



**PROPOSED AMENDED RULE
1106 – MARINE AND
PLEASURE CRAFT COATINGS** **&** **PROPOSED RESCINDING OF
RULE 1106.1 – PLEASURE
CRAFT COATING OPERATIONS**
WORKING GROUP MEETING #2
MARCH 12, 2019



AGENDA



Summary of Staff Activities and Updates



New Revisions to Proposed Rule Language



Key Issues



Remaining Rule Schedule



Open Forum

SUMMARY OF STAFF ACTIVITIES

Working Group Meeting #1 on January 16, 2019

- Staff asked to consider potential exemptions to incentivize low VOC coatings
- Concerns expressed with test methods and labeling requirements

Public Workshop on February 12, 2019

- Staff proposed exemption for coatings less than 10 g/L VOC
- One stakeholder asked that the proposed exemption be 50 g/L VOC
- Same stakeholder asked staff to consider ASTM D7767-11 as VOC test method for energy-cure coatings

Working Group Meeting #2 on March 12, 2019

- Staff has posted draft rule language to SCAQMD website
 - Draft rule language updated to include latest revisions

OTHER UPDATES

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- Draft Staff Report to be made available after Working Group Meeting #2
- Revised Final Environmental Assessment to be included in Governing Board Package

NEW REVISIONS TO PROPOSED RULE LANGUAGE

New revision to proposed rule language for subdivision (b) – “Applicability”

- New proposed rule language will enhance clarity to whom PAR1106 is applicable to
- Revision is as follows:
 - “This rule is applicable to any person who supplies, sells, offers for sale, markets, manufactures, blends, packages, repackages, possesses or distributes any Marine or Pleasure Craft Coating and any associated solvent used with a Marine or Pleasure Craft Coating for use within the SCAQMD Jurisdiction, as well as any person who applies, stores at a worksite, or solicits the application of any Marine or Pleasure Craft Coating and any associated solvent used with a Marine or Pleasure Craft Coating within the SCAQMD Jurisdiction.”

NEW REVISIONS TO PROPOSED RULE LANGUAGE (CONT.)

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New revisions to the proposed rule language for subdivision (f) – “Recordkeeping Requirements”

- New revised proposed rule language will retain existing VOC recordkeeping requirements per Rule 109
- Additional recordkeeping requirements (i.e. emission control system) have been removed

Removal of proposed subdivision for “Administrative Requirements for Marine and Pleasure Craft Coating Manufacturers”

- VOC labeling already required by Rule 443.1 for containers with a capacity of one quart (0.94 liter) or larger

KEY ISSUE #1

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ENERGY CURABLE COATINGS:

REQUEST FOR EXEMPTION FOR COATINGS LESS THAN 50 G/L VOC

Staff Proposal:

Exemption for coatings that have a VOC content of no more than 10 g/L



An exemption for coatings with less than 10 g/L is included in Rule 1130 – Graphic Arts



Less than 10 g/L of VOC exemption is consistent with SCAQMD super-compliant status (e.g. Rule 1113 – Architectural Coatings)

Staff is interested in seeing energy curable coatings demonstrated in marine and pleasure craft coating applications and has not encountered such products available for use

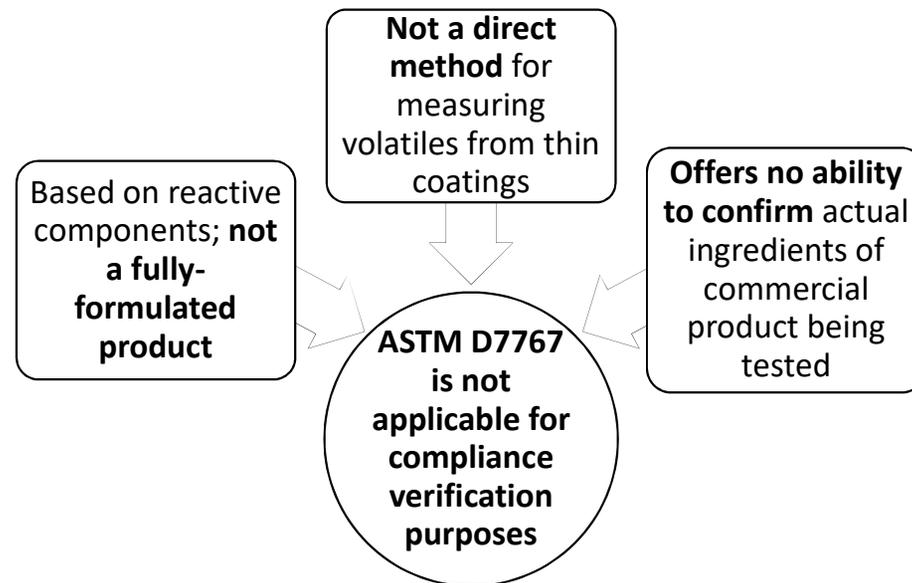
KEY ISSUE #2

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ENERGY CURABLE COATINGS:

REQUEST TO INCLUDE ASTM D7767 IN SUBDIVISION (H) TEST METHODS

- There is **no direct method** for measuring VOC from thin coatings; ASTM D7767 just provides **an estimation** of VOC
 - ASTM D7767 developed to help formulators identify and select lower VOC constituents during production
- SCAQMD Laboratory staff met with ASTM D7767 developer (3M, Minneapolis, MN) and confirmed that the method is not applicable for compliance verification purposes



REMAINING RULE SCHEDULE

- **Stationary Source Committee..... 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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