



ADVISORY NOTICE

Rule 1113: Section (b) Paragraph (35)
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)(35) 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 US-EPA. 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 or call the Area Source team at 909-396-2390.