
From: Shivetts, Mary Ellen [shivetts@ppg.com]
Sent: Wednesday, December 21, 2011 8:31 AM
To: Paint Product Stewardship; Dunn, Cynthia
Subject: PPG CalRecycle Response
Attachments: CalRecycle12_21_11.docx

Please find PPG's Comment Letter on CA Revised Regulations attached to this email.

Thank you ,

Mary Ellen Shivetts

Product Stewardship, Regulatory Affairs, and Labeling Manager | USCA

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December 22, 2011

Ms. Carol Mortensen, Director
California Department of Resources,
Recycling and Recovery
801 K Street, MS 19-01
Sacramento, CA 95814

RE: Revised Proposed Regulations for Architectural Paint Recovery Program: 2nd 15-
Day Comment Period

Dear Ms. Mortensen:

PPG Industries, Inc. (PPG) is submitting comments on the above referenced California Department of Resources, Recycling and Recovery (CalRecycle) Regulations for Architectural Paint Recovery Program (herein after referred to as “Proposed Regulations” or “Revised Proposed Regulations”). PPG is a leading supplier of coatings and specialty products and services, serving customers in construction, consumer products, industrial and transportation markets and aftermarkets.

PPG supports the comments submitted by the American Coatings Association (ACA) and PaintCare. The Proposed Regulations go well beyond the scope of CalRecycle’s statutory authority and the revisions made through the first two rounds of comments do not correct this. We sincerely appreciate your efforts to work with ACA and PaintCare to craft compromise language to address our concerns, and we are pleased with the progress made to date. However, two fundamental issues remain: 1). the additional mandatory requirements for the Annual Report, and 2). the lack of any notice and comment procedures for the administrative fees charged by the Department. As these issues have not been appropriately addressed, we will not be able to support the latest revisions.

PPG hopes that these last remaining issues can be resolved and the industry can bring the PaintCare program to California in a timely fashion. Thus, PPG once again urges CalRecycle to revise the regulations in keeping with the underlying statute and the intent of AB 1343, pursuant to ACA and PaintCare comments in this regard.

Sincerely,



Mary Ellen Shivetts
Product Stewardship Manager – PPG Architectural Coating