

Message

From: David Darling [ddarling@paint.org]
Sent: 3/2/2018 12:54:35 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; Dravis, Samantha [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ece53f0610054e669d9dffe0b3a842df-Dravis, Sam]; John.M.Mulvaney [Ex. 6]
CC: Caparoso, Jennifer [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=78412d4056534ef288fb8ce390b4bf17-Caparoso, J]
Subject: American Coatings Association (ACA) MCM concerns
Attachments: ACA MCM Concern letter 22018 final version .pdf

Good morning, please find attached an American Coatings Association (ACA) letter of concern with regard to the Miscellaneous Coatings Manufacturing (MCM) Residual Risk and Technology Review. As this rulemaking is moving rather quickly, the reason for this letter is to articulate our concerns as early as possible. This letter documents our concerns with inaccurate assumptions that EPA used in original MCM promulgation, we hope that EPA does not employ these assumptions to justify more stringent requirements. Consequently, given the relatively short rulemaking schedule, ACA requests that EPA's Office of Policy and the Office of Management and Budget (OMB) review the agency's development of this RTR rulemaking to ensure that our concerns are considered, and that the rule is technically sound and fair.

Please note that we will be following up later with suggestions on a possible work practice standard for start-up, shut-down and malfunction and a suggested exclusion from the rule applicability for operations that process or use organic HAP substances present only at incidental concentrations.

Please let me know if you have any questions.

Best regards,

David Darling, P.E.
VP, Health, Safety and Environmental Affairs
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Ex. 6