

Message

From: David Darling [ddarling@paint.org]
Sent: 4/19/2018 4:22:08 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]; John.M.Mulvaney [Ex. 6] Bolen, Brittany [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=31e872a691114372b5a6a88482a66e48-Bolen, Brit]
CC: Caparoso, Jennifer [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=78412d4056534ef288fb8ce390b4bf17-Caparoso, J]; Barnett, Keith [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=539d3cb498494c49a400212adc19d839-Barnett, Keith]
Subject: American Coatings Association (ACA) SSM concerns
Attachments: 2018.04.19 ACA SSM Concern.pdf

Good afternoon, please find attached an American Coatings Association (ACA) letter of concern with regard to removal of the Start-up, Shutdown and Malfunction (SSM) provisions of the Paper and Other Web Surface Coating MACT, Miscellaneous Coatings Manufacturing (MCM) and the Miscellaneous Organic Chemical Manufacturing (MON) MACT rules. ACA is concerned that removing these provisions will make it difficult, or in some cases impossible, for some facilities to meet the rules' emission limitations during SSM periods, and especially during periods of malfunction of an emission control device. ACA therefore requests that, if the SSM provisions are removed, EPA add work practice standards for periods of malfunctions (see attached Malfunction Work Practice Standard). Alternatively, ACA requests that EPA identify the issue clearly and request public comment in the preamble of each RTR-related rule revision, thereby providing EPA an opportunity to "pivot" on the issue without re-proposing the rules. Given the relatively short rulemaking schedule for these rules, 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 let me know if you have any questions.

Best regards,

David Darling, P.E.
VP, Health, Safety and Environmental Affairs
American Coatings Association
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Washington, DC 20001

[Ex. 6]