

Tate

#263 RECEIVED

RECEIVED



October 22, 2007

2007 OCT 30 PM 1:40

07 OCT 26 AM 11:44

Kathleen A. McGinty
PA DEP Environmental Quality Board,
P.O. Box 8477
Harrisburg, PA 17105-8477

INDEPENDENT REGULATORY
REVIEW COMMISSION

ENV. PROTECTION
SECRETARY'S OFFICE

RECEIVED

OCT 26 2007

RE: Proposed Amendments to Chapter 130; NPCA Comments ENVIRONMENTAL QUALITY BOARD

Dear Chairperson McGinty:

The National Paint and Coatings Association (NPCA)¹ requests a revision to subchapter C (Architectural and Industrial Maintenance (AIM) coatings) consistent with the October 16, 2007 comment letter submitted by Daniel Poureau of the Lyondell Chemical Company. Specifically, subchapter C includes definitions for both VOCs and Exempt Compounds that are inconsistent with the federal definitions, your general definitions, your consumer products definitions and those of all other OTC states. These outdated definitions were left over from the OTC model rule and should be deleted.

NPCA respectively requests that the Board approve the deletion of the VOC and Exempt compound definitions in Subchapter C as part of your final consumer products rule. This will harmonize your VOC definitions and make the latest VOC exempt compounds available as tools to reduce ozone formation from architectural coatings. In addition, this will eliminate the need to revise subchapter C each time the federal VOC definition is amended, thus saving DEP resources.

Thank you for your consideration of our comments. Please do not hesitate to contact us if you have any questions or need additional information.

Sincerely,

David F. Darling, P.E.,
Director, Environmental Affairs

Alison Keane
Counsel, Government Affairs

** Sent via email and in hard-copy **

¹ NPCA is a voluntary, nonprofit trade association representing some 350 manufacturers of paints, coatings, adhesives, sealants, and caulks, raw materials suppliers to the industry, and product distributors. As the preeminent organization representing the coatings industry in the United States, NPCA's primary role is to serve as ally and advocate on legislative, regulatory and judicial issues at the federal, state, and local levels. In addition, NPCA provides members with such services as research and technical information, statistical management information, legal guidance, and community service project support.

