



AmericanCoatings
ASSOCIATION

Aug 26, 2011

To: OTC Stationary and Area Source Committee
From: ACA Automotive Refinish Coalition

RE: State-by-State Implementation Time-line for Automotive Refinish Rule

The American Coatings Association Automotive Refinish Coalition would like to submit a question in advance of the Sept 8, 2011 meeting with the hope that it can be answered during the actual stakeholder Q/A period.

We respectfully request that the OTC Stationary and Area Source Committee provide clarity on the State-by-State implementation time-line for the automotive refinish regulation. This is of paramount importance because of the logistical challenges that would arise if all of the 11 states (with no current activity) were to implement the rule at the same time. The industry needs sufficient time to provide outreach to thousands of shops and has only limited resources (according to Figure 1, in 2009 there were 11,840 shops in the OTC). We urge the states to stagger implementation, though making sure that they are not unduly delayed. Based on our knowledge of how individual states promulgate rules, what stage they are at and the total number of shops, Figure 2 provides suggested batches and dates for OTC to follow. DC and VA would implement the rule along with MD starting in mid-2013. New England states mid-year 2014. And lastly NY, NJ, and PA mid-2015 (DE has indicated its target as Jan 1, 2012). We hope that you will find our information helpful and look forward to your response.

Sincerely,

John Hopewell
Asst. Director, Environmental Affairs

Figure 1

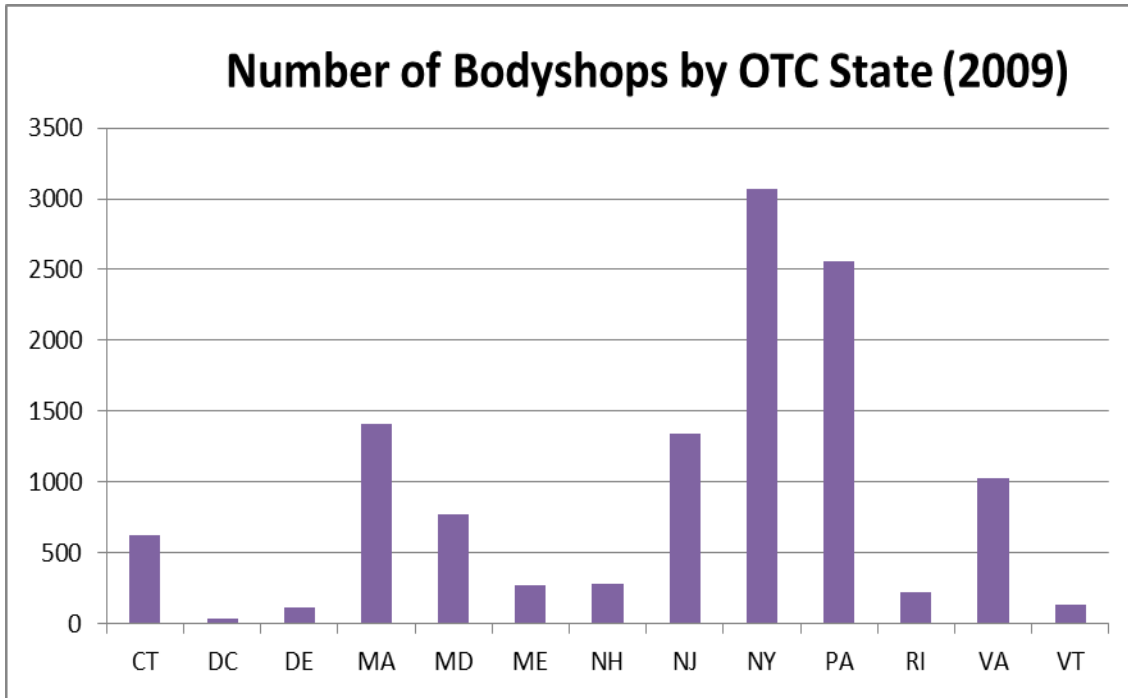


Figure 2

