

# ADVISORY NOTICE

**Rule 1113:** Section (b) Paragraph (32)  
**Original Review:** February 2008  
**Revised Date:** November 2013  
**Subject:** Low- Solids Category and VOC Limit

**Issue:**

The South Coast Air Quality Management District has been made aware of an uncertainty regarding the low-solids category and the VOC limit/calculations.

**Current Rule Language:**

Rule 1113 section (b)(32) defines low-solids coatings as “coatings containing one pound or less of solids per gallon of material.”

As listed in the [Table of Standards 1](#), the limit for low-solids coatings is 120 grams of VOC per liter of material.

**Analysis:**

Low-solids coatings contain a small amount of solids, a large amount of water, and some solvent. This creates an artificially high value when the grams of VOC per liter of coating, less water and exempt compounds, is calculated. As a result, the low-solids coating is the only category where VOC compliance is determined by grams of VOC per liter of material, as supported by the USEPA. The VOC limits for the remaining coating categories are determined by grams of VOC per liter of coating, less water and exempt compounds.

**Conclusion:**

Any coating category, such as a stain or a waterproofing sealer, which contains one pound or less of solid, is subject to the VOC limit of 120 g/L of material. Therefore, potentially any coating category can be considered a low-solids coating given the quantity of solids in the coating per gallon of material.

See the following online link for a discussion on the VOC of coating versus the VOC of material: <http://www.aqmd.gov/home/regulations/compliance/vocs>.

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