



California Council for Environmental and Economic Balance

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April 29, 2026

Mr. Michael A. Cacciotti
Chair
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Subject: Comments on Proposed Amended Rule 1136 – Wood Products Coatings

Dear Mr. Cacciotti,

The California Council for Environmental and Economic Balance (CCEEB) is a coalition of business, labor, and public policy leaders working together to advance balanced and effective policy solutions. Our members include representatives from the aerospace, entertainment, petroleum refining, and utilities sectors. Many of these members operate facilities within the South Coast Air Quality Management District (SCAQMD or “District”).

We support the staff proposal for Proposed Amended Rule 1136.

The purpose of these amendments is straightforward: to phase out the use of pCBtF and t-Bac, compounds that the California Office of Environmental Health Hazard Assessment has determined to be toxic.

In developing these amendments, CCEEB has emphasized two key principles:

1. Allow sufficient time for necessary reformulations; and
2. Conduct a technology assessment prior to the phase-out of any product to ensure the approach is appropriate.

The staff proposal successfully meets both objectives.

Some organizations have attempted to use this rulemaking process to introduce additional, unrelated issues. For example, a suggestion was raised just one day before the rule came before you last month to replace the one-gallon-per-day exemption with a one-pound-per-day VOC emissions limit. This proposal was not discussed during working group meetings or at any point during the rule development process.

Many facilities—both large and small—rely on the current exemption. Transitioning to a one-pound-per-day limit would impose meaningful and burdensome operational impacts. For instance, facilities would need to implement new recordkeeping systems to comply. Moreover, adopting this change at this stage could inadvertently increase the use of pCBtF and t-Bac due to their relatively low VOC content.

CCEEB strongly recommends that the amendments remain focused on the original purpose of the rulemaking, as reflected in the staff proposal. We respectfully request that you approve the proposal without modification.

Thank you for your consideration.

Sincerely,



William J. Quinn
CCEEB Consultant

cc: Members, SCAQMD Board Members
SCAQMD Clerk of the Board
Wayne Nastri
Susan Nakamura
Sarah Rees
Michael Krause
Tim Carmichael
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Members, South Coast Air Project