

October 24, 2007

Clerk of the Board
Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Amendments to the Suggested Control Measure for Architectural Coatings

Dear Board Members:

Thank you for the opportunity to comment on the proposed amendments to the Suggested Control Measure (SCM) for Architectural Coatings. The Air Resources Board staff did excellent work in developing these amendments. The staff of the Sacramento Metropolitan Air Quality Management District supports the proposed amendments to the SCM. Our district is in the process of preparing a plan to attain the federal 8-hour ozone standard, and VOC reductions from architectural coatings will be an important component of our plan. Analysis of the proposed limits indicates that the emission reductions that would be achieved in Sacramento would exceed the 15% reduction we had expected from this category.

We have followed the development of the proposed amendments through the public workshops and working group meetings. At the outset, Air Resources Board staff established a goal to achieve the maximum feasible emission reduction for each coating category, without using emissions averaging. Given historic objections from EPA over some district averaging provisions, we believe that this is the most sensible approach and that the proposed amendments will achieve that goal.

The elimination of emissions averaging will greatly simplify the enforcement process. District inspectors will readily be able to identify whether or not a specific coating is compliant. In addition, as noted by some coating manufacturers, averaging may create a competitive advantage for the certain manufacturers, allowing them to produce otherwise noncompliant coatings when they have other coatings to average against. Companies with a more limited variety of coatings may not be able to use the averaging option.

We also agree with the decision not to pursue reactivity-based standards for architectural coatings. While such an approach may have merit, we believe that more research would be needed to properly establish and implement reactivity-based standards.

We encourage you to adopt the proposed amendments to the SCM.

Sincerely,

Larry Greene



Air Pollution Control Officer
Sacramento Metropolitan Air Quality Management District