

Proposed Amended Rule 1107: *Coating of Metal Parts and Products* (PAR 1107)

Working Group Meeting #4
May 7, 2025



Join Zoom Webinar

<https://scaqmd.zoom.us/j/94612306963>

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AGENDA

Summary of Recent Rule Development Efforts

PAR 1107 Updated Survey Results

Challenges with Phasing Out pCBtF and t-BAC

PAR 1107 Initial Draft Rule Language

Next Steps

Summary of Recent Rule Development Efforts

Summary of Working Group Meeting (WGM) #3

- Presented the initial findings from the Coating Manufacturer Survey data
- Explained pCBtF and t-BAC phase out considerations
- Encouraged manufacturers to submit survey responses if they had not already

Rule Development Progress Since WGM #3

- Staff met with coating manufacturers to determine the availability of alternatives and appropriate sell through and use through timelines
- One additional Coating Manufacturer Survey was submitted
- Received and analyzed updated Coating Manufacturer Survey data

PAR 1107 Updated Survey Results

PAR 1107 Updated Survey Results

Rule 1107 Coating Categories

General One-Component

General Multi-Component

Military Specification

Etching Filler

Solar-Absorbent

Heat-Resistant

Extreme High-Gloss

Metallic

Extreme Performance

Prefabricated Architectural One-Component

Prefabricated Architectural Multi-Component

Touch Up

Repair

Silicone Release

High-Performance Architectural

Camouflage

Vacuum-Metalizing

Mold-Seal

High-Temperature

Electric-Insulating Varnish

Pan Backing

Pretreatment Coatings

- Previously five coating categories were reported to be sold in the manufacturer surveys:
 - General One-Component
 - General Multi-Component
 - Heat-Resistant
 - Metallic
 - High-Temperature
- The updated survey responses included reports for one additional coating category (Etching Filler)
- Out of the 22 coating categories in Rule 1107, six were reported to contain pCBtF and/or t-BAC
- The results of the manufacturer survey do not indicate sales for 16 of the Rule 1107 coating categories in South Coast AQMD
- Staff plans to continue rule development under the assumption that pCBtF and t-BAC can be phased out of the unreported categories with no issues

PAR 1107 Emission Limits & National Emission Limits

VOC limits for coating categories in Rule 1107 are separated into baked and air-dried coatings

Coating	Rule 1107 VOC Limits for Air-Dried Coatings (g/L)	National VOC Limits for Air-Dried Coatings (g/L)
General One-Component	275	340
General Multi-Component	340	340
Etching Filler	420	420
Heat Resistant	420	420
Metallic	420	420
High-Temperature	420	420

- All reported coatings offered for sale in the South Coast AQMD are air-dried
- South Coast AQMD air-dried limits are similar to the national air-dried limits
 - Of the reported categories, only general one-component has a different national VOC limit
- National products that do not use pCBtF or t-BAc will:
 - Allow for rapid phase out of pCBtF and t-BAc in South Coast AQMD, for categories with replacement products currently available
 - Allow manufacturers to conserve resources by avoiding widespread reformulation

Reported Coating Category Reformulation Needs

General One-Component

The manufacturer survey indicates there are viable alternatives to pCBtF and/or t-BAc already in use (approximately 88% of reported coatings do not contain pCBtF/t-BAc)

Viable pCBtF and t-BAc free alternatives exist therefore there is no need to reformulate

Heat Resistant and High-Temperature

The manufacturer survey indicates there is minimal pCBtF or t-BAc in heat resistant and high temperature coatings offered for sale in the South Coast AQMD (only one coating contained pCBtF)

No need to reformulate

Metallic, Etching Filler, and General Multi-Component

The manufacturer survey indicates that metallic, etching filler, and general multi-component coatings offered for sale in the South Coast AQMD are reliant pCBtF and/or t-BAc

Reformulation must be considered



Challenges with Phasing Out pCBtF and t-BAc

A photograph of laboratory glassware on a reflective surface. In the foreground, a small Erlenmeyer flask is filled with a bright green liquid. Behind it, a larger Erlenmeyer flask is also filled with the same green liquid. To the right, a graduated cylinder is partially visible, also containing the green liquid. The background is blurred, showing more glassware and a hint of a laboratory setting.

Reformulation

- Based on coating manufacturer feedback and past coatings rule developments, staff understands that coating reformulations require the extensive resources, especially when prohibiting key Rule 102 — Definition of Terms exempt solvents
 - Cost estimates for the reformulation process are in the hundreds of thousands
 - It can take up to four years to reformulate
- Staff is considering the additional time associated with product reformulation for coatings that do not have national replacements

Sell-Through and Use-Through Considerations

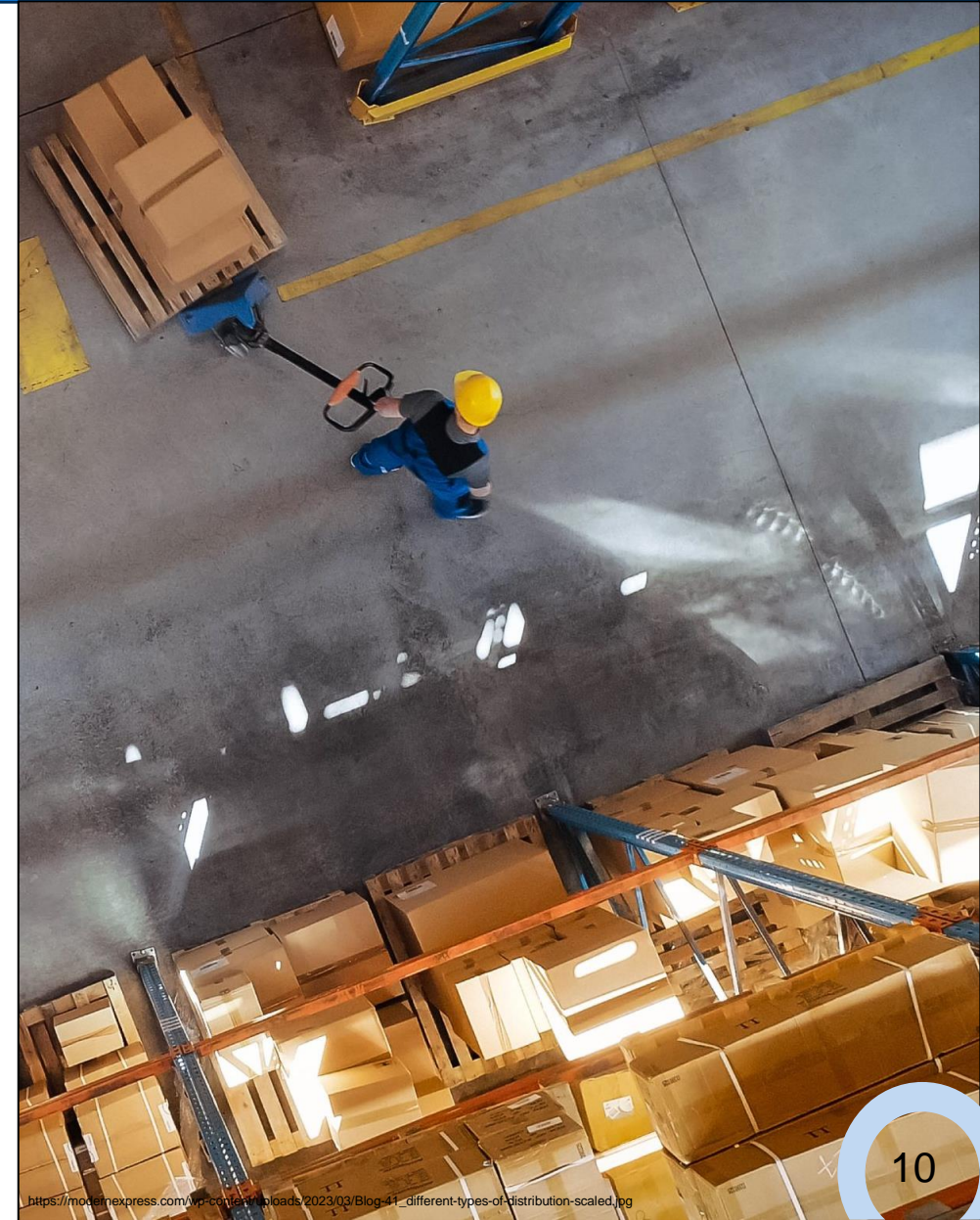
Sell-through and use-through periods allow time to adjust product lines and avoid stranded assets

Manufacturers indicated that ceasing the production of coatings containing pCBtF and/or t-BAc can be accomplished in as soon as ten months

Coatings typically certified with a shelf life of 24 months

- This can vary depending on end user needs and the stringency of the performance standards for the coating in question
- Staff is considering product shelf life in the proposed use-through dates

Based on discussions with manufacturers, the typical industry standard for use-through periods is one to three years





PAR 1107 Initial Draft Rule Language

Overview of Rule Changes

The following slides contain key updates to the proposed rule language

Additional minor edits include:

- Capitalization of defined terms
- Updated rule references
- New table titles
- Updated formatting to reflect the preferred South Coast AQMD rule format

New and Modified Definitions – Subdivision (c)

Grams of VOC Per Liter of Coatings Less Water and Less Exempt Compounds and Grams of VOC Per Liter of Material

- The modification to the subscripts for volatile and exempt compounds in both equations will have no change on value of VOC calculated
- The existing definitions are modified to be consistent with the definitions in Rule 1151 - Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations (Rule 1151)

Reducer or Thinner

- A new definition added to provide consistency and clarity for new and existing requirements



Lowest Applicable VOC Limit – Paragraph (d)(8)

New provision requires any coating that is designed, or advertised, to be used in multiple categories meet the lowest VOC limit of the applicable categories listed in Table 1

- The new provision is consistent with existing rule language in Rule 1113 – Architectural Coatings



Prohibition of Cadmium, Hexavalent Chromium, and Group II Exempt Compounds – Subparagraphs (e)(2)(A – C)

Added language that prohibits cadmium, hexavalent chromium, and group II exempt compounds in the specified concentrations from coatings

Use of cadmium, hexavalent chromium, and group II exempt compounds is restricted in other rules, including Rule 1151

Staff is proposing an immediate prohibition under the assumption that these compounds are not being used to comply with the current VOC limits



Prohibition of pCBtF and t-BAc – Subparagraph (e)(2)(D)

Added language prohibiting coatings that contain pCBtF and/or t-BAc after the effective dates in the newly added Table 2

Manufacturers are required to cease all production of coatings containing pCBtF and/or t-BAc (except metallic, general multi-component, and etching filler coatings) by July 1, 2026

pCBtF/t-BAc containing coatings made prior to the applicable prohibition of manufacturing can be sold for one year after the final manufacture date

Prohibition on the use and possession of any coatings containing pCBtF and/or t-BAc is two years after the prohibition of sale



Prohibition Dates for the Manufacture, Sale, and Use of Coatings Containing pCBtF and/or t-BAC

Coating Category	Final Manufacture Date	Final Sell-Through Date	Final Use-Through and Possession Date
Metallic	July 1, 2030	July 1, 2031	July 1, 2033
General Multi-Component			
Etching Filler			
All Other Categories	July 1, 2026	July 1, 2027	July 1, 2029

- Coatings may not contain more than 0.01 percent by weight of pCBtF and/or t-Bac after each deadline
 - Limit provides a compliance buffer in the event of unintentional contamination
- Staff's proposal phases out pCBtF and t-BAC as quickly as feasible, while providing coating manufacturers time to reformulate coating categories that currently do not have alternatives
- Staff's proposal will remove pCBtF and t-BAC from all metal parts and products coatings by July 1, 2033, with no increase in VOC emissions

Methods of Analysis for Exempt Perfluorocarbon Compounds – Subparagraph (f)(1)(B)



- This provision specifies the approved test methods for determining the VOC content of metal parts and products coatings
- The structure is amended and streamlined to be consistent with the other coatings rules; however, the content remains unchanged

Product Labeling and Administrative Requirements – Subdivision (m)

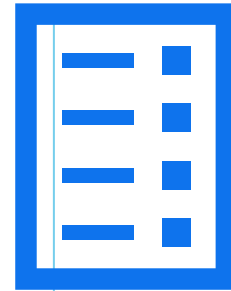
- Paragraphs (m)(1) and (m)(2) contain coating labeling requirements based on those in found Rule 1151 and Rule 1113 — Architectural Coatings (Rule 1113) including:
 - Applicable Coating category
 - VOC content
 - Manufacture date
 - Manufacturer recommendations and instructions
- The new labeling requirements take effect 12 months after the adoption of PAR 1107
- Paragraph (m)(3) contains administrative requirements consistent with Rule 1113 to not hold a coating manufacturer liable if coatings are applied incorrectly leading to violation of the VOC limits in Table 1



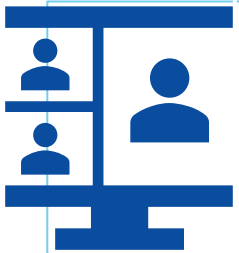
Next Steps



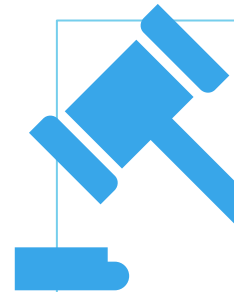
Continue working with stakeholders and refine rule language



Release preliminary draft rule language and support documents



Anticipated Public Workshop to be held in June/July 2025



Anticipated Public Hearing 4th Quarter 2025

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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This page includes a list of rules that are actively in rule development or have recently been proposed and/or amended.

Information regarding Working Group Meetings, Public Workshops, and supporting documents such as presentations, draft staff reports, draft proposed rules, comment letters received, and other information can be found by clicking the rule in the table.

Information associated with the rule development process for rules that were adopted or amended within the past five years can be found on our [Archived Page](#).

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For current rule forecast please see the monthly [Governing Board Agenda](#).

Rule Name	Description
Regulation III	Fee Rules
Rule 218.2 and Rule 218.3	Proposed Rule 218.2 - Continuous Emission Monitoring System: General Provisions Proposed Rule 218.3 - Continuous Emission Monitoring System: Performance Specifications

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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
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Contacts

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Joshua Ewell
Air Quality
Specialist
jewell@aqmd.gov
(909) 396-2212

Isabelle Shine
Program Supervisor
ishine@aqmd.gov
(909) 396-3064

Michael Morris
Planning and Rules
Manager
mmorris@aqmd.gov
(909) 396-3282

Michael Krause
Assistant Deputy
Executive Officer
mkrause@aqmd.gov
(909) 396-2706