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## Rule 215, Architectural Coatings

1 message

David Darling &lt;ddarling@paint.org&gt;

Wed, Aug 5, 2020 at 6:27 AM

To: Rania Serieh &lt;rania.serieh@edcgov.us&gt;, Dave Johnston &lt;dave.johnston@edcgov.us&gt;

Dave and Rania – it was a pleasure speaking with you yesterday, just a few comments:

### Definitions of eliminated/adsorbed categories

We suggest that when coatings categories are eliminated or adsorbed into another category, that the definition not be removed from the rule. Having the former definition is still valuable to industry, so that they don't have to reference older rules to obtain the definitions.

As an example – the Wood Coating category definition includes sanding sealers, varnishes and lacquers, however these terms will no longer be defined in the rule if the proposal is finalized as written. ACA suggests not deleting definitions from the rule – especially definitions for sanding sealers, varnishes and lacquers.

### 2019 SCM

Also as we discussed, if El Dorado does adopt the 2019 SCM in the future, please include a one year compliance date, 3 year sell through and please retain the small container exemption.

Best regards,

David Darling, P.E.

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