



**AmericanCoatings**  
ASSOCIATION<sup>SM</sup>

March 2, 2020

Attention: Mr. Kenneth Zarker  
Director  
Hazardous Waste and Toxics Reduction Program  
Washington State Department of Ecology  
300 Desmond Dr SE, Lacey  
PO Box 47600  
Olympia, WA 98504-7600

**RE: Priority Consumer Products Draft Report to the Legislature; Safer Products for Washington Implementation Phase 2; ACA Comments**

Dear Mr. Zarker:

The American Coatings Association (ACA)<sup>1</sup> submits the following comments on the Priority Consumer Products Draft Report to the Legislature; Safer Products for Washington Implementation Phase 2 Report.

Please note that ACA supports the comments submitted by the Color Pigments Manufacturers Association.

**Paint Colorant Reference (Page 24, second paragraph)** - The Priority Consumer Products Report focuses on Printing Inks and as such ACA suggests that the paint colorant language on page 24, second paragraph be deleted from the report since paint colorants are not printing inks and this language has no relevance to the report.

**Legacy PCBs** - ACA does not support the statement that “Printing inks are a significant source of inadvertently generated PCBs” given that the Washington State Department of Ecology documents that 97.0 % of PCB’s in Washington State waterways are caused by legacy products that were never banned or removed when the Federal government implemented its ban on commercial manufacturing of products using PCBs as a raw material. Commercial products that used PCBs as a raw material are still present in commerce (industrial electric transformers) should be the focus of Ecology’s efforts.

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<sup>1</sup> 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 paint and coatings manufacturers, raw materials suppliers, distributors, and technical professionals. ACA serves as an advocate and ally for members on legislative, regulatory, and judicial issues, and provides forums for the advancement and promotion of the industry through educational and professional development services.

**PCB-11**- It should be noted in the draft report that Washington State laws, regulations and policy initiatives on the topic of PCBs are inconsistent with North American (USA, Canada, Mexico) and Global Regions' laws and regulations. PCB-11, the subject of focus by Washington State government agencies, is not considered a PCB by any global government other than the USA. Global and North American regulatory standards for inadvertent PCBs have been confirmed as meeting health and safety requirements for all population. In addition, it is very important to note that Washington State water quality studies, have consistently determined that PCB-11 does not bioaccumulate in salmon.

Thank you for your consideration of our concerns. Please do not hesitate to contact me if you have any questions.

Sincerely,

/s/

David Darling

Vice President, Health, Safety and Environmental Affairs