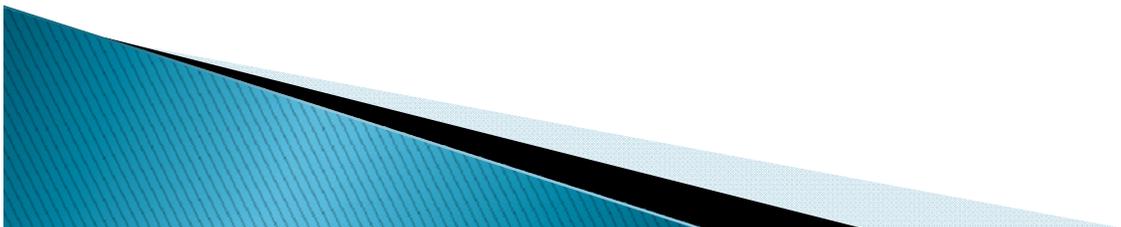


# Preliminary Compound Exclusion Concept

ACA Comments

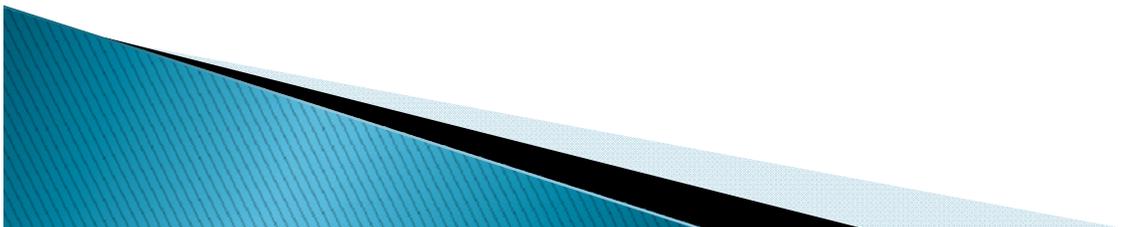
# Film Extraction

- ▶ Too complicated
- ▶ Not accurate
- ▶ Associated errors could result in compound be treated as a VOC
- ▶ Film extraction procedure seems only appropriate for latex architectural coatings
- ▶ However Rule 1113 includes many other types of coatings
- ▶ Method 313 is intended for other coatings rules
- ▶ Suggest Pentaethylene Glycol instead of Dibutyl Phthalate



# TGA or Method 24

- ▶ ACA suggests using either TGA or Method 24 as second step as opposed to film extraction
- ▶ ACA is open to lower temperatures which are more representative of AIM coatings applications
- ▶ Correlate better to District's ambient solvent evaporation results
- ▶ Rule 1144
- ▶ Utilize fully formulated coating and/or resin



# Method 313

- ▶ ACA requests SCAQMD include precision statements in Method 313
- ▶ Users can then complete confidence limit calculations

