



April 2, 2026

Governing Board Members
South Coast Air Quality Management District
21865 Copley Dr.
Diamond Bar, CA 91765
cob@aqmd.gov

Re: Oppose-- Proposed Amended Rule (PAR) 1136 – Wood Coatings

Dear Honorable Board Members,

On behalf of California Safe Schools, a children's environmental health and environmental justice coalition established in 1998, we are writing to express concerns regarding the current version of PAR 1136.

Our organization prioritizes pollution prevention and safeguarding the health and safety of children, staff, and community members—particularly in disadvantaged communities and near school sites impacted by toxic emissions.

The proposal, as written, subjects environmentally preferable materials to the same conditions as those that may contain toxic and/or high levels of volatile organic compounds (VOCs).

The stated goal of the rule amendments is to transition away from products containing para-chlorobenzotrifluoride (pCBTF) and tert-butyl acetate (t-BAC). However, the rule currently includes a "low-use" exemption that could allow up to one gallon per day of these materials to remain in use, including products with VOC levels as high as 750 grams per liter. Exemptions should be based on emissions rather than on volume of use.

The District's rules should encourage reformulation toward materials with the potential for zero-VOC emissions.

We urge the district to include a "low VOC" exemption comparable to the exemption provided for low-use products. We suggest that exemption eligibility be based on actual emissions and not the number of gallons used.

We respectfully request that PAR Section (k)(1) Exemptions be modified as follows:

"The provisions of this rule shall not apply to facilities that emit less than one pound per day of VOCs, as applied."

By adopting an emissions-based framework, policymakers can better protect air quality while promoting innovation and supporting businesses committed to pollution prevention.

Sincerely,

A handwritten signature in black ink that reads "Robina Suwol Executive Director". The signature is written in a cursive style with a horizontal line underlining the name.

Robina Suwol
Executive Director
California Safe Schools
818.785.5515 office
818.261.7965 cell
robinalisesuwol@gmail.com
www.calisafe.org