



## California Council for Environmental and Economic Balance

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Mojtaba Moghani

Planning, Rule Development, and Implementation

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

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

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”) with wood coatings operations and, as such, we are closely following the development of PAR 1136.

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) **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, show quality and durability. A complete coating system includes multiple components such as primer, basecoat, topcoat, sealer, catalyst, initiator, hardener, accelerator, thinner, reducer, brush additive, colorant, etc. and each needs individual reformulation work.

(2) **Colorant Challenge.** It is important to note that a homogeneous colorant is essential to any colored coating system. While promising progresses are 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) **Rule 1107 Approach for Colorant.** CCEEB had worked with District closely during recent Rule 1107 amendment rulemaking. The Amended Rule 1107, in section (e)(3) and (e)(4), provides additional time (until December 5, 2030) to ban manufacturing of pCBtF-containing colorant, allowing the time needed for reformulating the new pCBtF free colorant. CCEEB suggests District implement a similar policy in Rule 1136 for wood coating products.

(4) **Technology Assessment.** CCEEB appreciates District willingness to consider conducting a technology assessment prior to manufacturing prohibition dates. This will be very important check to ensure the reformulations are complete and successfully tested in the field. CCEEB

strongly recommends District to adopt the technology assessment in all coating rules amendments.

CCEEB recognizes the importance of this proposed rule and, along with our members, commits to work with you to 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: Sarady Ka  
Heather Farr  
Michael Morris  
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