



AmericanCoatings

ASSOCIATIONSM

June 14, 2019

Karen Slattery
Rhode Island Department of Environmental Management
Office of Air Resources
235 Promenade St.
Providence, RI 02908
Email - karen.slattery@dem.ri.gov

RE: Proposed Amendments to 250-RICR-120-05-19 – Control of Volatile Organic Compounds from Surface Coating Operations; ACA Comments

Dear Ms. Slattery:

The American Coatings Association (ACA)¹ submits the following comments on the Rhode Island Department of Environmental Management's Proposed Amendments to 250-RICR-120-05-19 – Control of Volatile Organic Compounds from Surface Coating Operations.

Pleasure Craft Coatings

Please see attached for a letter from the U.S. Environmental Protection Agency (EPA), dated June 1, 2010, detailing changes to the Control Techniques Guidelines (CTG) for Miscellaneous Metal and Plastic Parts Coatings, which includes specific revisions to Pleasure Craft VOC limits and definitions. Several states have included these changes to their Pleasure Craft rules, including Maine, Maryland, Massachusetts, New Hampshire, New Jersey, Ohio, Pennsylvania, and Virginia. In the spirit of consistency, ACA suggests that the Rhode Island Department of Environmental Management include the following changes to the Pleasure Craft regulations:

- Add an additional specialty category for “Antifouling Sealer/Tie Coat” with a VOC limit of 420 g/L (3.5 lbs. VOC/gallon);
- Change the VOC limit for “Other Substrate Antifoulant Coating” from 330 to 400 g/L (3.4 lbs. VOC/gallon);
- Change the VOC limit for “Extreme High Gloss” from 420 to 600 g/L (5.0 lbs. VOC/gallon); and
- Revise the definition of “Extreme High Gloss Coating” to read: “Extreme high gloss coating means any coating which achieves greater than 90 percent reflectance on a 60 degree meter when tested by ASTM Method D 523-89.”

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.

Paper, Film, or Foil VOC Content Limits

ACA noticed a possible clerical error regarding the proposed VOC content limit for “Paper, film or foil (non-pressure sensitive tape and label)”. In the table on page 47 of the proposed rule, the Rhode Island Department of Environmental Management included a VOC content limit of 0.04 lbs. VOC per lb. solids. ACA believes that this is an error and that the limit should be 0.4 lbs. VOC per lb solids.

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

Sincerely,

/s/

David Darling
Vice President, Health, Safety and Environmental Affairs

/s/

Rhett Cash
Counsel, Government Affairs