

From: Dave Darling [ddarling@paint.org]
Sent: Tuesday, May 30, 2006 3:39 PM
To: jhavens@state.pa.us
Cc: cecchia@otcair.org
Subject: NPCA May 30 PA Letter.doc

May 30, 2006

Mr. J. Wick Havens, Chief, Division of Air Resources Management
Bureau of Air Quality
Pennsylvania Department of Environmental Protection
P.O. Box 8468
Harrisburg, PA 17105-8468

RE: PADEP- Various Ozone Transport Region Measures under Consideration by the Ozone Transport Commission (OTC) and the Mid-Atlantic/Northeast Visibility Union; Public Meetings; NPCA Comments

Dear Mr. Havens:

At the June 6-7, 2006 OTC meeting, the OTC Commissioners are scheduled to vote on a number of action items and recommendations for additional programs to be considered by the Ozone Transport Region (OTR) jurisdictions for implementation to reduce ground-level ozone and its precursors.

It is NPCA's understanding that based on OTC's March 29, 2006 Summary of Candidate Control Strategy –with regard's to Architectural and Industrial Maintenance (AIM) coatings – OTC is to move ahead with AIM Phase II reduction planning in parallel with what the California Air Resources Board (CARB) does with its AIM Suggested Control Measure (SCM) in 2007. Industry supports this approach. It will allow a "more" uniform rule to be adopted by both the east and west coasts. One major advantage for this is that CARB and many of the OTC states [as well as industry] are skeptical of the technical feasibility of many of the South Coast Air Quality Management District (SCAQMD) Rule 1113 limits.

NPCA would like to provide the following comments to Pennsylvania – which are consistent with the attached NPCA comment letter to OTC dated January 24, 2006, where NPCA suggested the following:

- The current OTC AIM rule was just implemented, more time is needed to assess any performance issues resulting from this rule.
- In 2006, CARB will complete several important projects that will directly benefit OTC – CARB will complete its 2005 AIM Survey which will provide needed information on the availability of coatings compliant with a variety of possible rule limits. CARB will also complete its work on an alternative to Method 24 – since this method does not work well at limits of 100 grams per liter and less.
- Therefore, if OTC does move forward with revisions to its AIM rule - NPCA believes that OTC should wait for and/or work in cooperation with CARB as it revises its SCM later this year.

If you have any questions or need further information, please do not hesitate to contact me at 202-462-6272.

Sincerely,

/s/

David Darling, P.E.
Director, Environmental Affairs

Cc:

Christopher Recchia, OTC

**** Sent electronically and in hard copy ****