



**AmericanCoatings**  
ASSOCIATION

December 12, 2014

Doug Szenher  
POA Division  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118

**RE: DMC and AMP VOC Exemption; ACA Comments**

Dear Mr. Szenher:

The American Coatings Association (ACA) requests Arkansas to exempt Dimethyl Carbonate and 2-Amino-2-methyl-1-propanol (AMP) as a Volatile Organic Compound (VOC).

The American Coatings Association (ACA) is a voluntary, nonprofit trade association working to advance the needs of the paint and coatings industry and the professionals who work in it. The organization represents approximately 350 paint and coatings manufacturers, raw materials suppliers, distributors, and technical professionals.

The coatings industry is under constant pressure to reformulate products to lower and lower VOC content. As a result there is a critical and urgent need for safe, effective and affordable exempt solvents and coating formulators need all available tools to formulate both lower VOC and reactivity coatings. DMC and AMP could prove useful for coatings formulations.

If exempted, there may be an incentive for industry to use these negligibly reactive compounds in place of more highly reactive compounds that are regulated as VOCs. As such, ACA requests exempting DMC and AMP as a VOC.

Finally, in order to minimize the need to conduct a formal rulemaking each time EPA exempts a VOC compound, ACA suggests Arkansas including a direct reference the EPA Exempt VOC Compound List at 40 CFR 51.100(s)(1).

In advance, thank you for your consideration of our request. Please do not hesitate to contact me for additional information or if you have questions.

Sincerely,

/s/

David Darling, P.E.  
Senior Director, Environmental Affairs

*\*\* Sent via email \*\**