



the society for protective coatings

"Promoting Coatings, Providing Knowledge."

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April 14, 2006

Mr. Christopher Recchia
Executive Director
OTC
444 North Capitol Street, Suite 638
Washington, DC 20001

Re: Possible Adoption of SCAQMD Rule 1113 by the Ozone Transport Commission

Dear Mr. Recchia:

SSPC: The Society for Protective Coatings would like to offer comments regarding possible adoption of the South Coast Air Quality Management District (SCAQMD) Rule 1113 by the Ozone Transport Commission (OTC).

About SSPC

SSPC was founded in 1950 as the Steel Structures Painting Council, a non-profit professional society concerned with the use of coatings to protect industrial steel structures. In 1997, the name of the association was changed to The Society for Protective Coatings to better reflect the changing nature of coatings technology and the ever-expanding types of construction materials. SSPC's membership encompasses 3950 individual members and 740 organizational members, representing public and private facility owners (e.g., DOTs, petrochemical companies), architects, engineers, painting contractors, equipment suppliers, and coating manufacturers.

SSPC is the only non-profit association that is focused on the protection and preservation of concrete, steel and other industrial and marine structures and surfaces through the use of high-performance industrial coatings. SSPC is the leading source of information on surface preparation, coating selection, coating application, environmental regulations, and health and safety issues that affect the protective coatings industry.

Comments

SSPC has polled its membership concerning possible adoption of SCAQMD Rule 1113. Based on member responses and comments SSPC agrees in principle on the need for reduction of VOC content in industrial maintenance coatings. However SSPC respectfully requests that the OTC consider a more gradual phase-in of VOC restrictions on industrial maintenance coatings than those prescribed by Rule 1113 in order to give coating

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manufacturers additional time to adjust formulations to reduce VOC levels without compromising coating performance.

If the Rule is adopted, owner maintenance costs could rise dramatically, due to increased initial coating and application costs and the need for more frequent maintenance.

- Many of the new low-VOC systems require more thorough and extensive surface preparation than the systems they will replace.
- In addition, low-VOC coating systems may require application of 3 coats to replace the 2-coat systems currently in use.
- The coating systems currently being used in the areas that have adopted Rule 1113 have not been in service long enough to prove performance comparable to the coatings they have replaced. In the severe exposure environments of the OTC states, it is felt that few if any industrial coatings currently available can meet the VOC limit of 100 g/L imposed by SCAQMD Rule 1113 *while maintaining current performance levels.*

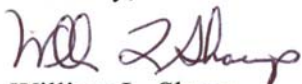
Finally, the need for more frequent and extensive maintenance could ultimately result in higher total VOC emissions over time due to the need to apply coatings more frequently.

Conclusion

SSPC members polled agreed that OTC should consider lowering VOC limits incrementally over a longer time period. While they realize that incentive must be provided for industry to adapt to lower VOC limits, the proposed reduction of VOC levels for AIM coatings from 340 g/L to 100 g/L within the next year could result in dramatic increases in cost without correspondingly lowering VOC emissions overall, especially if VOC-compliant systems do not provide performance commensurate with that of the systems they are replacing. Members further agreed that the OTC should monitor the performance data of low-VOC systems currently in use in the SCAQMD area, and evaluate that data in terms of cost vs. benefit while phasing in reduced VOC limits over a longer-term period, rather than immediately adopting the provisions of Rule 1113.

Thank you for your consideration.

Sincerely,



William L. Shoup
SSPC Executive Director

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