

PDCA

Your "Partner in Profit"

PDCA exists to lead the profession and industry by providing quality products, programs, services, and opportunities essential to the success of members.

RECEIVED
2-24-06

Monday, February 14, 2006

Christopher Recchia
Executive Director
Ozone Transport Commission
444 North Capitol Street, Suite 638
Washington, DC 20001

Re: Architectural and Industrial Maintenance (AIM)
Coatings Rule 1113

Dear Mr. Recchia:

We have recently been advised that the Ozone Transport Commission is currently considering adopting the VOC limits in SCAQMD's Rule 1113. I am writing on behalf of the ***Painting and Decorating Contractors of America*** to request that OTC postpone adoption of those limits until further consideration is given to the consequences of such an action.

Founded in 1884, PDCA is the nation's oldest and largest association of painting and decorating contractors. Its primary purpose is to promote and defend the interests of the coating application industry. Among other things, its activities include development of business education programs for painting and decorating contractors; promulgation of coating application industry standards; representation of the industry's interests, both legislatively and administratively; and collection and dissemination of painting and decorating industry data. PDCA has members in all fifty states, as well as in Australia, Canada, Germany, Ghana, and Mexico.

As I'm sure you're well aware, the principal means by which VOC emission reductions are achieved is through product reformulation – in other words, by changing the way the coating is currently manufactured in order to lower its VOC content. Among the options available for changing the way coatings are formulated are replacing VOC solvents with non-VOC solvents; using a waterborne latex or water-soluble resin system; increasing the solids content of the coating; or changing the chemistry of the resin so that less solvent is needed for the required viscosity.

While any or all of these approaches – in the abstract, at least – may very well yield more compliant coatings, unless how well such coatings perform is also accounted for, they could very well end up posing new, unintended consequences, such as requiring vastly more paint to have to be applied.

This is not to say that we do not believe reducing VOC emissions is a worthy goal. It is. However, we do not believe that to this point adequate consideration has been given to reconciling this goal with the expectations customers have for such factors as durability and performance.

Given that PDCA members will ultimately be the ones faced with having to apply reformulated – and assumedly, more compliant – coatings, on the one hand, and making certain they fulfill the expectations of their customers, on the other, we believe industry professional concerns should be given fuller consideration before any further action is taken to adopt this rule.

Thank you for the opportunity to comment on this matter. If there is anything more I can do to be helpful to the Commission in its deliberations, please don't hesitate to let me know.

Sincerely,



Dr. Ian R. Horen, CAE
PDCA Chief Executive Officer

Cc: Vince Sandusky, CEO, FCA
Bob Ziegler, Exec. V.P., FSCT
Barry Law, President, MPI
Andrew Doyle, President, NPCA
Kenneth Zacharias, Director, Industry Affair, NPCA
Dr. Ian Horen, CEO, PDCA
Nicholas R. Cichielo, CEO & Publisher, PDRA
Gary Cohen, Exec. Dir., RadTech Intl, N.A.
William Shoup, Exec. Dir., SSPC
Burt Olhiser, Kleen Ind. Services