



SAU/SEA

swimming pool products, inc.

MANUFACTURER OF SWIMMING POOL ENAMELS AND RELATED SPECIAL PRODUCTS

1855 HIGHWAY #206 • SOUTHAMPTON, NEW JERSEY 08088

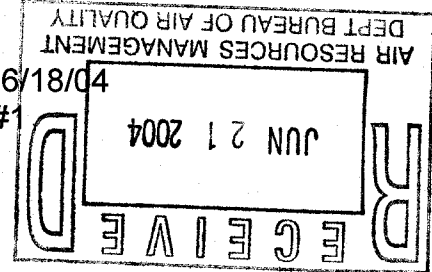
Phone (609) 859-8500 • Fax (609) 859-1500

www.sausea.com



To: Mr. Terry Black, Chief of Regulations
Pennsylvania Department of the Environment
Division of Air Quality Management
PO Box 8468, 400 Market Street
Harrisburg, Pennsylvania 17105-8468

Date: 6/18/04
Page #1



**Re: Ozone Transport Commission/ VOC Regs - AIM Rule
Application for Pennsylvania Variance under § 130.606 -
Addendum to Application of 5/27/04**

Dear Mr. Black:

It was a pleasure speaking with you on the phone this morning. In response to your Pennsylvania request, we have included a revised copy of our "R & D Plan for Compliance with Pennsylvania §130.603" which includes the addition of the coating I erroneously omitted (POOLSEAL Rubber Base Pool Paint) in our original application of 5/27/04.

Thank you, sincerely, for advising me of this error. We do understand that this revision will restart the application process as of this date.

We look forward to hearing from you further.

Sincerely,

Sau-Sea Swimming Pool Products, Inc.

Suzanne H. Smallwood

encl. R & D Plan for Compliance - rev.

Schedule - cc: file-VOC Reg

MEMBER





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SAU-SEA R & D Plan for Compliance with Pennsylvania §130.603:

New SAUSEA Enamel R -VOC/OTC 340 g/l Rubber Base Swimming Pool Paint
New SAUSEA Plaster Sealer -VOC/OTC 340 g/l Rubberized Swimming Pool Paint
New SAUSEA Enamel PV - VOC/OTC 340 g/l Vinyl Base Swimming Pool Paint
New SAUSEA Enamel E - VOC/OTC 340 g/l Epoxy Base Swimming Pool Paint
New POOL SEAL Rubber Base Pool Paint - Commercial Grade Rubber Pool Paint

- 1) Primary (Current) Phase:** Research and selection of the following paint components in order to find those that would offer the lowest VOC levels and at the same time not sacrifice their intended purpose in a swimming pool paint coating. The components to be researched (singularly and combined) are: resins, pigments, plasticizers, solvents, diluents, thixotropic and other additives, pigment extenders, surfactants - all of numerous grades, types, viscosities, etc. We are currently in this phase and, as you can imagine, the various combinations are enormous. Further, this research involves lengthy consultation with many suppliers and also outside lab work (because of our limited lab facilities) - forcing us to rely on their lab timetables/schedules, all time-consuming as well. **Estimated date of completion: Not later than 12/05.**
- 2) Second Phase :** After development of satisfactory laboratory formulations for the above coatings, we require a 3-6 month time frame for the in-house (factory production) of the newly formulated voc-compliant coatings. During this time, we determine the feasibility and costs factors of mass production. This phase also addresses any production "glitches" we encounter and may result in some laboratory re-formulating, as well. Successful formulations are then "shelved" to determine long-term storage effects (i.e., in-can corrosion, coating stability, settling, etc.). Simultaneously, the coating formulations are processed to the next phase. **Estimated date of completion: Not later than 6/06 for production adjustments and 12/07 for storage stability tests.**
- 3) Third Phase:** After the coating(s) have passed in-plant reformulation successfully, they are moved to field-testing. The coating formulations are put "in-service" on "test" swimming pools and monitored, over a two year period for performance under submersion in the chemically treated pool environment. Meanwhile, some portion of the test coating(s) on each pool are monitored to determine the actual service life, before recoating is necessary, while other portions of the test coating(s) are recoated after 1 year and then observed for intercoat adhesion (critical in the success of a submerged swimming pool paint) over a period of several years and/or recoats. **Estimated date of Compliance: Not later than 12/31/07.**

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Normally, the successful development of a new swimming coating takes approximately 3 years, moving through the phases outlined above. We are confident of our results to date and believe that we will be able to market our new compliant formulations within the next 24-36 months.

6-18-04 Rev.