Proposed Amended Rule 1151 Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations

Working Group Meeting #3 May 21, 2024



Join Zoom Webinar Meeting

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Purpose of Proposed Rule Amendment

Address two Exempt Solvents

- Office of Environmental Health Hazard Assessment confirmed two exempt solvents have toxic endpoints:
 - para-Chlorobenzotrifluoride (pCBtF or Oxsol) fully exempted as a VOC
 - tert-Butyl Acetate (tBAc) partially exempted as VOC

Solvents used in Automotive Coatings

• Manufacturers utilize these two exempt compounds to comply with Rule 1151 VOC limits

Toxicity Priority

 South Coast AQMD Stationary Source Committee directed staff in 2017 to prioritize lowering toxicity, even if it results in higher VOC emissions

Summary of Working Group Meeting #2

Working Group Meeting #2 discussions include:

- Rule 1401 background
- PAR 1151 progress update
- Coating manufacturer survey update
- o pCBtF and tBAc transition
- Future considerations
- Potential concerns
- Next Steps



Initial Rule Considerations

- Quickly transition away from toxic exempts by:
 - Allowing higher-VOC autobody refinishing coatings to be sold into South Coast AQMD upon rule adoption
 - Coatings formulated to meet National or European VOC standards without pCBtF or tBAc
 - Requiring pCBtF and tBAc to be phased out over time
 - Establishing lower-VOC limits that would go into effect at a future date
 - BARCT assessment to evaluate technical feasibility and cost effectiveness of future effective limits

PAR 1151 Progress Update

Progress Since Working Group Meeting #2

Coating manufacturer survey responses received and data analysis underway

Met with other air districts to discuss and coordinate approach to pCBtF/tBAc

Continued to meet with industry and community stakeholders



Coating Manufacturer Survey Update

Coating Manufacturer Survey Background

- Coating Manufacturer Survey distributed in December 2023 to gather information on:
 - VOC content
 - Share of automotive refinishing coating market that contains tBAc and/or pCBtF
 - pCBtF and tBAc content ranges
 - Share of automotive refinishing coating market that is solvent or water-based
- Survey data will guide staff in proposing the pCBtF and tBAc prohibition timeline, future effective VOC content limits, and coating categories



Summary of Survey Results

- Five of seven coating manufacturers submitted survey responses
- Automotive refinishing coatings sold into South Coast AQMD:
 - Less than 1% contain tBAc
 - ~62% contain pCBtF
 - ~71% are solvent-based
 - ~29% are water-based
- Based on number of coatings reported in survey
 - Not sales weighted averages

Survey Data Assessment

Primers

• Make up ~20% of total California Sales

- Primers sold into South Coast AQMD
 - None reported contain tBAc
 - ~44.5% contain pCBtF
 - pCBtF content ranged from 0 68%
 - Average weight percent content: ~23%
 - ~97% are solvent-based
 - ~3% are water-based



Color Coatings

- Make up ~22% of Total California Sales
- Color coatings sold into South Coast AQMD:
 - None reported contain tBAc
 - ~12.5% contain pCBtF
 - pCBtF content ranged from 0 60%
 - Average weight percent content: ~20.5%
 - ~74% are solvent-based
 - ~26% are water-based



VOC Content of Existing Coatings: Color Coatings

- Based on coating manufacturer survey data, manufacturer discussion, and product data sheets, staff identified an opportunity to lower VOC content limit for color coatings
 - Non-pCBtF/tBAc coatings currently available below current rule VOC limits
 - Majority of coatings reported below 350 g/L (current limit is 420 g/L)
- Lower VOC limit would be effective at future effective date
- Staff considering carving out metallic/iridescent color coatings into subcategory
 - Tend to have higher VOC content
 - Smaller sales volume



Color Categories	Number of Products
Metallic Color Coats	25
Solid Color Coats	314

Clear Coats

- Make up ~38% of total California Sales
- Clear coatings sold into South Coast AQMD
 - None reported contain tBAc
 - ~60% contain pCBtF
 - pCBtF content ranged from 0 65%
 - Average weight percent content: ~32.5%
 - ~99% are solvent-based
 - Less than 1% are water-based



Reducers

- Reducers sold into South Coast AQMD
 - None reported tBAc
 - ~56% contain pCBtF
 - pCBtF content ranged from 0 100%
 - Average weight percent content: ~54.5%
 - ~62.5% are solvent-based
 - ~37.5% are water-based



Other Coating Types

Automotive Coating Category	% Containing tBAc	% Containing pCBtF	% Water-based	pCBtF wt % Range	Average pCBtF wt %
Adhesion Promoter	~20%	~36%	<1%	0-88	~34%
Pretreatment coating	N/A	~39%	~11%	0-71	~18%
Multi-Color coating*	N/A	N/A	N/A	-	-
Single-Stage coating	N/A	~6%	N/A	0-65	~36%
Truck Bed Liner coating	10%	40%	N/A	0-25	~16%
Uniform Finishing coating	N/A	~11%	~20%	0-60	~32%
Temporary Protective coating*	N/A	N/A	N/A	-	-
Underbody coating	N/A	N/A	~11%	-	-
Any Other Coating Types					

*No Multi-Color coatings and no Temporary Protective coatings reported in survey responses; "N/A" indicates subcategories not reported

Coating Manufacturer Survey Data Summary

- Color coatings, primers, and clear coatings make up about 80% of automotive refinishing coating sales in California
- pCBtF use prevalent across the three major coating categories, used most in primers and clear coatings
- tBAc only found in adhesion promoters and truck bed liner coatings
 - Niche categories with small sales volumes
- Water-based formulations most common in color coatings and associated components (e.g. reducers/ thinners)
 - Waterborne primers and clear coatings exist but do not have significant market penetration
- Prohibition of pCBtF will have significant impact to automotive coatings market



Estimated Emission Baseline

- 2022 Air Quality Management Plan estimated:
 - 18 tons per day (tpd) of VOC are emitted from "Coatings and Related Processes"
 - ~ 8.5 tpd attributed to automotive refinishing coatings
- Staff estimates about 7.7 tpd VOC emissions attributed to automotive refinishing coatings
 - Based on 2002 CARB Automotive Refinishing Coatings Survey, CA population growth data, and South Coast AQMD coating manufacturer survey data



2022 AQMP Top VOC Source Categories

BARCT Assessment

BARCT Assessment Background



• BARCT is defined in the California Health and Safety Code §40406 as:

"...an emission limitation that is based on the maximum degree of reduction achievable by each class or category of source, taking into account environmental, energy, and economic impacts."

- VOC limits are designed to achieve maximum reductions while taking into account economic impacts
- Cost-effectiveness threshold is \$36,000/ton of VOC reduced

Coating Categories for BARCT Assessment

- BARCT assessment will focus on 9 of 12 categories
 - Categories that utilize an average of 16% or more pCBtF
- Some categories have high pCBtF content but low sales volume
- Adhesion promoter and truck bed liner category are only categories utilizing tBAc in formulation
- Multi-color coating and temporary protective coating not reported
- Underbody coating not reported with pCBtF or tBAC

Coating Category	pCBtF wt %	Average pCBtF wt %
Adhesion Promoter	Up to 88%	34%
Pretreatment coating	Up to 71%	18%
Primer	Up to 68%	23%
Color Coating	Up to 60%	21%
Single Stage Coating	Up to 65%	36%
Clear Coating	Up to 65%	33%
Uniform Finishing Coasting	Up to 60%	32%
Truck Bed Liner Coating	Up to 25%	16%
Reducer	Up to 100%	55%

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Assess South Coast AQMD Regulatory Requirements

BARCT Assessment: South Coast AQMD Regulatory Requirements and Assess Limits of Existing Coatings

Assess South Coast AQMD Regulatory Requirements

- Coating manufacturers rely on exempt solvents to comply with Rule 1151 VOC limits
- December 2005 rule amendment established current categories and VOC limits
 - Became effective July 2008

TABLE OF STANDARDS

VOC CONTENT LIMITS

AUTOMOTIVE COATING CATEGORIES	Current Limit			
CATEGORIES	g/L	Lb/Gal		
Adhesion Promoter	540	4.5		
Clear Coating	250	2.1		
Color Coating	420	3.5		
Multi-Color Coating	680	5.7		
Pretreatment Coating	660	5.5		
Primer	250	2.1		
Single-Stage Coating	340	2.8		
Temporary Protective Coating	60	0.5		
Truck Bed Liner Coating	310	2.6		
Underbody Coating	430	3.6		
Uniform Finishing Coating	540	4.5		
Any Other Coating Type	250	2.1		

Assess South Coast AQMD Regulatory Requirements

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BARCT Assessment: South Coast AQMD Regulatory Requirements (*cont.*)

- Rule 1113 Architectural Coatings
 - Applies coatings applied to stationary sources, fields, or lawns
 - Establishes VOC limits for 59 coating categories
- Some similar categories to Rule 1151:
 - Industrial Maintenance
 - Pretreatment Primers
 - Sealers & Undercoats
 - Metallic Coatings
- Some limits likely achieved with pCBtF/tBAc

TABLE OF STANDARDS 1 VOC LIMITS

Grams of VOC Per Liter of Coating, Less Water and Less Exempt Compounds

COATING CATEGORY	Category	Current	E	ffective D	ate	Small
	Codes	Limit ¹	1/1/14	2/5/16	1/1/19	Container Exemption
Industrial Maintenance (IM) Coatings	19	100				V 3
Color Indicating Safety Coatings		480				√5
High Temperature IM Coatings	18	420				√5
Non-Sacrificial Anti-Graffiti Coatings	19a	100				√5
Zinc-Rich IM Primers	56	100	8 8			√5
Magnesite Cement Coatings	22	450				√3
Mastic Coatings	23	100	100			~
Metallic Pigmented Coatings	24	150	150			✓
Multi-Color Coatings	25	250				√3
Nonflat Coatings	26, 27, 28	50				√5
Pre-Treatment Wash Primers	29	420				√3

BARCT Assessment: South Coast AQMD Regulatory Requirements (*cont.*)

Assess South Coast AQMD Regulatory Requirements

- Rule 1107 Coatings of Metal Parts and Products
- Applies to all metal coating operations except:
 - Aerospace assembly
 - Magnet wire
 - Marine craft
 - Motor Vehicle
 - Metal container
 - Coil coating operations
- Contains similar coating categories to Rule 1151
- Some limits likely achieved with pCBtF/tBAc

VOC LIMITS Less Water and Less Exempt Compounds					
Contine	Air-	Dried	Ba	ked	
Coating	g/L	lb/gal	g/L	lb/gal	
General One-Component	275	2.3	275	2.3	
General Multi-Component	340	2.8	275	2.3	
Military Specification	340	2.8	275	2.3	
Etching Filler	420	3.5	420	3.5	
Solar-Absorbent	420	3.5	360	3.0	
Heat-Resistant	420	3.5	360	3.0	
Extreme High-Gloss	340	2.8	360	3.0	
Metallic	420	3.5	360	3.0	
Extreme Performance	420	3.5	360	3.0	
Prefabricated Architectural One- Component	275	2.3	275	2.3	
Prefabricated Architectural Multi- Component	340	2.8	275	2.3	
Touch Up	420	3.5	360	3.0	
Repair	420	3.5	360	3.0	
Silicone Release	420	3.5	420	3.5	
High-Performance Architectural	420	3.5	420	3.5	
Camouflage	420	3.5	360	3.0	
Vacuum-Metalizing	420	3.5	420	3.5	
Mold-Seal	420	3.5	420	3.5	
High-Temperature	420	3.5	420	3.5	
Electric-Insulating Varnish	420	3.5	420	3.5	
Pan Backing	420	3.5	420	3.5	
Pretreatment Coatings	420	3.5	420	3.5	

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TABLE OF STANDARDS II

VOC LIMITS					
Less water and exempt compounds					
Grams per Liter (g/L)					
PLEASURE CRAFT	CURRENT				
COATING CATEGORY	LIMIT				
Antifoulant Coatings:					
Aluminum Substrate	560				
Other Substrate	330				
Clear Wood Coatings:					
Sealers	550				
Varnishes	490				
Primer Coatings:					
Finish Primer/Surfacer	420				
High Build Primer/Surfacer	340				
Marine Deck Sealant Primer	760				
Pretreatment Wash Primer	780				
Teak Primer	775				
Topcoats:					
Extreme High Gloss Coating	490				
High Gloss Coating	420				
Any Other Coating Type	420				

• Rule 1106 – Marine and Pleasure Craft Coatings

- Applies to marine or pleasure craft coatings and any associated solvent
- Contains similar coating categories to Rule 1151
- Some limits likely achieved with pCBtF/tBAc

TABLE OF STANDARDS I

MARINE COATING CATEGORY	VOC LIMITS Less water and exempt compounds Grams per Liter (g/L)		
	BAKED	AIR DRIED	
	CURRENT LIMIT	CURRENT LIMIT	
Topcoats:			
Extreme High-Gloss Coating	420	490	
High Gloss Coating	275	340	
Pre-Treatment Wash Primer	420	420	

Assess South Coast AQMD Regulatory Requirements

> BARCT Assessment: South Coast AQMD Regulatory Requirements (cont.)

Assess South Coast AQMD Regulatory Reguirements

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Conclusion from South Coast AQMD Regulatory Requirements

- Some South Coast AQMD VOC rules or coating categories have lower limits than Rule 1151 limits
 - Most similar coatings likely achieving limits by using pCBtF and/or tBAc
 - Cannot rely on those limits as a way to achieve lower VOC limits in PAR 1151



Assess VOC Limits of Existing Coatings

Assess VOC Limits of Existing Coatings

VOC Limits of Existing Coatings

- Survey data used to evaluate existing VOC levels for coating categories
- Most coatings use either tBAc or pCBtF to comply with limits
- Two categories utilize tBAc in formulations
 - Adhesion promoters
 - Truck bed liners
 - Low total sales volumes (<1% of total sales)
- European or National limits contain no tBAc or pCBtF
 - Higher VOC limits

Automotive Coating Categories	Average VOC (g/L as Applied)	tBAc in Formulation	pCBtF in Formulation
Adhesion Promoter	528	Yes	Yes
Color Coat	340	No	Yes
Multi-Color Coating	Not Reported	Not Reported	Not Reported
Clear Coat	246	No	Yes
Pretreatment Coating	657	No	Yes
Primer	232	No	Yes
Single-Stage Coatings	334	No	Yes
Temporary Protective Coating	Not Reported	Not Reported	Not Reported
Truck Bed Liner Coating	249	Yes	Yes
Underbody Coating	382	No	Yes
Uniform Finishing Coat	467	No	Yes
Any Other Coating Type	Not Reported	Not Reported	Not Reported



Other Regulatory Requirements

BARCT Assessment: Other Regulatory Requirements

Other Regulatory Requirements

- Assessment identifies and compares other regulatory requirements for the same equipment or source type
- Ensures that proposed requirements are consistent, conforms, or more stringent than existing standards
- Staff evaluated:
 - Most California Air Districts with similar automotive coating rules
 - Federal regulation, 40 CFR Part 9 and 59 National Volatile Organic Compound Emission Standards for Automotive Refinish Coating (National Rule)
 - European Union Regulation for Paints, Varnishes, Vehicle Refinishing Products, and Activities

BARCT Assessment: Other Regulatory Requirements California Air Districts

Other Regulatory Requirements

Automotive Coating Categories	Antelope Valley - Rule 1151	Bay Area AQMD - Rule 45	Eastern Kern APCD - Rule 410.4A	Feather River AQMD - Rule 3.19	San Diego County APCD - Rule 67.20	Santa Barbara County APCD- Rule 339
Adhesion Promoter	540	540	540	540	540	540
Color Coating	420	420	420	420	420	420
Clear Coating	250	250	250	250	250	250
Pretreatment Coating (Etch)	660	660	660	660	660	660
Primer	250	250	250	250	250	250
Single-Stage Coating	340	420	340	340	340	340
Truck Bed Liner Coating	310	310	200	310	310	310
Uniform Finishing Coating	540	540	650	540	540	540
Any Other Coating Type	250	250	250	250	250	250

BARCT Assessment: Other Regulatory Requirements European and National Limits

- European and national VOC limits are typically higher
 - Do not rely on exempt compounds
- European regulations have different VOC definition
 - Based on boiling point
 - Staff reviewed several SDS, solvents used would be considered a VOC under Rule 1151

Automotive Coating Categories		South Coast Limits (g/L)	European Limits (g/L)	National Limits (g/L)
	Adhesion Promoter	540	Not Regulated	840
	Color Coating	420	420	600
Clear Coating		250	420	600
	Pretreatment Coating	660	780	780
Primer		250	540	550-580
	Single-Stage Coating	340	420	600
	Truck Bed Liner Coating	310	840	420
Uniform Finishing Coating Specialty Coating		540	-	840
		-	840	840
	Any Other Coating Type	250	-	840

Other Regulatory

Requirements

Conclusion from Other Regulatory Requirements

 Other California districts have similar VOC limits for automotive coating as South Coast AQMD Other Regulatory Reguirements

- Rely on pCBtF and/or tBAc
- European and national VOC limits are typically higher
 - Do not rely on exempt compounds



Assess Low-VOC Technologies

BARCT Assessment: Assess Low-VOC Technologies

Assess low-VOC echnologies

Low-VOC Coatings technologies include:

High Solids		Mu Comp	lti- onent	En Cur (UV/E	ergy able B/LED)	Pov Coa	vder tings
	Water Coat	borne tings	Exe Solv	mpt ents	New F Techno	Resin logies	

 Exempt compounds and waterborne technologies are predominant methods used to achieve lower VOC limits

No suitable pCBtF and tBAc replacement currently available

BARCT Assessment: Assess Low-VOC Technologies (cont.)

- Waterborne primers and clears available that meet current VOC limits
 - Do not have significant market penetration
 - May only be specified for certain substrates
- UV curable options available for primers
- No pCBtF in formulation to meet lower VOC limit
- Products demonstrate feasibility to meet current VOC limits without pCBtF or tBAc

Low VOC Coatings Identified

Automotive Coatings	Category	VOC As Applied (g/L)
Waterborne 1K Primer – Gray	Primer	86
Waterborne 1K Primer Surfacer - Gray	Primer	86
Waterborne Flexible 1K Primer	Primer	193
Waterborne High-Build 1K Primer	Primer	160
Waterborne Flexible 1K Primer Surfacer	Primer	158
UV Cured Primer Filler	Primer	120
Waterborne Acrylic Urethane Clearcoat	Clearcoat	126

Assess low-VOC

Technologies

BARCT Assessment: Assess Low-VOC Technologies (cont.)

Assess low-VOC Technologies

Staff met with coating resin and raw material suppliers to discuss emerging technologies

• Developed resin system that meets *current* VOC limits without the use of exempt solvents

Manufacturers have been working on reformulations that meet existing limits without pCBtF or tBAc

• Some indicated they are close to bringing products to market

BARCT Assessment: Initial Staff Recommendations

- Other South Coast AQMD VOC regulations potentially rely on pCBtF and/or tBAc to comply with current VOC limits
 - Cannot be the basis for future proposed limits
- Staff identified some commercially available products that meet current VOC limits without exempt solvents
- Staff did not identify low-VOC options for some categories:
 - Adhesion promoter category (low annual sales volume)

Staff Recommendation

- Establish future-effective VOC limits at the same level as current limits without pCBtF or tBAc
 - Some categories or subcategories may require higher limits
 - Some categories or subcategories may be able to achieve lower limits

BARCT Assessment: Next Steps



- Cost-effectiveness analysis will be conducted for initially recommended VOC limits
 - Will consider cost difference between high-VOC coatings and the low-VOC coatings
 - Small niche categories may not be cost-effective to reformulate
 - pCBtF is an expensive solvent, there will be some cost savings in reformulations

Initial Rule Concepts

Overall Prohibition Timeline Concept



Include sell though and use through provisions

Proposed Interim VOC Content Limits (cont.)

- During the first phase of the tBAc and pCBtF prohibition, VOC limits will be raised to allow for the use of non-pCBtF/tBAc products
- Proposed interim VOC content limits are mostly based on current European VOC limits
 - European VOC limits are generally more stringent than National Rule limits
 - Slightly different definition of a VOC (based on boiling point)
 - National Rule limits that are more stringent than European limits were used for associated categories, and for categories not established in the European regulation

Automotive Coating Categories	South Coast AQMD (g/L)	European Standards (g/L)	National Rule (g/L)
Primer	250	540	550-580
Color coating	420	420	600
Clear coating	250	420	600
Adhesion promoter	540	Not Regulated	840
Pretreatment coating	660	780	780
Single-stage coating	340	420	600
Truck Bed Liner coating	310	420	840
Uniform Finishing coating	540	-	840
Any Other Coating Type	250		840

Proposed Interim VOC Content Limits (cont.)

 Proposed VOC limit for adhesion promoters based on National Bule limit 		Automotive Coating Categories	Current South Coast AQMD VOC Content Limits (g/L)	Proposed Interim VOC Content Limits (g/L)
		Adhesion Promoter	540	840
Adhesion promoters not regulated under the		Clear coating	250	420
European regulation		Color coating	420	420*
 Potential new category for metallics 		Metallic/Iridescent Color coating	-	420
Based on survey data several smaller niche		Multi-Color Coating	680	680
a based off survey data, several sinaller, filtre		Pretreatment coating	660	780
products that comply with current VOC limits		Primer	250	Proposed Interim VOC Content Limits (g/L) 840 420 420* 680 780 540 420 630 780 540 420 60 310 430 540
without pCBtE/tBAc		Automotive Coating CategoriesCurrent South Coast AQMD VOC Content Limits (g/L)Proposed Interim VOC Content Limits (g/L)Adhesion Promoter540840Clear coating250420Color coating420420*Metallic/Iridescent Color coating-420Multi-Color Coating680680Pretreatment coating660780Primer250540Single-Stage coating340420Temporary Protective coating6060Truck Bed Liner coating310310Underbody coating540540Any Other Coating Type250250	420	
WITHOUT PEBLIFTBAC		Temporary Protective coating	South Coast AQMD VOC Content Limits (g/L) Interim VOC Content Limits (g/L) 540 840 250 420 420 420* 680 680 660 780 250 540 660 780 340 420 10 660 340 420 10 340 430 430 9 540 540 540	
 Higher, interim limits will only be applicable to non-pCBtF/tBAc-containing coatings and 		Truck Bed Liner coating	310	310
	$\longrightarrow \rightarrow$	Underbody coating	430	430
components		Uniform Finishing coating	and Liner coating310310erbody coating430430n Finishing coating540540her Coating Tune350350	
		Any Other Coating Type	250	250

* Considering lower future VOC limit

Proposed Interim VOC Content Limits



Prohibition, Sell-Through, and Use-Through Provisions

- Staff is proposing a prohibition, sell-through, and use-through end dates
- Prohibition date is date manufacturers must stop producing pCBtF/tBAc-based coatings for sale into South Coast AQMD
- Sell-through allows coating manufacturers time to sell products manufactured prior to prohibition date already in the supply chain
- Use-through allows autobody shops time to use remaining products purchased before the prohibition took effect
- Provisions address stranded assets from both the coating manufacturers and auto body shops

Proposed pCBtF and tBAc Prohibition Timeline(s)

- Prohibition, sell-through, and use-through end dates establishes a 24-month timeframe to phase out of pCBtF and tBAc
- Coating manufacturers stated at least two years needed to fully transition nonpCBtF/tBAc products into South Coast AQMD market due to logistics, colormatch certification and labeling
 - Dates address stranded assets for products already in supply chain

Automotive Coating Categories	Prohibition Effective Date	Sell-through End Date	Use-through End Date				
	pCBtF and tBAc Prohibition Effective Dates						
All Regulated Products	6 months from date of rule adoption	18 months from date of rule adoption	24 months from date of rule adoption				

Proposed Prohibition Timeline Example for pCBtF and tBAc

Rule Adoption, November 1, 2024

Adopted by South Coast AQMD Governing Board

May 1, 2026

Sell-Through End Date

Date when existing products containing pCBtF and tBAc can no longer be sold (based on manufactured date prior to prohibition date)

) May 1, 2025

Prohibition Effective Date

Date when products with pCBtF and tBAc in formulation can no longer be manufactured for sale in South Coast AQMD

November 1, 2026

Use-Through End Date

Date when existing products containing pCBtF and tBAc can no longer be used

Provides time for shops and facilities to use existing products with pCBtF and tBAc



Future Effective VOC Limits

Will discuss proposed future effective VOC limits and compliance schedule in next meetings

Other Considerations

Potential New Coating Categories

- Considering creating several new coating subcategories with separate VOC limits
 - Metallic/iridescent
 - Matte clears
 - Manufacturers indicated matte clear coatings are niche coatings requiring higher VOC limits to achieve appearance
- Allow VOC limit to be lowered for main category and raise VOC for specialty coatings that need higher VOCs
 - Specialty coatings sold in smaller quantities
- Lower limits will partially offset VOC increase from interim VOC limits
- Several types of primers being used, subcategories could allow for different VOC levels
 - National rule has different categories with different limits

Metallic/Iridescent Color coatings

• Subcategory of color coatings

Matte Clear coatings

• Subcategory of clear coatings

Matte Single-Stage coatings

• Subcategory of single stage coatings

Primer Sealer and Primer Surfacer

• Subcategories of primers



General Quantity and Emission Report (QER)

- Staff is considering a reporting requirement similar to those in other VOC rules
- Format would be similar to the coating manufacturer survey distributed
- Will be used to quantify emissions from automotive coatings and for future rule amendments

(21) MULTI-COLOR COATING means any automotive coating that exhibits more than one color in the dried film after a single application, is packaged in a single container, and hides surface defects on areas of heavy use, and which is applied over a primer or adhesion promoter.

(27) TEMPORARY PROTECTIVE COATING means any automotive coating specifically labeled and formulated for the purpose of temporarily protecting areas from overspray or mechanical damage.

Removing Categories

- No Multi-Color coatings or Temporary Protective coatings were reported in survey
 - Please provide feedback if coatings are being manufactured and used

Reducers/Thinners

South Coast AQMD does not have a VOC content limit for reducers or thinners in Rule 1151

Staff considering a prohibition of possession, sale and distribution of coating components, such as reducers or thinners, that produce a coating with a higher VOC content than its associated limit

Discourage use of high-VOC content reducers, and/or other components, with coatings already at or near the applicable VOC limit *before* mixing

Staff's Conclusions

Fastest way to phase out use of PCBTF is to raise VOC content limits (interim limit) to accommodate non-pCBtF/tBAc coatings

Adequate time needed for coating manufacturers to reformulate coatings without pCBtF Technically feasible to reduce limits (future effective VOC limits) back down to current VOC limits

Next Steps

Complete BARCT Assessment

Release Initial Version of Draft Rule Language

Continue to hold Working Group and individual stakeholder meetings

Continue to review existing products on the market

Anticipated Public Hearing – 4th Quarter

Working Group Materials

• Working group materials for each working group meeting will be made available: https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules

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	Archived							
	Recent Actions		Information regar	ding Working Group N	leetings, Public W	orkshops, and	supporting	
			letters received, a	nd other information of	can be found by cl	licking the rule	in the table.	
			Information asso	iated with the rule de	velopment proces	ss for rules that	were	
			adopted of amen	ico within the post in	e years can be too		avea rage.	
			Please refer to th	South Coast AQMD F	Rule Book to obtai	in the current li	ist of adopte	d
			or amended rules	and regulations.				
			For current rule f	precast please see the	monthly Governin	ng Board Agend	la.	
			Rule Name	Description				
			Regulation III	Fee Rules				
			Rule 218.2 and Rule 218.3	Proposed Rule 218.2 - General Provisions	Continuous Emissio	on Monitoring Sys	stem:	
				Proposed Rule 218.3 - Performance Specificat	Continuous Emissio Ions	on Monitoring Sys	stem:	

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To receive email updates, sign up at South Coast AQMD sign up page http://www.aqmd.gov/sign-up

Enter email address and name

Subscribe by scrolling down to "Rule Updates" and check the box for Rule 1151 and click on the subscribe button at bottom of page

Future meeting notices, links to documents, and any updates will be sent via email

	During this difficult time, South Coast AQM	ID is committed to prot	ecting air quality and Contact Gra	l public health. Ple nta & Bide + On	tase visit our COVID- line Servicee - m	19 page for the opera n Looking For -	ational updates and Sign Up + Sea	latest infor rch	mation. <u>Learn n</u>
	South Coast	Y INCENTIVES & PROGRAMS	RULES & COMPLIANCE	PERMITS	NEWS, WEBCASTS, & CALENDAR	TECHNOLOGY ADVANCEMENT	RESOURCES	MEE AGENI MINU	TING DAS & ITES
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				Sign Up)				
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	Subscribe by checkin General Notificatio	ng the box adjacent t	o the E-Mail List(s) you are interes	sted in and then C	LICK on the Subsc	ribe button belov	ĸ	
	 Events & Confer 	ences		List of	f stakeholders intere	ested in events and	conferences.		
	Environmental J	ustice Conference		Intere - TBD	st in attending a So)	uth Coast AQMD E	J Conference (Mor	e Informat	ion
	South Coast AQ	/ID News		Brief u confer	updates highlighting rences, equipment (what is current at sexchanges, advisor	South Coast AQME les, etc.), such as	
ile Updates:									
Rule 1151		Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations							
Rule 1153.1		Emissio	ns of Oxide	s of Nitroge	en from Com	nmercial Foo	d Ovens		
Rule 1159.1		Control	of NOx Emi	ssions fron	n Nitric Acid	Tanks			

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