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October 25, 2007

Ms. Mary Nichols
Air Resources Board Members
Air Resources Board
1001 I Street
Sacramento, California 95814

Re: Proposed Amendments to the Suggested Control Measure for Architectural Coatings

Ms. Nichols and Air Resources Board Members:

Tnemec Company is a manufacturer of architectural and industrial maintenance coatings. We recognize the need for environmental stewardship and VOC reductions in California. We support VOC limits for architectural and industrial maintenance coatings based on technically feasible field-proven coatings technology. We appreciate the opportunity to provide comments on the proposed Suggested Control Measure for Architectural coatings.

Industrial Maintenance Coatings

A large percentage of Tnemec Company's business is in the manufacture and sales of coatings that fall into the industrial maintenance coatings category. The industrial maintenance category is very important for protection of infrastructure, which could be considered a component of national security.

Tnemec is continuing to work on development of 100 g/L products that will overcome various technical limitations, which include climate/temperature, application, and performance. A large percentage of our development efforts are focused on bringing 100 g/L products to market. We believe that industry is making good strides to bring these new 100 g/L products to market and Tnemec has a few 100 g/L products being used in SCAQMD. There is still a lack of experience and comfort with using these products outside the SCAQMD.

It Is our opinion that in three or four years, we may be in a position to support a 100 g/L VOC limit for all of California, but at this time a 250 g/L limit is appropriate. Given these details, we support the staff's recommendation of a 250 g/L limit for the Industrial Maintenance coatings category.

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Zinc-Rich Industrial Maintenance

Tnemec supports the staff's recommendation of this new coatings category definition with a limit of 340 g/L. Zinc-rich coatings have been proven to provide long-term corrosion protection of steel substrates. The use of zinc-rich coatings results in much lower VOC emission over the life of the structure due to the reduction in the frequency of having to completely blast and repaint a given steel structure. We agree that this category is needed to lower the VOC limit for these coatings that were previously classified under the Metallic pigmented coatings category with a VOC limit of 500 g/L.

TBAc Exemption

Tnemec disagrees with the public comments made indicating the exemption of TBAc as a VOC would allow the Industrial Maintenance coatings category limit to be reduced to 100 g/L. While TBAc does offer some flexibility for the coatings formulator, it is not the simple solution for reduction of VOCs in all industrial maintenance coating formulations; it has a number of limitations with regards to solubility and compatibility with certain polymers used to manufacture coatings. As an example, epoxy resins have limited solubility in TBAc and TBAc has been shown to cause surface defects like microfoam in two-component urethane products. These surface defects make the final film unacceptable for performance and also aesthetic reasons. These two chemistries are fundamental for industrial maintenance coatings and cannot be replaced by thermoplastic latex coatings. TBAc has a very fast evaporation rate, which limits its ability to provide the flow, leveling, and solvency characteristics required to provide an acceptable smooth, aesthetically-pleasing finish for a number of architectural and industrial coatings.

Tnemec does, however, support the exemption of TBAc as a VOC to allow industry the ability to have another formulating tool for creating lower VOC products. Currently, the only exempt solvent choices are PCBTF, acetone, and methyl acetate. In addition to limitations of solvency power and evaporation rate, the hydrophobicity of some of these solvents limits their use in Industrial Maintenance coatings

The fact that 48 other states have exempted TBAc as a VOC creates an additional regulatory burden for the coatings manufacturers to provide VOC measurements in different formats for two states; and, in limited cases, restricting the use of these products for use only in the SCAQMD and the other 48 states that have exempted TBAC. This also creates confusion among end users who are trying to understand and comply with an already complex regulation.

Tnemec would like to express recognition of the staff for their good work on the SCM revision process. We believe the staff did a good job of listening to stakeholders and has developed an SCM with reasonable limits based on the current state of coatings technology.

Sincerely,

TNEMEC CO., INC.

Kyle R. Frakes
R&D Coordinator

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