



# AmericanCoatings

ASSOCIATION<sup>SM</sup>

August 3, 2020

Danny McQuillan  
Ventura County Air Pollution Control District  
669 County Square Drive, 2nd Floor  
Ventura, CA, 93003  
danny@vcapcd.org

**RE: Proposed Amendments to Rule 74.2 – Architectural and Industrial Maintenance (AIM) Coatings; ACA Comments**

Dear Mr. McQuillan:

The American Coatings Association (ACA)<sup>1</sup> submits the following comments on the proposed amendments to Ventura County Air Pollution Control District (Ventura) Rule 74.2 – Architectural and Industrial Maintenance (AIM) Coatings.

**Consistency with 2019 California Air Resources Board (CARB) Suggested Control Measure (SCM)**

ACA participated extensively in the development of the 2019 CARB SCM in an effort to ensure that it is reasonable and appropriate for all California Air Districts. With the goal of consistency throughout California, in many of the following comments, ACA suggests Ventura adopt amendments that are as consistent with the 2019 CARB SCM as possible.

**Compliance Date**

ACA members will require at least a year to adjust production, labeling, and distribution networks to efficiently and effectively implement the proposed amendments to Rule 74.2. Therefore, ACA requests a compliance date of at least one year after rule adoption, however we prefer 1/1/2022 to match the compliance dates in the 2019 SCM and San Joaquin. Manufacturers, distributors, and retail stores employ extensive computer systems that require upgrades to ensure products are not sold into the District that are not compliant with the amendments. Furthermore, manufacturing and labeling costs are expensive, and architectural coatings manufacturers tend to manage formulation changes to their products to minimize costs stemming from obsolete products and labels. Additionally, manufacturers

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<sup>1</sup> 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.

will need sufficient time to properly communicate these changes to their distributors and retail customers to ensure compliance with the contingency measure. Finally, most companies wait until the amendment measures kick-in (i.e. the requirements are certain) before implementing changes to ensure compliance because it helps minimize the costs of implementation (including expensive label stock) and compliance.

### **Building Envelope Coating**

While we believe this has been addressed, please note that Building Envelope Coatings (50 g/l) was not included in the Table of Standards or definitions.

### **Colorant Table of Standards Compliance Date**

ACA requests Ventura include at least a 7/1/2021 compliance date for all the categories listed in Table 2: VOC Limits for Colorants.

### **“For Sale” and “For Use” Language**

For consistency with the 2019 CARB SCM, ACA recommends the following changes to Section B.1. This language is inconsistent not only with the SCM, but also with the Section A. Applicability. The practical effect of this discrepancy is to nullify the requirements -- because they do not fall within the scope of applicability of the rule.

#### **B. Requirements**

1. VOC Content Limits: Except as provided in Subsections B.2 and B.3, no person shall: (i) manufacture, blend, or repackage for ~~sale~~ use within the District; (ii) supply, sell, market, or offer for sale for use within the District; or (iii) solicit for application or apply within the District, any architectural coating with a VOC content in excess of the corresponding limit specified in the following Tables. Limits are expressed as VOC Regulatory (unless otherwise specified) thinned to the manufacturer’s maximum recommendation, excluding colorant added to the tint bases. "Manufacturer’s maximum recommendation" means the maximum recommendation for thinning that is indicated on the label or lid of the coating container.

### **Colorant Point of Sale language**

In Section B.6, ACA recommends Ventura add the language in **bold** below to be consistent with the 2019 CARB SCM:

Colorants: Effective January 1, 2021, no person within the District shall, at the point of sale of any architectural coatings subject to the VOC coating limits in Subsection B.1, add to such coating any colorant that contains VOC in excess of the corresponding applicable VOC limit specified in the following Table 2. Colorant added at the factory or at the worksite is not subject to the VOC limit in

Table 2. *The point of sale includes retail outlets that add colorant to a coating container to obtain a specific color.*

### **Specialty Primer, Sealer, Undercoater**

ACA recommends Ventura retain the Specialty Primer, Sealer, Undercoater (SPU) category and 100 g/l limit for consistency with the 2019 CARB SCM. ACA reviewed the 2012 Rule 74.1 amendments and the SPU limit dropped from 350 g/l to 100 g/l. The category was retained, but the SPU definition did not contain any transitional language that the SPU category was to be eliminated. Although Ventura did note in the definition that “Until January 1, 2012, the Specialty Primer, Sealer, and Undercoater category includes coatings formulated to seal excessively chalky surfaces”, it is also important to note that SCAQMD Rule 1113 contains the SPU category and limit.

### **High Temperature Industrial Maintenance Coating Definition**

For consistency and to avoid confusion, ACA recommends Ventura remove “Industrial Maintenance” from the High Temperature Coating Definition. The proposed Industrial Maintenance language would subject High Temperature coatings to the Industrial Maintenance Restriction such that High Temperature coatings could not be used in hotels, jails, etc.

### **Sell Through Language**

ACA recommends removing the proposed additional Sell-Through language in Section B.3.a: “(excluding any coating subject to Current Limits).” This language is not consistent with the 2019 CARB SCM and will cause unnecessary confusion amongst the regulated community.

### **Manufacturers of Recycled Coatings Certification**

ACA recommends removing the Recycled Coatings Certification requirement in Section B.10. ACA does not see any commensurate benefit that offsets the burden associated with these certification requirements.

### **Industrial Maintenance and Floor Coatings**

CARB clarified in the 2007 SCM and 2019 SCM Staff Reports that the Floor Coatings category is not intended for products that are applied to industrial/institutional/commercial floors or clear coatings for wood floors. Those types of products would be covered by other categories (e.g., Concrete/Masonry Sealers, Industrial Maintenance Coatings, Wood Coatings, etc.).

For consistency, ACA suggests that Ventura adopt the Industrial Maintenance and Floor Coating definitions found in the 2019 SCM. Alternatively, Ventura could mention in the Floor Coating definition which categories of coatings could be used for industrial/institutional/commercial floors or clear coatings for wood floors, as follows:

"Floor Coating": An opaque coating that is labeled and formulated for application to flooring, including, but not limited to, decks, porches, steps, garage floors, and other horizontal surfaces which may be subject to foot traffic. The Floor Coating category is not intended for products that are applied to industrial floors, public bathroom floors, or jail floors. In addition, clear coatings for wood floors are not subject to the VOC limits of this coating category. *Those types of products would be covered by other categories (e.g., Concrete/Masonry Sealers, Industrial Maintenance Coatings, Wood Coatings, etc.).*

## **Manufacturer's Maximum Recommendation**

At the end of the Requirements paragraph (Section B1), Ventura includes a definition that is found in the definitions section of the SCM: "'Manufacturer's maximum recommendation' means the maximum recommendation for thinning that is indicated on the label or lid of the coating container." For consistency, and to not mix definition and requirements, ACA recommends this language be moved to the definitions section of the rule.

## **Shellac**

ACA suggests Ventura use the 2019 CARB SCM Shellac definition (a) to maintain consistency with the SCM and achieve substantial statewide uniformity of regulation; and (b) to avoid placing what appears to be a requirement into a definition -- in fact, definitions cannot impose requirements. Otherwise, a coating could not be categorized as a Shellac until after it is applied for one or more of the specified purposes -- meaning, the sale of the uncategorized coating would be subject to the default limit of 50 g/L -- clearly an unacceptable outcome. ACA suggests the following edits:

"Shellac": A clear or opaque coating formulated solely with the resinous secretions of the lac beetle (*Lacifer lacca*) and formulated to dry by evaporation. ~~without a chemical reaction providing a quick-drying, solid, protective film for priming and sealing stains and odors; and for wood finishing excluding floors.~~

## **VOC Conversion Factor**

ACA recommends that Ventura utilize the following Conversion factor: one pound VOC per gallon (U.S.) = ~~419.95~~ 119.83 grams VOC per liter.

## **Formulation Data**

For consistency with the 2019 SCM, ACA recommends that Ventura remove the following language from the definition of Formulation Data: "Material Safety Data Sheets (MSDS) are not considered formulation data." Note the term MSDS has been replaced by Safety Data Sheet (SDS).

Furthermore, in Section G.1, Ventura mentions that the manufacturer can determine VOC content by using formulation data, or any reasonable means for predicting that the coating has been formulated as intended (e.g. quality assurance checks, recordkeeping) (see below). ACA suggests that SDS's may be a reasonable means of predicting the VOC content of a coating, regardless of whether there is an

inconsistency between Method 24 and other means for determining VOC content. The Method 24 results will govern.

G. Testing Procedures: 1. Volatile Organic Compound Content: To determine the physical properties of a coating in order to perform the calculations in Section J.681 or J.7063, the reference method for VOC content is EPA Method 24, incorporated by reference in Subsection G.4.i, or South Coast AQMD Method 313 “Determination of VOC by Gas Chromatography-Mass Spectrometry” or ASTM Test Method 6886 “Standard Test Method for Determination of the Weight Percent Individual VOCs in Waterborne Air-Dry Coatings by Gas Chromatography”, except as provided in Subsections G.2 and G.3. An alternative method to determine the VOC content of coatings is the SCAQMD Method 304-91 (Revised February 1996), incorporated by reference in Subsection G.4.j. The exempt compounds content shall be determined by test methods referenced in Subsections G.4.f, G.4.g, or G.4.h, as applicable. To determine the VOC content of a coating, the manufacturer may use USEPA Method 24, or an alternative method as provided in Subsection G.2, formulation data, or any reasonable means for predicting that the coating has been formulated as intended (e.g. quality assurance checks, recordkeeping). However, if there are any inconsistencies between the results of a Method 24 test and any other means for determining VOC content, the Method 24 test results will govern, except when an alternative method is approved as specified in Subsection G.2. The APCO may require the manufacturer to conduct a Method 24 analysis.

### **Exempt Compound Definition**

Please note a typo - “Methy” Acetate should be “Methyl”

### **2015 Ozone Standard SCE Contingency Measure**

ACA understands that Ventura will need to develop 2015 Ozone Standard contingency measures and recommends Ventura not adopt a SCAQMD Small Container Exemption (SCE) contingency measure. This is the last alternative compliance option remaining in 74.1 and allows the use of traditional products in challenging application scenarios, such as cold and wet weather and elevated areas in the Ventura County Air Pollution Control District (see comments in Attachment A). ACA believes that NOx emission reductions are more effective. If over our objection Ventura does adopt the SCAQMD SCE contingency measure, then ACA recommends that Ventura utilize the San Joaquin SCE contingency measure as a basis for the Ventura measure.

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

## **Attachment A - ACA Concerns with SCAQMD Small Container Exemption Contingency Measure**

ACA did not support the changes that the South Coast Air Quality Management District (SCAQMD) made to the Rule 1113 AIM Small Container Exemption (SCE), so therefore we do not support Ventura adopting any of the SCAQMD SCE provisions in the future. The small container exemption is the only remaining alternative compliance option, or “safety valve” in the Ventura AIM Rule and as a last resort allows the use of traditional products in challenging application scenarios such as cold, wet weather and elevated areas in Ventura.

SCAQMD has on many occasions stated that Rule 1113 limits are only meant for SCAQMD and not the rest of California. In the 2007 California Air Resources Board AIM Suggested Control Measure (SCM) staff report (page 17):

“The proposed SCM needs to be suitable for a variety of climates. As South Coast AQMD staff has said in public meetings, some of the VOC limits in their rule, specifically for Nonflat and Nonflat-High Gloss Coatings, are not intended necessarily for areas outside of the South Coast AQMD. There are concerns with freeze/thaw stability and dirt pick up due to removal of VOCs to meet the lower limits. This concern also applies in varying degrees to the other categories mentioned above [including Nonflat Coatings, Nonflat-High Gloss Coatings, Rust Preventative Coatings].

In addition, CARB specifically mentions in the 2019 AIM SCM Staff Report (page 42) that it retained the SCE because it is effective way of addressing niche applications and providing flexibility:

“The proposed SCM retains the small container exemption, because staff has found it to be an effective way of addressing niche applications and providing flexibility without a significant loss of emission reductions. CARB staff does not believe that the small container exemption needs to be updated or deleted at this time. CARB staff will monitor the emissions from small containers as part of future surveys and will assess the feasibility of regulating small containers.”

As the California Air Districts continue to lower AIM VOC limits, including adopting the 2019 CARB AIM SCM, industry and end users still need the limited relief the small container exemption can provide. The concern is that lowering the VOC limits (including Nonflat and Nonflat High Gloss Coatings) while simultaneously restricting the small container exemption, will put tremendous pressure on the industry and, potentially, create an impossible compliance scenario. This is one reason that the small container exemption exists within the comprehensive framework of the 2019 CARB AIM SCM. It is important to keep in context that the limits in the 2007 and 2019 CARB SCMs were developed knowing that the small container exemption would be available. The low VOC AIM limits are only achievable in conjunction with the small container exemption. If ACA knew at the time the 2007 and 2019 CARB SCM limits were being developed, that Ventura would be removing or changing the exemption, we would have fought much harder to retain higher limits for many categories. The small container exemption allows for the continued small volume usage of higher VOC formulations while allowing the category limits to reflect the higher volume water-based (i.e. lower VOC content) formulations.

ACA therefore does not support Ventura adopting the SCAQMD SCE provisions, instead ACA

supports Ventura adopting more effective NOx measures.

If over our objection, Ventura includes a small container exemption contingency measure, ACA requests Ventura increase the VOC limits for the categories impacted by the SCE provisions including but not limited to Wood Coatings; Flat; Nonflat and Nonflat High Gloss Coatings; and Rust Preventatives.

The following are a few examples as to why the small container exemption is important:

#### 1. Original Manufacturing Equipment (OEM) Touchup

Many original equipment manufacturing (OEM) product manufacturers need to supply customers with touch-up coatings (via the small container exemption) so that the products can be touched up in the field. Such OEM products include farm and construction equipment, building exterior cladding, structural steel, and industrial equipment. If touch-up products are not available through the small container exemption, users may be forced to apply other products, resulting in increased corrosion or undesired appearance. Alternatively, this could also lead to a negative impact on overall emissions if an entire repaint or return transportation to the manufacturer is needed to address either performance and appearance problems.

#### 2. Rust Preventatives

Solvent borne rust preventatives are vitally important and necessary in the cold and elevated climates of the San Joaquin. Rust preventatives are effective, durable, single component products that prevent the corrosion of metal substrates including doors, fences, lighting fixtures, exterior furniture. Homeowners and contractors find solvent borne rust preventatives very useful since they can be applied directly to metal surfaces, including rusty or previously coated surfaces without the need for surface preparation or primer and provides a long lasting durable finish. As compared to waterborne products, solvent borne products dry faster and can be applied in colder weather. Painting projects using waterborne products tend to take more time since waterborne products likely require additional surface preparation and a prime coat and don't perform as well.

#### 3. Historic Building Preservation

California has a large inventory of natural stone buildings in need of restoration. Higher VOC consolidation treatment products, only available in California via the small container exemption, are critical to restoring and protecting natural stone buildings, especially giving the cold and elevated climates in San Joaquin. Historic Preservationists use these products to replace the natural binding materials of the deteriorated stone while protecting the treated surface from further water-related damage.

#### 4. Extreme High Gloss

Many architectural design professionals demand extreme high gloss coatings to execute their style concepts when they design or redesign kitchen and other spaces in apartments, homes and commercial establishments. Extreme high gloss coatings are also frequently used on exterior doors and window trims to provide durable finishes that can stand up to San Joaquin's diverse climate and these are typically sold in small containers since the volumes required for a door or window trim are small. These products are also used in many historical restoration projects throughout the country. It is

important to note that the market for extreme gloss coatings for trim, cabinets and doors is a small niche market, with limited environmental impact, that can only remain via the continued use of the small container exemption.

5. If the small container exemption is removed, Ventura would need to adopt additional coating categories and raise VOC limits

There are a host of niche coatings that manufacturers now sell in small containers that would need to be added to the rule (categorized) if the small container exemption is modified or eliminated. Products that must be added include:

- Farm equipment refinish and touch-up
- Tile touchup
- Porcelain tub/sink touchup
- Magnetic coatings
- Chalkboard coatings
- White board coatings
- Camouflage coatings
- Projection TV coatings
- Wood stains and wood stain markers
- Appliance touch-up
- Samples
- Touch-up for wood products (allow proper repairs following installation of kitchen cabinets, bathroom vanities, doors and millwork)
- Coatings that are not manufactured as architectural coatings but may become subject to the AIM Rule by virtue of being applied to stationary structures or their appurtenances; e.g., hobby paints, marine varnish, and various kinds of touch-up paints.
- Door kits containing quart size cans of primer and topcoat
- Garage Floor Kits
- Kitchen Cabinet Refinish Kits

Absent the small container exemption and lower VOC limits, manufacturers are left in an impossible compliance scenario. As mentioned herein, if over our objection, Ventura includes the small container exemption contingency measure, Ventura would need to increase the VOC limits for many categories of coatings.





August 28, 2020

David Darling  
American Coatings Association  
901 New York Avenue, NW  
Suite 300 West  
Washington, DC 20001

RE Proposed Amendments to Rule 74.2 – Architectural and Industrial Maintenance (AIM)  
Coatings; ACA Comments

Dear Mr. Darling:

Thank you for your comments dated August 3, 2020. We are impressed with the efforts by your industry to provide new products that meet or exceed air pollution control requirements. Our responses to your comments are summarized below.

1. Request that Ventura County APCD adopt amendments that are as consistent with the 2019 CARB SCM as possible.

Response: Staff at Ventura County APCD recognize the importance for consistency but retain the ability to be more stringent when feasible due to our nonattainment status and shared distribution network with South Coast AQMD as discussed in the 2019 CARB SCM.

2. The American Coatings Association (ACA) requests a compliance date of at least one year after rule adoption, while preferring 1/1/2022.

Response: Due to coatings that meet or exceed the proposed limits being available already in the neighboring South Coast, a 2022 compliance date is not warranted. However, to allow electronic systems to be updated and retail locations be informed of changes, Ventura County APCD will delay the compliance date to 7/1/2021.

3. Please note that the Building Envelope Coatings was not included in the Table of Standards or definitions.

Response: This has been corrected and Building Envelope Coatings are now included in the Table of Standards with a ROC content limit of 50 g/l.

4. Colorant Compliance date: ACA suggests a compliance date of at least 7/1/2021 for all the categories listed in Table 2: VOC Limits for Colorants.

Response: As requested, Ventura County APCD added a compliance date of 7/1/2021 for all the categories listed in Table 2: VOC Limits for Colorants.

5. “For Sale” and “For Use” Language: ACA recommends minor changes to Section B.1, to maintain consistency with 74.2, Section A. Applicability, and the 2019 CARB SCM.

Response: As requested, Ventura County APCD staff has included the suggested language to maintain consistency with Section A, and the 2019 CARB SCM.

6. Colorant Point of Sale Language: ACA recommends adding language specifying that point of sale includes retail outlets that add colorant to a coating container to obtain a specific color, to be consistent with the CARB SCM.

Response: As requested, Ventura County APCD staff has included the suggested language to maintain consistency with the 2019 CARB SCM.

7. Specialty Primer, Sealer, Undercoater: ACA recommends Ventura retain the Specialty Primer, Sealer, Undercoater category to maintain consistency with the 2019 CARB SCM.

Response: As requested, Ventura County APCD staff has retained the Specialty Primer, Sealer, Undercoater category to maintain consistency with the 2019 CARB SCM.

8. High Temperature Industrial Maintenance Coating Definition: ACA recommends the removal of "Industrial Maintenance" from the High Temperature Coating Definition.

Response: As requested, Ventura County APCD staff removed the "Industrial Maintenance" language from the High Temperature Coating definition.

9. Sell Through Language: ACA recommends the removal of language which excludes any coating subject to current limits.

Response: As requested, Ventura County APCD staff removed the language "(excluding any coating subject to Current Limits)" from 74.2.B.3.a and b.

10. Recycled Coating Certification: ACA recommends removal of the Recycled Coatings Certification requirement found in Section B.10.

Response: As requested, Ventura County APCD staff removed the Recycled Coatings Certification requirement formerly found in Section B.10 to maintain consistency with the 2019 CARB SCM.

11. Industrial Maintenance and Floor Coatings: ACA recommends either the adoption of the SCM definitions for Floor Coatings and Industrial Maintenance Categories, or the addition of language in the Floor Coating definition which clarifies requirements.

Response: As requested, Ventura County APCD staff has included the language "Those types of products would be covered by other categories (e.g., Concrete/Masonry Sealers, Industrial Maintenance Coatings, Wood Coatings, etc.)" in the Floor Coatings definition.

12. Manufacturer's Maximum Recommendation: ACA recommends moving the definition for Manufacturer's Maximum Recommendation from B.1 to Section J. Definitions.

Response: As requested, Ventura County APCD staff moved this definition from B.1 to a new definition in Section J. Definitions.

13. Shellac: ACA recommends using the 2019 CARB SCM definition for Shellac.

Response: As requested, Ventura County APCD staff amended the definition of Shellac to match the 2019 CARB SCM.

14. VOC Conversion Factor: ACA recommends updating the VOC conversion factor to: One pound VOC per gallon (U.S.) = 119.83 grams VOC per liter.

Response: As requested, Ventura County APCD staff amended the VOC conversion factor to reflect the updated grams per liter value.

15. Formulation Data: ACA points out that Material Safety Data Sheets (MSDS) have been replaced with Safety Data Sheets (SDS) and recommends the deletion of language which prevents to use of MSDS to determine VOC content to maintain consistency with 2019 CARB SCM language.

Response: As requested, Ventura County APCD staff amended the language to reflect the use of SDSs instead of MSDSs. However, staff will continue to not allow the use of SDSs for the determination of VOC content due to a lack of standardization in determining this value in SDSs. Furthermore, South Coast AQMD does not allow the use of SDSs to determine VOC content and will not result in any additional burden on industry.

16. Exempt Compound Definition: "Methy Acetate" should be "Methyl Acetate".

Response: As requested, Ventura County APCD staff amended the language to reflect the proper spelling of Methyl Acetate.

14. 2015 Ozone Standard SCE Contingency Measure: ACA recommends not to eliminate the small container exemption as a contingency measure for the 2015, 70 ppb, ozone standard.

Response: Ventura County APCD has not committed to any contingency measures yet and will take your response into account when developing contingency measures for meeting the 2015 ozone standard. Please note however, that while we agree about the potential usefulness of this exemption in high altitude areas experiencing extreme freeze/thaw conditions, Ventura County has a very temperate climate devoid of such conditions. Furthermore, as you may be aware, misuse of this exemption in years past in neighboring districts contributed greatly to its elimination. To help avoid similar issues developing in our district, staff will be favorably viewing this measure as an attractive low-cost contingency measure candidate, especially given our temperate climate.

If you have any additional concerns about the proposal to amend Rule 74.2, you can reach me at (805) 645-1432 or via email: [danny@vcapcd.org](mailto:danny@vcapcd.org).

David Darling  
American Coatings Association  
August 28, 2020  
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Sincerely,

A handwritten signature in blue ink, appearing to read "Danny McQuillan", with a long horizontal flourish extending to the right.

Danny McQuillan  
Air Quality Engineer  
Ventura County APCD



THE #1 CHOICE OF  
PAINTING PROFESSIONALS®

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August 3, 2020

VIA EMAIL

danny@vcapcd.org

Danny McQuillan  
Ventura County Air Pollution Control District  
669 County Square Drive, 2<sup>nd</sup> Floor  
Ventura, CA 93003

**RE: Proposed Amendments to Rule 74.2: Architectural Coatings**

Dear Mr. McQuillan:

Dunn-Edwards Corporation is a Southwestern regional manufacturer and distributor of architectural coatings. Our Main Office and almost half our retail outlets are located in Southern California. We employ more than 800 people directly in Southern California, and contribute indirectly to the livelihoods of thousands more professional painting contractors and maintenance staff painters throughout the region.

As a member of the American Coatings Association ("ACA"), Dunn-Edwards supports the ACA letter authored by David Darling and submitted to the Ventura County Air Pollution Control District on August 3, 2020, commenting on the proposed amendments to Rule 74.2: Architectural Coatings. We urge the District to modify the proposed amendments in the manner suggested in the ACA letter.

These changes would better align the proposed amended rule with the Air Resources Board 2019 Suggested Control Measure for Architectural Coatings. We believe this is important to achieve substantial statewide uniformity of regulation, which will make both compliance and enforcement easier and more efficient.

Thank you for your consideration of our views.

Very truly yours,

DUNN-EDWARDS CORPORATION

A blue ink signature of Robert Wendoll, written in a cursive style.

Robert Wendoll  
Director of Environmental Affairs



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**Dr. Laki Tisopulos, P.E.  
Air Pollution Control Officer**

August 28, 2020

Robert Wendoll  
Dunn Edwards Corporation  
4885 East 52<sup>nd</sup> Place  
Los Angeles, CA 90058

RE Proposed Amendments to Rule 74.2: Architectural Coatings

Dear Mr. Wendoll:

Thank you for your comments dated August 3, 2020. We are impressed with the efforts by your company to provide new products that meet or exceed air pollution control requirements. Your comment which shared the support of all recommendations by the American Coatings Association (ACA) has been noted, and we have included a copy of our response to comments submitted by the ACA for your own records.

If you have any additional concerns about the proposal to amend Rule 74.2, you can reach me at (805) 645-1432 or via email: [danny@vcapcd.org](mailto:danny@vcapcd.org).

Sincerely,

A handwritten signature in blue ink, appearing to read "Danny McQuillan", with a long, sweeping horizontal line extending to the right.

Danny McQuillan  
Air Quality Engineer  
Ventura County APCD