American Chemistry Council

SHARON H. KNEISS
VICE PRESIDENT
PRODUCTS DIVISIONS

October 19, 2007

Lori Andreoni
Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814-2828

RE: Suggested Control Measure for Architectural and Industrial Maintenance Coatings

Dear Board Members:

The American Chemistry Council's Solvents Industry Group (ACC SIG)[1] is pleased to submit the following comments to the California Air Resources Board (ARB) concerning the proposed revisions to the Suggested Control Measure (SCM) for Architectural and Industrial Maintenance (AIM) coatings.

For the reasons presented in these comments and in SIG's previous submissions (see Attachments A - F), SIG urges the ARB to include reactivity in the SCM for AIM coatings. Prior ARB statements clearly acknowledge that reactivity-based approaches should provide equal or greater environmental benefits, and we believe there is no longer any supportable scientific, policy or legal reason not to realize those benefits.

As set forth in the attached comments, recent ARB data demonstrate clearly that as tighter mass-based limits are imposed, there is a greater risk that the projected benefits will be reduced or *negated entirely* by changes in formulations toward use of more photochemically reactive solvents. Rather than ignore this quantitative ARB data, we believe ARB should recognize it, and adopt an approach that incorporates reactivity and thereby prevents unintended back-sliding from occurring.

SIG members manufacture hydrocarbon and oxygenated organic solvents covering a wide range of photochemical reactivity, including solvents used in water-based coatings. SIG supports the development of regulations that will encourage product formulators to consider reactivity in their formulating decisions, as a way to reduce the environmental impact of solvents without compromising product performance, including avoiding performance decrements that would lead to more frequent use and ultimately

[1] The following companies are members of the ACC Solvents Industry Group: The Dow Chemical Company; ExxonMobil Chemical Company; Shell Chemical LP; Eastman Chemical Company; and Sasol North America, Incorporated.

greater emissions. Photochemical reactivity applies equally to water-based technologies, which, because of their large volumes, can have significant contributions to ozone formation. SIG has participated in the ARB's Reactivity Research Advisory Committee (RRAC), and has supported relevant research, including ARB's research on the photochemical reactivity of solvents used in architectural coatings, and research coordinated by EPA's Reactivity Research Work Group (RRWG).

We appreciate your consideration of these comments. If you have any questions, or if we can provide additional support for the incorporation of reactivity into the SCM for AIM coatings, please contact the SIG's manager, Andrew Jaques, at (703) 741-5627 or by email at Andrew_Jaques@americanchemistry.com.

Sincerely,

Andrew Jaques for

Sharon H. Kneiss
Vice President, Products Divisions

Attachments:

A. February 21, 2007 Presentation to ARB Staff
B. June 6, 2007 Presentation at AIM Coating Workshop
C. July 25, 2007 Presentation to ARB Staff
D. May 10, 2007 Letter to J. Nyarady, ARB
E. June 20, 2007 Letter to J. Nyarady, ARB
F. September 25, 2007 Presentation at SCAQMD Technology Forum

cc: Robert Fletcher, Division Chief
ARB Stationary Source Division

Barbara Fry, Chief
ARB Measures Assessment Branch

James Nyarady, Manager
ARB Strategy Evaluation Section

Mary Nichols, Executive Officer
ARB