



ADVISORY NOTICE

Rule 1113: **Section (b) Paragraph (66), (77), and (81)**

Original Review: **December 2009**

Revised Date: **March 2018**

Subject: **Classification of Tung Oil**

Issue:

The South Coast Air Quality Management District has been made aware of an inquiry regarding the classification of Tung Oil and what category it falls under.

Current Rule Language:

Rule 1113 section (b)(66) defines stains as “opaque or semi-transparent coatings which are formulated to change the color but not conceal the grain pattern or texture.”

Rule 1113 section (b)(77) defines varnishes as “clear or pigmented wood finishes formulated with various resins to dry by chemical reaction.”

Rule 1113 section (b)(81) defines wood coatings as “are film forming coatings used for application to wood substrates only, which are applied to substrates including floors, decks and porches. The Wood Coating category includes all lacquers, varnishes and sanding sealers, regardless of whether they are clear, semi-transparent or opaque.”

Analysis:

Tung Oil when applied to stationary structures or their appurtenances is considered an architectural use. Tung Oil cannot be classified as a clear wood finish or a varnish as defined in Rule 1113, since by themselves they do not provide a transparent or translucent solid film, or dry by chemical reaction. Tung Oil does change the color of wood without concealing the grain, and therefore may be categorized as a stain.

Conclusion:

Pure (neat) Tung Oil shall be categorized as a stain (either interior or exterior) under Rule 1113.

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