

August 1, 2005

Michael Koerber
Executive Director
Midwest Regional Planning Organization (MRPO)
2250 East Devon Avenue, Suite 250
Des Plaines, Illinois 60018

RE: Comments on Architectural and Industrial Maintenance (AIM) and Industrial Surface Coatings

Dear Mr. Koerber:

The National Paint and Coatings Association (NPCA) is submitting comments on MRPO's Architectural and Industrial Maintenance (AIM) and Industrial Surface Coatings "white papers" as well as presentation material from the June 28 -29, 2005 Regional Air Quality Regional Workshop.

NPCA is a voluntary, non-profit industry association originally organized in 1888 and comprised today of over 350 member companies who manufacture consumer paint products and industrial coatings, and the raw materials used in their manufacture. NPCA membership companies collectively produce some 90% of the total dollar volume of architectural paints and industrial coatings produced in the United States. As the preeminent organization representing the paint and 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.

AIM Coatings Presentation - Accuracy of the Emission Estimates

NPCA has serious concerns with regards to the accuracy of MRPO emission estimates in the June 29, 2005 presentation entitled "Candidate Control Measures for Architectural and Industrial Maintenance (AIM) Coatings". Specifically slide #3 "VOC Emissions by AIM Category" and Slide #10 "VOC Emissions for AIM Coating Candidate Control Measures" – these slides do not make sense – states with highest population should have the highest VOC emissions from AIM coatings. Both slides indicate that VOC Emissions from AIM coatings are greatest in OH, followed by IL, MI, IN and WI respectively. On the contrary, one would expect that VOC emissions should be the highest for the state with the highest population - IL, followed by OH, MI, IN and WI respectively, since AIM voc emissions are primarily driven by population.

White Paper - Out-of- Date References

NPCA supports the comment in the Regional Air Quality Regional Workshop summary, that several of the references in the white papers were out-of-date. NPCA suggests that MRPO update the references for the AIM white paper, and make any necessary changes as a result of these changes.

Candidate Control Measures: AIM Coatings

NPCA is very concerned with MRPO's Candidate Measure SOLV1A – *Adoption of More Stringent VOC Content Limits for AIM Coatings based on OTC Model Rule*, and very concerned with Candidate Measure SOLV1B – *Adoption of South Coast Air Quality Management District (SCAQMD) Phase III VOC Emission Limits*.

NPCA strongly suggests that MRPO not adopt limits from OTC, CARB SCM or the SCAQMD and would be happy to provide detailed comments accordingly, however based just on the adoption cost of SOLV1A or SOLV1B, NPCA strongly suggests that MRPO instead adopt other more cost effective control measures. As noted in Table 1 of the AIM Interim white paper - SOLV1A will cost \$ 6,400 per ton, and SOLV1B \$20,000 per ton to implement respectively. Given that AIM Coatings account for only 3.7% of the VOC emissions in the MRPO region, other categories offer much greater cost effective reductions – these include non-road vehicles, highway vehicles, industrial processes and residual fuels which combined, account for nearly 50% of the VOC emission in the MRPO region.

Finally, with regards to Measure SOLV1C (Reactivity), reactivity is of interest to NPCA, although additional information and dialogue is needed.

NPCA is pleased to submit these comments on the white papers and presentation material from the June 28 -29, 2005 Regional Air Quality Regional Workshop. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

/s/

David F. Darling, P.E.

Director, Environmental Affairs