



July 21, 2020

Meredith Williams, Ph.D.
Director
Department of Toxic Substances Control
California Environmental Protection Agency
1001 I Street
Sacramento, California 95812-0806

Dear Director Williams,

On June 30, 2020, the Department of Toxic Substances Control (DTSC) issued a Notice of Deficiency (NOD) on the American Chemistry Council's Spray Foam Coalition (SFC) Abridged Alternatives (AA) Analysis Report on Two-component Low- and High-pressure Spray Polyurethane Foam (SPF) Systems Containing Unreacted Methylene Diphenyl Diisocyanate (MDI). General Coatings Manufacturing Corp. is a member of the SFC's consortium that is responding to the listing of SPF Systems with unreacted MDI as a priority product under the California Safer Consumer Product regulations.

General Coatings Manufacturing Corp. is aware DTSC has granted a 45-day extension and respectfully requests DTSC grant the full 90-day extension requested by SFC for the submission of a revised AA report in response to the NOD. The original due date for the revised AA report is August 31, 2020. This 90-day extension request would extend the due date to November 29, 2020.

General Coatings Manufacturing Corp. is requesting DTSC grant the full 90-day extension to provide the necessary time to review, interpret, and respond to 95 new and discrete comments provided by DTSC in the NOD. The SFC's consortium Abridged AA report is the first Abridged AA report or final AA report submitted under the SCP regulations. Accordingly, because there is no template or existing Abridged AA report to use as a guide, General Coatings Manufacturing Corp. could not have reasonably anticipated the extensive set of comments issued in the NOD. Further, the NOD included extended, detailed, comments that we have not seen before and expand far beyond the public comments the consortium received in the Notice of Comment (NOC), when DTSC provided 120 days to develop a revised AA report.

COVID-19 has significantly impacted how General Coatings Manufacturing Corp. conducts business. General Coatings Manufacturing Corp. has complied with State of California and County of Fresno intermittent requirements for Stay at Home for all employees, Workforce staff limits allowed at our

Fresno Manufacturing facility, temporary General Coatings Manufacturing Corp. staff task / job re-allocations due to not enough employees on site, uncertainty and reduction in Fresno operations awaiting clarity on our business classification as essential, Travel restrictions impacting corporate staff to support Fresno manufacturing facility to address DTSC data generation and submittals, and reduction in regional California sales impacting Fresno business operations necessitating filing for PPP loans.

The continued persistence of COVID-19, extended social distance requirements, and business impacts could not have been reasonably anticipated or controlled by us. This request for an additional 90-days to respond to the NOD aligns with CalEPA's statement on Compliance with Regulatory Requirements During the COVID-19 Emergency, which states "CalEPA also recognizes that some regulated entities may need additional compliance assistance as a result of the COVID-19 pandemic. Specific time-delimited remedies, such as the extension of deadlines, may be warranted under clearly articulated circumstances."

Finally, General Coatings Manufacturing Corp. supports SFC meeting with DTSC to ensure the consortium can adequately respond to DTSC's comments. We anticipate that several meetings will need to take place and that the current timeframe – even with the 45-day extension – does not provide sufficient time to accommodate collaboration.

My contact information is available in Appendix 1. The responsible entities priority products are high- and low-pressure two component SPF systems, which contain unreacted MDI. Detailed priority product information, including brands, is included in Appendix 2.

Please contact me at eric@generalcoatings.net with any questions regarding this 90-day extension request.

Sincerely,

Eric Montie
General Manager

Appendix 1 – Contact Information

First Name	Eric
Last Name	Montie
Company	General Coatings Manufacturing Corp.
Business Type	Manufacturer
Email	eric@generalcoatings.net
Phone	559-495-4004
Website	generalcoatings.net
Address	1220 E. North Ave. Fresno, CA. 93725

1220 E. North Avenue • Fresno, CA 93725
Tel: (559) 495-4004 • Toll Free: (855) 495-GCMC • Fax: (559) 495-4009
www.generalcoatings.net

Appendix 2 – Priority Product Information

Manufacturer Name	Product Name
• General Coatings Manufacturing Corp.	• Ultra-Thane 050 with unreacted Methylene diphenyl isocyanate
• General Coatings Manufacturing Corp.	• Ultra-Thane 050 OCX with unreacted Methylene diphenyl isocyanate
• General Coatings Manufacturing Corp.	• Ultra-Thane 230-2.5, 2.7, and 3.0. with unreacted Methylene diphenyl isocyanate
• General Coatings Manufacturing Corp.	• Ultra-Thane 170 with unreacted Methylene diphenyl isocyanate
• Universal Polymers Corp.	• UPC 2.0 with unreacted Methylene diphenyl isocyanate
• Universal Polymers Corp.	• UPC 500 with unreacted Methylene diphenyl isocyanate
• Universal Polymers Corp.	• UPC 500 OCX with unreacted Methylene diphenyl isocyanate
• Brand A Roofing	• Product 1, 2.5 with unreacted Methylene diphenyl isocyanate
• Brand A Roofing	• Product 2, 2.7 with unreacted Methylene diphenyl isocyanate
• Brand A Roofing	• Product 3, 3.0 with unreacted Methylene diphenyl isocyanate
• Brand B Roofing	• Product 1, 2.5 with unreacted Methylene diphenyl isocyanate
• Brand B Roofing	• Product 2, 2.7 with unreacted Methylene diphenyl isocyanate
• Brand B Roofing	• Product 3, 3.0 with unreacted Methylene diphenyl isocyanate