ADVISORY NOTICE

Rule 1113:  Section (d) Paragraph (2) and (3)(A)

Original Review:  March 2006

Revised Date:  March 2018

Subject:  Specification of VOC Limitations for Thinning Practices

Issue:
The South Coast Air Quality Management District has been made aware of an uncertainty in the allowable VOC limitations for the thinning of coatings.

Current Rule Language:
Rule 1113 section (d)(2) states “…containers for all coatings subject to the requirements of this rule shall carry a statement of the manufacturer's recommendation regarding thinning of the coating. This requirement shall not apply to the thinning of architectural coatings with water. The recommendation shall specify that the coating is to be employed without thinning or diluting under normal environmental and application conditions, unless any thinning recommended on the label for normal environmental and application conditions do not cause a coating to exceed its applicable standard.

Rule 1113 section (d)(3)(A) states “…For coatings or colorants packaged in a single container, the VOC per liter of coating (less water and less exempt compounds, and excluding any colorant added to the tint base) as supplied, after any recommended thinning…”

Analysis:
Rule 1113 section (d)(2) and (d)(3)(A) specifies that coating can only be thinned as recommended by the manufacturer, and if thinned, it does not cause a coating to exceed its applicable VOC limit. The container of any coating subject to Rule 1113 shall display the maximum VOC content of the coating, as supplied, and after any thinning as recommended by the manufacturer.

Conclusion:
Once a coating has been thinned, the VOC limit shall not exceed the allowable limit in the Table of Standards of the rule.

Furthermore, manufacturers shall also refer to the VOC limits and requirements in Rule 1143 – Consumer Paint Thinners and Multi-Purpose Solvents.

Comments or questions regarding Rule 1113 should be directed to areasources@aqmd.gov or call the Area Source team at 909-396-2390.