



October 23, 2007

Clerk of the Board
California Air Resources Board (CARB)
1001 I Street
Sacramento, CA 95814

RE: Proposed Amendments to the Suggested Control Measure for Architectural Coatings; NPCA Comments

Dear Board Members,

The National Paint and Coatings Association (NPCA)¹ submits the following comments on the proposed amendments to the Suggested Control Measure (SCM) for Architectural and Industrial Maintenance (AIM) Coatings.

NPCA supports CARB's determination that technology issues with regard to low VOC coatings still remain, including adhesion problems; freezing during transportation and storage of products; problems with scrub, dirt pickup, and mildew/fungus resistance; and stain blocking, as well as the fact that coatings need to be available for California's wide variety of climates.

It is important to note that the SCM achieves nearly a 30% overall emission reduction, and a 37% reduction from the specific categories with newly lowered limits.

NPCA supports Staff extending the effective limit for Specialty Primers until 2012 to allow manufacturers to develop appropriate stain-blocking test methods since the industry believes that a subset of the Specialty Primer category must remain at the current VOC limit. The stain-blocking test methods will be useful in determining which portion of the category can be lowered to 100 g/l. In order to facilitate the future change to this category, NPCA respectfully asks the Board to direct staff to complete a Specialty Primer technology review by December 2010 to address any needed changes to the Specialty Primer category definition and limit.

¹ NPCA is a voluntary, nonprofit trade association representing some 350 manufacturers of paints, coatings, adhesives, sealants, and caulks, raw materials suppliers to the industry, and product distributors. As the preeminent organization representing the coatings industry in the United States, NPCA's primary role is to serve as ally and advocate on legislative, regulatory and judicial issues at the federal, state, and local levels. In addition, NPCA provides members with such services as research and technical information, statistical management information, legal guidance, and community service project support.



NPCA supports CARB continued work on a Reactivity and Atmospheric Availability approaches for Architectural and Industrial Maintenance Coatings. In the meantime, NPCA respectfully asks the Board to direct staff to work with Industry over the next year to develop a Low-Reactivity Innovative Products Exemption (IPE) for adoption in the SCM. The IPE would allow specific coating products or product categories to be evaluated based on reactivity on a case-by-case basis by showing equivalent ozone reductions. The IPE concept is a good compromise between proposing a full AIM Reactivity approach and proposing no AIM Reactivity approach at all, since it would provide a mechanism for further work on the AIM reactivity approach.

Thank you for your consideration of our comments. Please do not hesitate to contact us if you have any questions or need additional information.

Sincerely,

/s/

David F. Darling, P.E.,
Director, Environmental Affairs

/s/

Alison Keane
Counsel, Government Affairs