ADVISORY NOTICE

Rule 1113: Section (b) Paragraph (69); Section (c) Paragraph (1)(A)

Original Review: December 2001

Revised Date: October 2013

Subject: Specification of VOC Content of Colorants

Issue:
The South Coast Air Quality Management District has been made aware of an uncertainty in the VOC calculation of coatings in regards to the exemption of colorants added to tint base as a part of manufacturing versus at the point of sale (e.g. retail store).

Current Rule Language:
Rule 1113 section (b)(69) defines a tint base as “an architectural coating to which colorants are added.”

Section (c)(1)(A) states “…no person shall supply, sell, offer for sale, market, manufacture, blend, repackage, apply, store at a worksite, or solicit the application of any architectural coating within the District: that is listed in the Table of Standards 1 and contains VOC (excluding any colorant added to tint bases) in excess of the corresponding VOC limit specified in the table, after the effective date specified.”

Analysis:
At the point of manufacture any colorant added is considered part of the overall VOC content of the coating. Once the product reaches the retail or wholesale market, any colorant added at that point would not be considered as part of the total VOC of the product. However, additional colorants are subject to their own VOC limits.

Effective January 1, 2014, colorant added at the point of sale (POS) will have to meet the following VOC limits:

<table>
<thead>
<tr>
<th>COLORANT ADDED TO</th>
<th>Limit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Architectural Coatings, excluding IM Coatings</td>
<td>50</td>
</tr>
<tr>
<td>Solvent-Based IM</td>
<td>600</td>
</tr>
<tr>
<td>Waterborne IM</td>
<td>50</td>
</tr>
</tbody>
</table>

The POS includes retail outlets that add colorant to a coating container to obtain a specific color. Colorant added at the factory or at the worksite is not subject to the VOC limit. In addition, containers of colorant sold at the POS for use in the field or on a job site are also not subject to the VOC limit on colorants.

Comments or questions regarding Rule 1113 should be directed to areasources@aqmd.gov or to Heather Farr, Air Quality Specialist at (909) 396-3672.