019  
(archcoatingscm2019) - Non-Reg.**

First Name: Stan

Last Name: Cowen

Email Address: 9cloud9@roadrunner.com

Affiliation: Ventura County APCD

Subject: SCM Much Less Stringent than SCAQMD Rule 1113

Comment:

We are very disappointed that ARB staff are proposing VOC limits that are less stringent than SCAQMD Rule 1113, Architectural Coatings. The South Coast VOC limits have been successfully implemented since 2013 when averaging provisions sunset. Arguments from industry that climate conditions in the South Coast do not apply statewide are rebutted by the fact that quick-drying coatings are available in low-VOC formulations. Arguments that coating formulations require the use of air toxic solvents are wrong because low-VOC coatings are available using non-toxic formulations. For example, industrial maintenance coatings using sprayable polyurea coatings are quick-drying, zero VOC and zero toxic air pollutants and have been available for a long time. As a nonattainment area for ozone, state law requires that we adopt All Feasible Measures. SCAQMD Rule 1113 has been demonstrated to be an All Feasible Measure. Adoption of this SCM will hinder our efforts to adopt the VOC limits currently effective in the South Coast.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2019-05-17 07:38:09

No Duplicates.

**Comment 2 for Architectural Coating Suggested Control Measure 2019  
(archcoatingscm2019) - Non-Reg.**

First Name: Bob

Last Name: Lukefahr

Email Address: bob.lukefahr@pellucere.com

Affiliation: Pellucere Technologies, Inc.

Subject: Comments from Pellucere regarding CARB ACS Control Measure Item

Comment:

See attached comments.

Attachment: 'www.arb.ca.gov/lists/com-attach/2-archcoatingscm2019-  
USFUN1E8BTpSIQNg.pdf'

Original File Name: Pellucere CARB Letter 5.20.19 Final.pdf

Date and Time Comment Was Submitted: 2019-05-20 11:07:12

No Duplicates.

**There are no comments posted to Architectural Coating Suggested Control Measure 2019 (archcoatingscm2019) that were presented during the Board Hearing at this time.**