California Council for Environmental and Economic Balance
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November 2, 2026

Albert Ochoa
Planning, Rule Development, and Implementation
South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765

Subject: Comments on Proposed Amended Rule 1113 – Architectural Coatings

Dear Mr. Ochoa,

The California Council for Environmental and Economic Balance (CCEEB) is a coalition of business, labor and public policy leaders that works together to develop balanced and effective policy solutions. Most CCEEB member organizations operate facilities in the South Coast Air Quality Management District (SCAQMD or "District") that will be affected by PAR 1113 - Architectural Coatings, and; as such, we are closely following the development of these amendments.

In addition to the comments provided below, CCEEB members have concerns regarding the potential impacts of PAR 1113 on the protective coatings used on potable water infrastructure, particularly potable water storage tanks. We intend to submit a separate comment letter addressing these special needs in greater detail.

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

1. **Inventory of Architectural Coating Products.** CCEEB understands that the PAR 1113 structure is built on the information collected from paint manufacturer surveys and Rule 314 reports. CCEEB members are concerned about the representation, completeness, and accuracy of the inventory. It is entirely voluntary for paint manufacturers to participate in the survey. While nearly 200 paint manufacturers do business in this region, only 68 of them provided preliminary responses. Rule 314 collects fees from paint manufacturers that distribute or sell products that are subject to Rule 1113. It presents potential, but real motivation for someone to avoid fee obligation by branding its products as general coating not specifically for Rule 1113 applications. CCEEB would like to see the District reevaluate the source and the quality of the inventory and consider additional sources of information, e.g., CARB's Consumer Products Regulation.

VMS or DMC in Architectural Coating Products. The District plans to ban VMS and DMC in Rule 1113 products as well, but did not elaborate whether VMS or DMC are currently used in architectural coatings. CCEEB suggests investigating and sharing findings in future workgroup meetings.

2. **Metallic Pigmented Coatings and Nonflat Coatings**. **Metallic Pigmented Coatings and Nonflat Coatings**. The District placed both Metallic Pigmented Coatings and Nonflat Coatings in Level 2 group based on the finding that <10% sales volume containing pCBtF/t-Bac. Because both metallic pigmented costings and nonflat coatings cover very broad paint products, sale volume should not be used as the only determining factor. CCEEB members believe that large percentage of them would require reformulation work; therefore, CCEEB requests placing these two categories in the Level 3 group.

3. **Potential Reduction of VOC Limit**. The District indicated that there would be opportunities to further reduce VOC limits, but did not provide details. CCEEB suggests having this discussion as early as possible if it is still District's intention.

4. **Level 3 Prohibition Schedule**. CCEEB recommends establishing a uniform four-year prohibition date for all Level 3 products, with a two-year sell-through period. In addition, given the potential for further VOC limit reductions, CCEEB seeks clarification regarding the relationship between the existing three-year sell-through period for products subject to VOC standards and the proposed two-year sell-through period for products containing pCBtF/t-BAc. CCEEB believes it is important to understand the rationale for this difference and how the respective timelines would be coordinated.

5. **Small Container Exemption**. CCEEB would like to point out that small container exemption is an important and practical compliance option for small, specialty and localized applications including lettering, sketching and repair/touchup work. CCEEB suggests the District keep the small container provision applicable to where viable alternatives are unavailable.

6. **Colorant Challenge.** It is important to note that a homogeneous colorant is essential to any colored coating system. While promising progress is made to primer, basecoat, topcoat, catalyst, thinner, and brush additives, reformulating a new colorant without pCBtF/t-BAc presents unique challenges include color matching, gloss texture, weathering and overall chemical compatibility. All of these require additional R&D work and field verification tests.

   CCEEB has worked with the District closely during recent development of PARs 1105, 1107 and 1136. These rule amendments provide additional time to ban manufacturing of pCBtF/t-BAc containing colorant, allowing the time needed for reformulating the new pCBtF/t-BAc free colorant. CCEEB suggests District implement a similar provision in Rule 1113 for architectural coating products.

7. **Technology Assessment**. CCEEB appreciates the District's willingness to conduct a technology assessment prior to manufacturing prohibition dates. This will be a very important check to ensure the reformulations are complete and successfully tested in the field before the prohibition takes effect. CCEEB strongly recommends that the District include a technology assessment in all coating rule amendments.

   The Technology Assessment should also address end-user performance and maintenance requirements. Reformulated products should be evaluated as complete coating systems under representative field conditions. Relevant considerations should include color and gloss matching,

decorative effects, adhesion to existing finishes, weathering, corrosion and chemical resistance, durability, and application and curing times in various weather conditions. Facilities that perform work during overnight maintenance periods or limited shutdown windows need alternatives that can achieve the required performance within those operating constraints. CCEEB encourages the District to consult affected end users when conducting technology assessment, and to consider providing narrowly tailored provisions where suitable alternatives have not been demonstrated.

For the District to conduct a meaningful technology assessment for the Level 2 group, and to allow reformulation to advance, CCEEB suggests setting 30-months as the prohibition date for this group. The District could conduct a technology assessment six months before the prohibition date.

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

Sincerely,



William J. Quinn
CCEEB Consultant

cc: Sarady Ka
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