1106 - MARINE COATING OPERATIONS & 1106.1 - PLEASURE CRAFT COATING OPERATIONS
WORKING GROUP MEETING

January 16, 2019
AGENDA

- Goals
- Purpose
- Proposal
- Other Impacts
- Tentative Schedule
PURPOSE

☐ Meet RACM/RACT requirements
  – Align VOC limits in Rules 1106 with U.S. EPA Control Techniques Guidelines
  – Align VOC limits in Rules 1106 & 1106.1 with other CA APCDs/AQMDs

☐ Enhance Compliance Reviews
  – Observed non-compliance with products in use and on retail shelves

☐ Meet BARCT requirements
  – Add spray gun transfer efficiency requirements

☐ Clarification & Consistency Updates
PROPOSED AMENDMENT GOALS

☐ Enhance rule effectiveness
  – Last amendment – January 1995
  – Update rule with requirements consistent with other Regulation XI rules (e.g. VOC labeling)
  – Remove ‘out of date’ rule language

☐ Enhance enforceability
  – New prohibition of possession, specification & sales
  – Restrict sales of non-compliant coatings from being distributed to commercial and consumer outlets
  – Require removal of non-compliant coatings from commercial operations
  – New most restrictive VOC limit rule language

☐ Other
  – New transfer efficiency requirements
PROPOSAL

☐ **Subsume Rule 1106.1 into Rule 1106**
  – Format VOC limits into two Table of Standards, one for Marine and one for Pleasure Craft categories {PAR 1106 paragraphs (d)(1) & (d)(2)}

☐ **Add Purpose subdivision to Proposed Amended Rule 1106** {PAR1106 subdivision (a)}

☐ **Align VOC limits with U.S. EPA CTG and other CA APCDs / AQMDs** {PAR1106 paragraphs (d)(1) & (d)(2)}

☐ **Add Prohibition of Possession, Specification and Sales rule language** {PAR1106 subdivision (e)}

☐ **Add transfer efficiency requirements** {PAR1106 subparagraphs (d)(9)(A) & (d)(9)(B)}

☐ **Remove obsolete rule language**
  – Out of date rule language not necessary
PROPOSAL (CONT)

☐ Other

– Remove or amend touch-up definition and exemption
  {PAR1106 paragraph (j)(2)}

– Consider toxicity related to copper and other heavy metals, especially in antifoulant coatings

☐ Make Updates and Editorial Corrections as necessary

– Corrections to spelling errors, etc.
OTHER IMPACTS

☐ CEQA analysis

☐ Socioeconomic analysis
TENTATIVE SCHEDULE

☐ Working Group Meeting .......................... January 16, 2019
  – Please submit comments by January 30, 2019

☐ Public Workshop ..................................... February 12, 2019

☐ SSC ............................................................. March 15, 2019

☐ Set Hearing ..................................................... April 5, 2019

☐ Public Hearing ................................................ May 3, 2019