

**PROPOSED AMENDED RULE
1106 - MARINE AND PLEASURE
CRAFT COATINGS**

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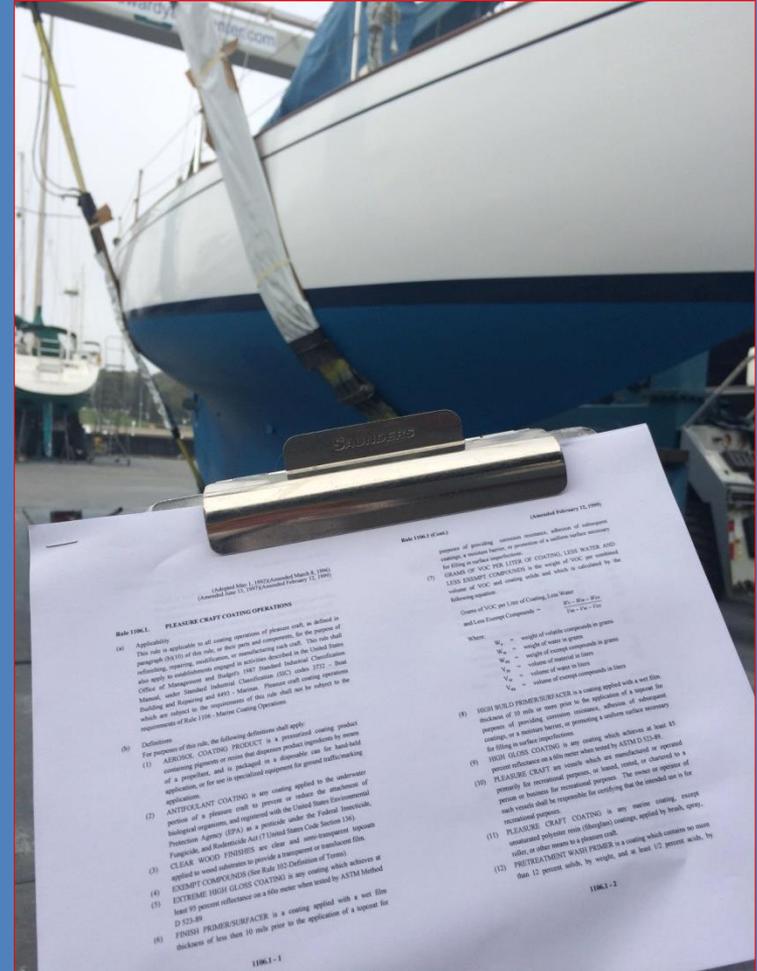
**PROPOSED RESCINDING OF
RULE 1106.1 - PLEASURE CRAFT
COATING OPERATIONS**

PUBLIC WORKSHOP

February 12, 2019

OUTLINE

- Purpose
- Proposal
- Updates
- Other Impacts
- Rulemaking Schedule



PURPOSE

- Rulemaking previously conducted
 - Continuing from October 2, 2015 Public Hearing
- Meet U.S. EPA RACT requirements
- Enhance Compliance
 - Observed non-compliant products (with VOC requirements) in use and on retail shelves
- Clarification & updates consistent with more recent Regulation XI coating rules



PROPOSAL

□ Enhance Rule Effectiveness:

- Subsume Rule 1106.1 into Rule 1106 - Marine Coating Operations
- Rescind Rule 1106.1 - Pleasure Craft Coating Operations
- Format VOC limits into three Tables of Standards, one for Marine, one for Pleasure Craft, and one for Low Solids categories
{PAR1106 paragraphs (d)(1), (d)(2) & (d)(3)}
- Remove obsolete rule language
 - Out of date rule language not necessary

□ Enhance Enforceability:

- Add prohibitions for possession, specification and sales rule language {PAR1106 subdivision (e)}
- New “most restrictive” VOC limit rule language
{PAR1106 paragraph (d)(4)}

PROPOSAL (CONT)

□ Other:

- Align VOC limits with U.S. EPA CTG and other CA APCDs / AQMDs
{PAR1106 paragraphs (d)(1), (d)(2) & (d)(3)}
- Add application equipment transfer efficiency requirements
{PAR1106 subparagraphs (d)(9)(A) & (d)(9)(B)}
- Amend touch-up definition and exemption
{PAR1106 paragraphs (c)(41) & (j)(3)}
- Add Purpose subdivision to Proposed Amended Rule 1106 {PAR1106 subdivision (a)}
- Make Updates and Editorial Corrections as necessary

UPDATES

- **Received comments during and after Working Group Meeting #1 (January 16, 2019)**
 - No nonskid coating category in Table of Standards for Pleasure Craft Coatings
 - Falls under Any Other Coating Type (limit is 420 g/L VOC) {PAR 1106 paragraph (d)(2)}
 - Request for exemption for UV/EB/LED-cure materials
 - Staff proposes to add an exemption from PAR 1106 provisions for marine and pleasure craft coatings containing <10 g/L VOC {PAR 1106 paragraph (j)(1)}
 - Request to include ASTM D7767-11 in subdivision (h) Test Methods
 - SCAQMD laboratory determined ASTM D7767-11 is not an appropriate test method for VOC determination of thin-film energy curable products
 - Request time for rule implementation for labeling requirements for Marine and Pleasure Craft Coating manufacturers {PAR 1106 subdivision (g)}
 - Labeling of VOC content is not a new requirement and has been required since December 5, 1986 per Rule 443.1 – Labeling of Materials Containing Organic Solvents

OTHER IMPACTS

- **CEQA analysis**
 - Revised Final Environmental Assessment to be included in May 3, 2019 Governing Board package
- **Socioeconomic analysis**
 - Impacts expected to be negligible



RULEMAKING SCHEDULE

- Public Workshop February 12, 2019**
 - **Please submit comments by February 26, 2019**

- SSC March 15, 2019**

- Set Hearing April 5, 2019**

- Public Hearing May 3, 2019**



COMMENTS & QUESTIONS

For more information, questions, or comments:

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