



AmericanCoatings
ASSOCIATIONSM

November 30, 2018

Karen Slattery
Department of Environmental Management
235 Promenade Street
Providence, RI 02908
karen.slattery@dem.ri.gov

RE: Regulation No. 35 - Control of Volatile Organic Compounds and Volatile Hazardous Air Pollutants from Wood Products Manufacturing Operations; ACA Comments

The American Coatings Association (ACA)¹ respectfully submits comments on Regulation No. 35 - Control of Volatile Organic Compounds and Volatile Hazardous Air Pollutants from Wood Products Manufacturing Operations.

Compliance Date - as currently written it appears that the proposed changes (VOC and HAP limits) would take effect immediately after adoption. ACA suggests providing a one year compliance date after adoption to allow manufacturers and applicators time to comply with this rule.

Manufacturers and distributors employ extensive computer systems that require upgrades to incorporate new formulations and ensure non-compliant products are not sold into jurisdictions with new VOC limits. Manufacturers will need sufficient time to properly communicate these changes to their distributors and customers to ensure compliance with amended VOC limits. Finally, most companies wait until a rule is finalized (i.e. its requirements are certain) before implementing changes to ensure compliance because it helps minimize the costs of implementation and compliance. However, this also means that companies will not implement changes during the early parts of a rulemaking and will need adequate time after finalization of the amendment to make appropriate changes. Thus, industry

¹ The American Coatings Association (ACA) is a voluntary, nonprofit trade association working to advance the needs of the paint and coatings industry and the professionals who work in it. The organization represents paint and coatings manufacturers, raw materials suppliers, distributors, and technical professionals. ACA serves as an advocate and ally for members on legislative, regulatory, and judicial issues, and provides forums for the advancement and promotion of the industry through educational and professional development services.

typically needs an adequate lead time to properly implement necessary changes to comply with the proposed amendments.

Thank you for your consideration of our request. Please do not hesitate to contact me if you have any questions.

Sincerely,

/s/

David Darling
VP, Health, Safety and Environmental Affairs
American Coatings Association