



California Council for Environmental and Economic Balance

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September 10, 2025

Mr. Joshua Ewell

Planning, Rule Development, and Implementation

South Coast Air Quality Management District 21865 Copley Drive, Diamond Bar, CA 91765

Subject: Comments on Proposed Amended Rule 1107 – Coating of Metal Parts and Products

Dear Mr. Ewell,

The California Council for Environmental and Economic Balance (CCEEB) is a coalition of business, labor and public policy leaders that work together in pursuit of balanced and effective policy solutions. Many CCEEB member organizations operate facilities in the South Coast Air Quality Management District (SCAQMD or “District”). We are closely following the development of PAR 1107 which applies to maintenance activity at some of our members’ facilities.

CCEEB understands the need to move away from the use of pCBtF and t-BAc in coatings. In developing this phaseout, we ask that you consider the following points:

- (1) **Reformulation is needed.** CCEEB agrees with District’s assessment that reformulating a new system involves many factors and requires significant time and resources. To many CCEEB members, reformulating a new solvent-based coating system without pCBtF or t-BAc is needed because waterborne or acetone-based coatings do not provide the desired protection and durability. A complete coating system includes multiple components such as primer, basecoat, topcoat, catalyst/initiator/hardener/accelerator, thinner/reducer, brush additive, colorant, etc.
- (2) **Colorant Challenge.** It is important to note that a homogeneous colorant is essential to any coating system. While promising progress is made to primer, basecoat, topcoat, catalyst, thinner, brush additive, reformulating a new colorant without pCBtF or t-BAc presents a unique challenge, and requires additional R&D work and field verification tests.
- (3) **Table 2 Prohibitions.** According to the proposed amendment to definitions, adding colorant during color matching is considered as a General One-Component system and determined that reformulation is not needed. In addition, the District also concluded that the

reformulation is not needed for Extreme High-Gloss, Extreme Performance, Prefabricated Architectural One-Component, Prefabricated Architectural Multi-Component, Touch Up and Repair coatings and imposed a July 1, 2026 manufacture phase out deadline. These conclusions were made without consideration of the need for colorant reformulation and its lengthy process. CCEEB suggests moving those categories to July 1, 2030 manufacturer phase out date.

- (4) **Colorant Point-of-Sale Concept.** With known challenges of reformulating a new solvent-based colorant without pCBtF or t-BAC, no one could ensure its ultimate success. Because an insignificant amount of colorant is needed in coating applications, CCEEB suggests placing a Rule 1113 style limit to colorant at point-of-sale. CCEEB would agree to limit 55% wt. pCBtF and zero t-BAC in solvent-based colorant after July 1, 2030 at point-of-sale.
- (5) **Metallic Coating Definition.** Metallic Coating is defined differently in Rule 1113 and in Rule 1107. Rule 1113 sets elemental metallic pigment at 48 grams per liter, while Rule 1107 limits the metal element to 5 grams per liter. CCEEB suggests aligning the Metallic Coating definition in Rule 1107 with Rule 1113 to eliminate confusion and streamline coating development and compliance.
- (6) **Qualification for Classification as Extreme-Performance Coating.** Extreme-Performance coating is also included in Rule 1113 (as Industrial Maintenance Coating) and Rule 1136. However, Rules 1113 and 1136 do not require pre-approval from the District prior to applying Extreme-Performance coating. In general, the District assigns compliance responsibilities to facilities, including selecting the right coating categories to apply. It should not be any different in applying Extreme-Performance Coating. CCEEB suggests deleting PAR1107(j), where pre-approval from the District is required prior to applying Extreme-Performance coating, again to align with Rule 1113 and Rule 1136.
- (7) **Touch Up and Repair Application.** The current Rule 1107 definitions limit Touch Up coating only “after the main coating operation” and Repair coating only “following normal painting operations”. One could interpret as Touch Up and Repair applications are limited to metal parts and products manufacturer shop coating only. However, field touch up and repair coating to metal parts and products is unavoidable. This is primarily because scratches occur during shipping/handling and installation. CCEEB suggests including field touch up and repair in the definitions. CCEEB could also suggest combining Touch-Up and Repair definitions and VOC limits in Table 1.
- (8) **Aerosol Coating Products.** Aerosol coating products are categorically exempt from District coating rules including Rules 1106, 1113, 1136, 1145 and 1151. However, PAR1107(g)(4) provides partial exemption to VOC limits only, making Rule 1107 the only District coating rule that requires recordkeeping of aerosol coating products. CCEEB suggests aligning with other coating rules and providing full exemption to aerosol coating products.

- (9) **Possession of non-Rule 1107 compliant products.** CCEEB members are concerned about the word “possess” added in PAR1107 section (d)(2) and (e)(2). Coating products possessed by or stored at facilities may be used for different coating rule applications. Rule 1113 compliant products may not meet other coating rules standard, e.g., Rule 1107, but they are stored onsite. Prohibiting the possession of non-Rule 1107 compliant products on property is unreasonable, and impracticable. CCEEB suggests deleting the word “possess” in section (d)(2) and (e)(2) or clarifying that possession is allowed if the product will be used in compliance with another SCAQMD rule or used only outside the SCAQMD jurisdiction.

(10) Issues Specific to Utilities:

- Durability of the coating is very important. In the water and electric utility industry, the equipment is always in service except for scheduled maintenance and repair outages when there is a short window of opportunity to remove and re-apply protective coatings on the equipment. That is why the coatings used must be reliable, trustworthy and last for multiple years.
 - Coatings that contain t-BAC and/or pCBtF are more durable and perform much better in harsh conditions than other coatings. They have long-lasting corrosion protection, adhere well and maintain a strong bond with minimally prepared surfaces, offer good resistance to abrasion, and can withstand continuous high temperatures. Not applying a strong undercoat will result in premature corrosion and rusting.
 - The frequency of applying protective coating varies and depends on the environmental conditions (e.g., is the coating in contact with water, submerged underwater, in direct sunlight). In ideal conditions, the coatings can be expected to last 10 or more years.
- Coatings applied to utility equipment are based on specifications provided by the equipment manufacturer or utility engineers. In some cases, the manufacturer or engineer specifies a coating that contains pCBtF and/or t-BAC.
 - Did SCAQMD perform a technology assessment of coatings currently used on utility equipment to identify whether suitable alternative coatings without pCBtF and/or t-BAC are available that would do the same job?
 - Examples of utility equipment include pumps, valves, fuel gas compressors, and transformers.
 - If suitable alternative coatings are not available, the phase out dates should be delayed and/or SCAQMD could consider an exemption for specialty coatings for utility equipment.

- Employee safety is very important; the painters always wear personal protective equipment (PPE) and set up a containment area when applying coatings, so there is no exposure to any toxic substances when applying the coatings.
- Regulatory standards should also be considered. For example, protective coatings that contact drinking water must be approved/certified to comply with California drinking water standards.
- If coatings need to be reformulated, more time is needed before the phase out takes effect. Need to consider a full exemption if the coating cannot be reformulated in a way that does the same job.
- If phasing out pCBtF and/or t-BAC will increase the VOC content of the coatings, should the VOC Limits in Table 1 be increased?

CCEEB recognizes the importance of this proposed rule and, along with our members, commits to work with you in its development. Please let me know if you would like to meet to discuss our comments in greater detail.

Sincerely,

A handwritten signature in blue ink that reads "Bill Quinn". The signature is fluid and cursive, with the first name "Bill" and last name "Quinn" clearly distinguishable.

William J. Quinn
CCEEB Consultant

cc: Mr. Tim Carmichael
Mr. Peter Okurowski
Ms. Kirstin Kolpitcke
Members of the South Coast Air Project