

# Proposed Amended Rule 1136: *Wood Products Coatings (PAR 1136)*

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Public Workshop  
February 4, 2026

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# Agenda

Rule 1136 Background

Rule Language Review

Emission Reductions

Socioeconomic Impacts

California Environmental Quality Act (CEQA)

Next Steps

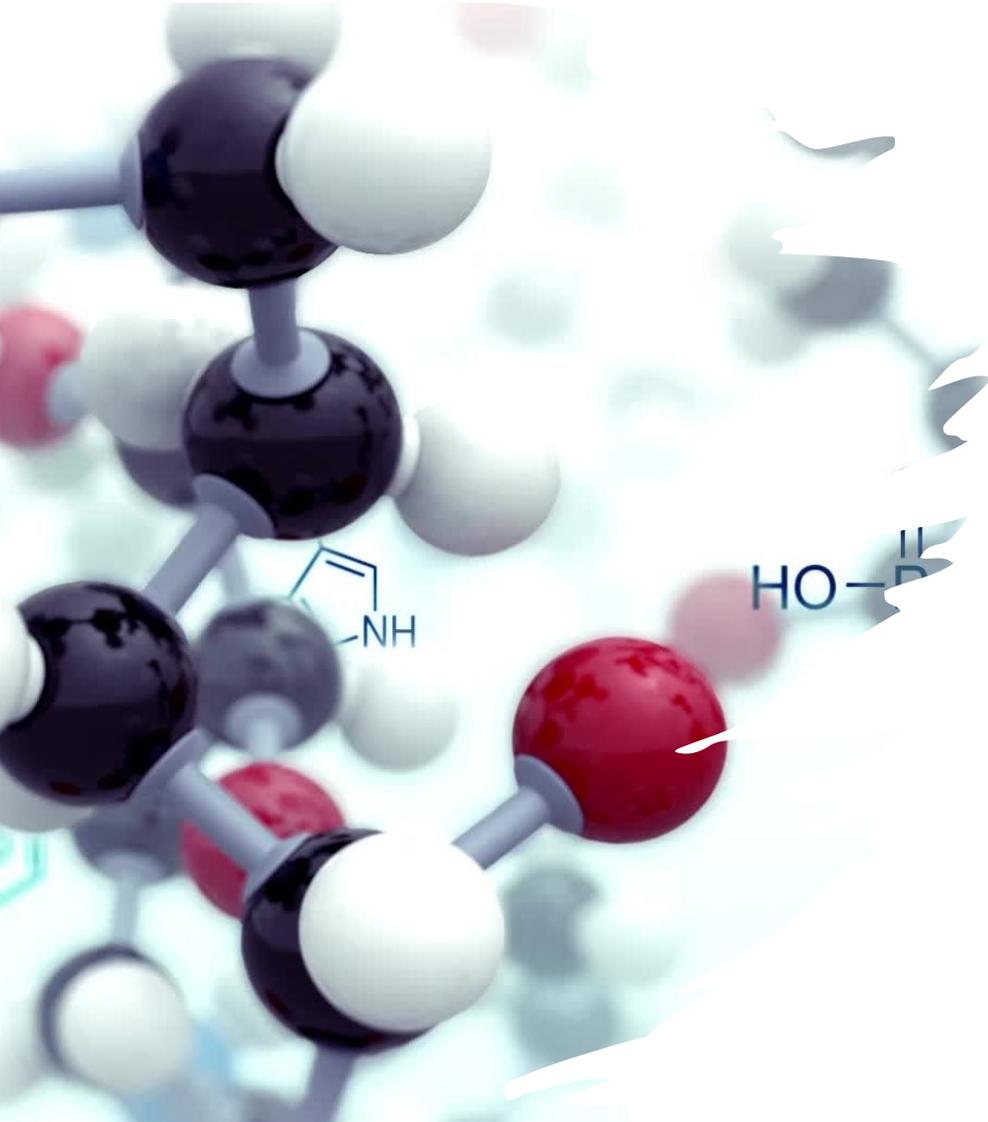
# Rule 1136 Background

- Adopted in 1983 and last amended in 1996
- Regulates Volatile Organic Compounds (VOCs) that are emitted from any wood products coating, wood products coating component, or associated solvent
  - Manufacturers rely on exempt compounds to meet VOC limits
- Does not apply to residential non-commercial operations





# Exempt Compounds

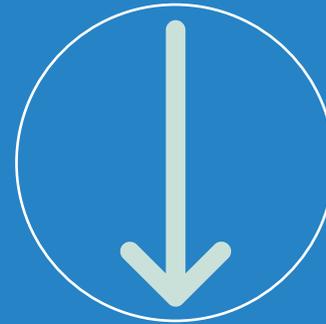


- U.S. EPA exempts some solvents from the VOC definition
  - Solvents with low photochemical reactivity (less than ethane)
  - Do not consider toxicity in exemptions
  - Key exempt compounds include: acetone, pCBtF, and t-BAc
- South Coast AQMD Approach
  - Considers U.S. EPA exemptions plus toxicity, ozone depletion, and environmental impact
  - Rule 102 Exempt Compound Groups:
    - Group I: Not expected to be restricted
    - Group II: Often prohibited in VOC rules
- Special Exemptions
  - t-BAc has limited use exemption in:
    - Rule 1113 (Architectural Coatings) and Rule 1151 (Motor Vehicle Coatings)

# PAR 1136 Amendment Objectives



Evaluate VOC content and usage of pCBtF and t-BAc in the wood coating industry



Reduce health risk from the use of:  
- pCBtF (CAS#: 98-56-6)  
- t-BAc (CAS #: 540-88-5)



# Overall Phaseout Approach for pCBtF and t-BAc

Maintain current VOC limits and establish reactivity-based VOC limits

Establish a future effective phase-out date for pCBtF, t-BAc, and other Group II Exempt Solvents

- Considering three years from rule adoption

After phase-out date, allow sell-through and use-through to address pCBtF-containing coatings in the supply chain

# **Rule Language Overview**

# Key Proposed Rule Updates

Reorganized, updated, and removed outdated language

Streamlined coating categories

Added provisions to phase out pCBtF and t-BAC, including reactivity-based limits and prohibition schedule

Propose removing outdated and unused provisions

Other minor changes

- Capitalization of defined terms, updated rule references

# Rule Structure Updates

## Rule 1136

- (a) Purpose and Applicability
- (b) Definitions
- (c) Requirements
- (d) Recordkeeping Requirements
- (e) Prohibition of Specifications
- (f) Test Methods
- (g) Continuous Monitors
- (h) Rule 442 Applicability
- (i) Alternative Emission Control Plan
- (j) Progress Reports
- (k) Air Quality Management Plan (AQMP) Technology Assessment Audit
- (l) Exemptions

## Proposed Amended Rule 1136

- (a) Purpose
- (b) Applicability
- (c) Definitions
- (d) Requirements
- (e) Alternative Emission Control Plan
- (f) Prohibition of Possession, Specification, Sale or Use
- (g) Administrative Requirements
- (h) Test Methods
- (i) Continuous Monitors
- (j) Rule 442 Applicability
- (k) Exemptions

## Subdivision (a) & (b)

- Separated purpose and applicability to reflect current rule convention

### Rule 1136

- (a) Purpose and Applicability  
The purpose of Rule 1136 is to reduce volatile organic compounds (VOC) emissions from the application of coatings or strippers to, and surface preparation of, any wood products, including furniture, cabinets, shutters, frames and toys. This rule shall not apply to residential noncommercial operations.

### Proposed Rule 1136

- (a) ~~Purpose and Applicability~~  
The purpose of Rule 1136 is to reduce ~~volatile organic compounds~~ Volatile Organic Compounds (VOCs) and toxic emissions from the application of ~~coating~~ Coatings or ~~strippers~~ Strippers to, and surface preparation of, any ~~wood products~~ Wood Products, ~~including furniture, cabinets, shutters, frames and toys.~~ ~~This rule shall not apply to residential noncommercial operations.~~
- (b) Applicability  
This rule is applicable to any Person who supplies, sells, offers for sale, markets, manufactures, blends, packages, repackages, possesses, or distributes any Wood Products Coating, Wood Products Coating component, or associated solvent for use within the South Coast AQMD, as well as any owner or operator of a Facility who uses, applies, or solicits the use or application of any Wood Coating Materials, Strippers, or associated solvents within the South Coast AQMD. This rule shall not apply to residential non-commercial operations.

# Subdivision (c)

## Deleted Definitions

- Deleted unused definition
  - Stencil coatings
- Renamed and consolidated categories
  - Clear Sealer is now Clear Primer, Sealer, and Undercoats
  - Multi-Colored Coatings are now Topcoats



~~(6) CLEAR SEALER is a coating containing binders, but not opaque pigments, which seals the wood product prior to application of the subsequent coatings.~~

(6) CLEAR PRIMERS, SEALERS, AND UNDERCOATS are Coatings containing binders, but not opaque pigments, which seals the Wood Product prior to application of the subsequent Coatings.

~~(31) MULTI-COLORED COATING is a coating which exhibits more than one color when applied, and which is packaged in a single container and applied in a single coat.~~

~~(45) STENCIL COATING is an ink or a pigmented coating which is rolled or brushed onto a template or stamp in order to add identifying letters and/or numbers to wood products.~~

# Subdivision (c) (cont.)

## Deleted Definitions

- Removed definitions associated with expired exemptions
  - Classic Guitars
  - Custom Replica Furniture
  - Touch-up Coatings
- Removed definitions associated with Emission Averaging Provision
  - Potential to Emit
  - Rate per Day
  - Rate per Calendar Year

- (5) ~~CLASSIC GUITARS~~ are replicas of guitars that were originally manufactured before 1965 and are manufactured by the same original processes.
- (13) ~~CUSTOM REPLICA FURNITURE~~ is new, made-to-order furniture that looks like antique furniture, rather than new furniture. It features detailed wood carvings and bruising of the wood to simulate antique furniture.
- (48) ~~TOUCH-UP COATING~~ is a coating used to cover minor coating imperfections appearing after the main coating operation.
- (35) ~~POTENTIAL TO EMIT~~ means the maximum capacity of a facility to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation, emissions, or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation is enforceable by the EPA Administrator.
- (38) ~~RATE PER DAY~~ is the amount applied between 12:00 a.m. and 11:59 p.m. on the same calendar day.
- (39) ~~RATE PER CALENDAR YEAR~~ is the amount applied between 12:00 a.m. January 1 and 11:59 p.m. December 31.

# Subdivision (c) (cont.)

## New Definitions

- Added definitions related to new provisions
  - MIR
  - Colorants
- Added clarifications and streamlined definitions
  - Air Pollution Control System
  - Executive Officer
  - Facility
  - Person

- (2) AIR POLLUTION CONTROL SYSTEM is combination of an enclosed space capable to capturing emissions, and an air pollution control device, which is equipment installed to reduce VOC emissions, installed to collect and reduce emissions from the exhaust stream of any spray booth, curing oven, or application area.
- (9) COLORANTS are solutions of dyes or suspensions of pigments.
- (15) EXECUTIVE OFFICER is as defined in Rule 102 – Definition of Terms (Rule 102).
- (19) FACILITY is a business, or public service engaged in Wood Coating operations, including the application of Wood Coatings, that are owned or operated by the same Person or Persons and are located on the same or contiguous parcels.
- (32) MAXIMUM INCREMENTAL REACTIVITY (MIR) means the measure of the photochemical reactivity of a VOC, which estimates the weight of ozone produced from a weight of VOC expressed as gram of ozone per gram of VOC (g O<sub>3</sub>/g VOC).
- (35) PERSON is as defined in Rule 102.

# Subdivision (c) (cont.)

## New Definitions

- Added definitions related to new provisions
  - PW-MIR
- Streamlined Wood Coating Material
  - Includes all coatings in the rule except strippers

(39) PRODUCT-WEIGHTED MIR (PW-MIR) means the sum of all weighted-MIR for all ingredients in a Wood Coating Material. The PW-MIR is the total product reactivity expressed to hundredths of a gram of ozone formed per gram of product (excluding container and packaging) and calculated according to the following equations:

Weighted MIR (Wtd-MIR) ingredient= MIR x Weight Fraction ingredient.

And,

$PW-MIR = (Wtd-MIR)_1 + (Wtd-MIR)_2 + \dots + (Wtd-MIR)_n$

Where:

MIR = ingredient MIR; and

1,2, 3..., n = each ingredient in the product up to the total n ingredients in the product.

(52) WOOD COATING MATERIAL is any Coating, Primer, Sealant, Topcoat, Stain, Ink, or Filler, used during the manufacturing, assembly, refinishing, maintenance or service of a Wood Product.

## Subdivision (c) (cont.)

### Modified Definitions

- Streamline
  - Removed discussion from Conventional Air Spray, more appropriate for Staff Report
- Clarifications
  - Included test method to clarify how solids are determined for High and Low-Solids stains

- (~~12~~13) CONVENTIONAL AIR SPRAY means a spray ~~coating~~Coating method in which the ~~coating~~Coating is atomized by mixing it with compressed air at an air pressure greater than 10 pounds per square inch (gauge) at the point of atomization and does not include: ~~Airless~~airless and air assisted airless spray technologies or are not conventional air spray because the coating is not atomized by mixing it with compressed air. ~~E~~lectrostatic spray technology ~~is also not considered conventional air spray because an electrostatic charge is employed to attract the coating to the workpiece.~~
- (~~17~~18) EXTREME PERFORMANCE COATING is a two-component high-solids epoxy, urethane or polyester ~~coating~~Coating which requires the mixing of a resin and a catalyst, and is applied to a wood product to achieve a high glossHigh Gloss and/or high film build coat ~~which cannot be achieved with a low-VOC coating~~, or to protect the wood product from one or more of the following environmental conditions:
- (~~25~~27) HIGH-SOLIDS STAINS are stains containing more than ~~1~~one pound of solids per gallon of material, where the solids content is determined pursuant to ASTM D 2369 – Standard Test Method for Volatile Content of Coatings (ASTM D 2369), and include wiping stains, glazesGlazes, and opaque stains.
- (~~29~~31) LOW-SOLIDS COATING is a ~~coating~~Coating containing ~~1~~one pound, or less, of solids per gallon of material, where the solids content is determined pursuant to ASTM D 2369.

## Subdivision (c) (cont.)

### Modified definitions

- Clarifications

- Added test method to Washcoat
- Word smithed Simulated Wood Materials and Roller Coating

- Updated and corrected VOC Composite *Vapor* Pressure term

- (4243) ROLL ~~COATER~~COATING is a ~~series of mechanical rollers that applies a thin coating~~Coating ~~on the wood product~~ method using a machine that applies Coating to a substrate by continuously transferring coating through a pair or set of oppositely rotating rollers.
- (4445) SIMULATED WOOD MATERIALS are materials, ~~such as plastic, glass, metal, paper etc.,~~ that are made to give a wood-like appearance or are processed like a wood product and include materials such as plastic, glass, metal, and paper.
- (5251) WASHCOAT is a ~~coating~~Coating that contains no more than ~~1.0~~one pound of solids per gallon of material, where the solids content is determined pursuant to ASTM D 2369, and which is used to seal wood product surfaces, ~~for any of the following purposes to:~~
- (A) ~~to prevent~~ Prevent undesired staining;<sub>;</sub>
  - (B) ~~to control~~ Control penetration;<sub>;</sub>
  - (C) ~~to provide~~ Provide a barrier when paper laminates are applied to the ~~wood~~Wood ~~product~~Product;<sub>;</sub>
  - (D) ~~to seal~~ Seal ~~glazes~~Glazes;<sub>;</sub> or
  - (E) ~~to improve~~ Improve adhesion of a waterborne topcoat.
- (5049) VOC COMPOSITE ~~PARTIAL-VAPOR~~ PRESSURE is the sum of the partial pressures of the compounds defined as VOCs and calculated according to the following equation:-

# Clarification on Streamlined Coating Categories

- Consolidated categories into three main categories
  - Primers, Sealers and Undercoats
  - Topcoats and
  - Other
    - Includes Barrier Coat and Plastic components
    - Combined Filler and Composite Wood Edge Filler into Fillers category
    - Added Japans and Strippers in from the rule to the table

Proposed Category	Existing Category	VOC (g/L)
Primers, Sealers, and Undercoats (PSU)		
Clear PSU	Same	275
Pigmented PSU	Same	275
Topcoats (includes extreme performance and multi-colored coatings)		
Clear Topcoat	Same	275
Pigmented Topcoats	Same	275
Other Categories		
High-Solid Stains	Same	350
Inks	Same	500
Mold-Seal Coatings	Same	750
Fillers	Composite Wood Edge Filler	275
	Filler	
Japans	From exemption subdivision, new in the table	350
Other Coatings	Barrier Coat - Plastic Components	275
Low-Solids Barrier Coat - Plastic Components	Same	120
Low-Solid Stains, Toners, and Washcoats	Same	120
Strippers	New	350

# Subdivision (d) (cont.)

## Paragraph (d)(1)(A) – (C) VOC Content of Wood Coatings Materials

Streamlined and added language  
for optional reactivity-based limits

### (ed) Requirements

#### (1) VOC Content of Wood Coatings Materials and Strippers

~~(A) — A person~~ No Person or facility shall ~~not~~ manufacture, supply, sell, offer for sale, market, blend, distribute, package, or repackage any Wood Coating Materials or Stripper for use within South Coast AQMD, nor shall any owner or operator of a Facility apply or solicit any coating to the use of wood product any Wood Coating Materials or Strippers, which has a VOC content in excess of the applicable limits specified in Table 1 — Regulatory VOC Content Limits for Wood Material (Table 1) and Table 2 — Regulatory VOC Content Limits for Low Solids Coatings. Compliance with the applicable VOC content limits shall be based on VOC content including any VOC-containing material added to the original coating Wood Coating Material or Stripper supplied by the manufacturer, which contain VOCs in excess of the applicable:

(A) ~~exceeds the applicable~~ Regulatory VOC limits specified below in Table 1 – Table of Standards (Table 1);

(B) Actual VOC limits specified in Table 2 – Table of Standards for Low-Solids Coatings (Table 2); or

(C) In lieu of complying with the applicable Regulatory VOC limits specified in Table 1 or the Actual VOC limits specified in -Table 2, a Person may manufacture, supply, sell, offer for sale, market, blend, distribute, package, or repackage a Wood Coating Material for use within South Coast AQMD, and an owner or operator of a Facility may apply or solicit the use of a Wood Coating Material within South Coast AQMD, that complies with the alternative PW-MIR VOC limits specified in Table 1 or Table 2 where MIR values for individual VOCs shall be as specified in Sections 94700 and 94701, Title 17, California Code of Regulations;

## Subdivision (d) (*cont.*)

### Original Subparagraph (c)(1)(B)

Removed paint stripper  
provision and added  
requirements to Table 2

### Subparagraph (d)(1)(D) – Strippers used on Wood Products

Allows strippers to comply  
through alternative PW-MIR or  
composite vapor pressure limits  
in addition to mass-based VOC  
limits, providing flexibility

~~(B) A person shall not use a stripper on wood products unless:~~  
~~(i) it contains less than 350 grams of VOC per liter of material; or~~  
~~(ii) the VOC composite vapor pressure is 2 mm Hg (0.04 psia) or less at~~  
~~20°C (68°F).~~

(D) In lieu of complying with the Actual VOC limit specified in Table 2, a Person may manufacture, supply, sell, offer for sale, market, blend, distribute, package, or repackage a Stripper for use within South Coast AQMD, and an owner or operator of a Facility may apply or solicit the use of a Stripper within South Coast AQMD, that complies with:

- (i) The alternative PW-MIR VOC limits specified in Table 2, where MIR values for individual VOCs shall be as specified in Sections 94700 and 94701, Title 17, California Code of Regulations; or
- (ii) The alternative Composite Vapor Pressure limit specified in Table 2.

# Subdivision (d) (cont.)

- Removed existing VOC limit tables and added 2 new tables
- Table 1 – Table of Standards
  - High solids coatings subject to Regulatory VOC limits
  - Includes mass-based VOC and alternative PW-MIR limits
- Table 2 - Low-solids Table of Standards
  - Materials subject to Actual VOC limits
  - Includes mass-based and PW-MIR limits and Composite Vapor Pressure limit for Strippers

**Table 1 – Table of Standards  
VOC Limits**

Coating Categories	Regulatory VOC limits		lbs VOC/ lb of solids	Alternative PW- MIR Limit
	g/L-Coating	lb/gal-Coating		g O <sub>3</sub> /g product
<u>Primer, Sealer, and Undercoats (PSU)</u>				
<u>Clear PSU</u>	<u>275</u>	<u>2.3</u>	<u>0.36</u>	<u>0.53</u>
<u>Pigmented PSU</u>	<u>275</u>	<u>2.3</u>	<u>0.21</u>	<u>0.60</u>
<u>Topcoats (including extreme performance)</u>				
<u>Clear Topcoats</u>	<u>275</u>	<u>2.3</u>	<u>0.35</u>	<u>0.53</u>
<u>Pigmented Topcoats</u>	<u>275</u>	<u>2.3</u>	<u>0.25</u>	<u>0.46</u>
<u>Other Categories</u>				
<u>High-Solids Stains</u>	<u>350</u>	<u>2.9</u>	<u>0.42</u>	<u>1.87</u>
<u>Inks</u>	<u>500</u>	<u>4.2</u>	<u>0.96</u>	<u>N/A</u>
<u>Mold-Seal Coatings</u>	<u>750</u>	<u>6.3</u>	<u>4.20</u>	<u>N/A</u>
<u>Fillers</u>	<u>275</u>	<u>2.3</u>	<u>0.18</u>	<u>N/A</u>
<u>Japans</u>	<u>350</u>	<u>2.9</u>	<u>0.42</u>	<u>N/A</u>
<u>Other Coatings</u>	<u>275</u>	<u>2.3</u>	<u>0.3</u>	<u>N/A</u>

**Table 2 – Table of Standards for Low Solids Coatings and Strippers  
VOC Limits**

	Actual VOC Limits		Alternative PW-MIR Limit	Composite Vapor Pressure
	g/L-Material	lb/gal-Material	g O <sub>3</sub> /g product	mmHg (0.04 psia) or less at 20°C (68°F)
<u>Low-Solids Barrier Coat – Plastic Component</u>	<u>120</u>	<u>1.0</u>	<u>N/A</u>	<u>N/A</u>
<u>Low-Solids Stains, Toners, and Washcoats</u>	<u>120</u>	<u>1.0</u>	<u>1.03</u>	<u>N/A</u>
<u>Strippers</u>	<u>350</u>	<u>2.9</u>	<u>1.50</u>	<u>2</u>

## Subdivision (d) (*cont.*)

- Proposing to remove the emissions averaging provision
- Not being used and as currently written, are not enforceable

### ~~(ii) Emissions Averaging Plan (Plan)~~

~~Owners or operators shall submit a Plan, pursuant to Rule 221 - Plans, to the Executive Officer to participate in emissions averaging. The plan may not be implemented until it is approved in writing by the Executive Officer. Submittal of the Plan does not provide an exemption from the rule requirements. The Plan shall include, at a minimum:~~

- ~~(I) A description of the wood product coatings to be included in the averaging program; and~~
- ~~(II) A description of the quantification and recordkeeping procedures for coating usage; coating VOC and solids content; VOC emissions; and calculations to show daily compliance with clause (e)(1)(D)(i).~~

## Subdivision (d) (*cont.*)

### Paragraph (d)(3) – Transfer Efficiency

Streamlined language

#### (23) Transfer Efficiency

An ~~person or owner~~ or operator of a ~~facility~~ Facility shall ~~not~~ apply ~~coatings~~ Wood Coating Materials to ~~wood~~ Wood ~~products~~ Products using ~~subject to the provisions of this rule unless the coating is applied with~~ properly operating equipment, ~~operated~~ according to ~~procedures specified by the equipment manufacturer, and in compliance with the applicable permit conditions, if any, the equipment manufacturer's operating procedures, and~~ by ~~the use of~~ one of the following methods:

(A) ~~electrostatic application~~ Electrostatic Application; ~~or~~

(B) ~~flow coat~~ Flow Coating; ~~or~~

(C) Roll Coating;

~~(D)~~ ~~dip coat~~ Dip Coating; ~~or~~

~~(DE)~~ ~~high volume, low pressure (HVLP) spray~~ Spray; ~~or~~

~~(EF)~~ ~~paint~~ Paint brush; ~~or~~

~~(FG)~~ ~~hand~~ Hand roller; or

~~(G)~~ ~~roll coater~~; or

(H) Any such other ~~coating~~ Wood Coating Material application methods as ~~are~~ demonstrated, in accordance with the provisions of paragraph (i)(5), to the Executive Officer to be capable of achieving equivalent or better Transfer Efficiency than the Wood Coating Material application method listed in subparagraph (d)(4)(E), provided ~~at least 65 percent transfer efficiency, and for which~~ written approval is obtained from ~~of~~ the Executive Officer ~~has been obtained~~.

# Subdivision (d) (*cont.*)

## Paragraph (d)(4) – Solvent Cleaning Operations; Storage and Disposal

- Clarified language
  - Added who is subject to provision
  - Added prohibition from atomizing solvent cleaner similar to other VOC rules

(54) Solvent Cleaning Operations; Storage and Disposal ~~of VOC-containing Materials~~

An owner or operator of a Facility conducting solvent cleaning, which means the use of a cleaning solvent for the removal of loosely held uncured coatings, and contaminants such as dirt, soil, and grease ~~Solvent cleaning operations~~ and the storage and disposal of VOC containing materials shall:

- (A) Comply with ~~are subject to~~ the provisions of Rule 1171 - Solvent Cleaning Operations; and
- (B) Not atomize any solvent cleaner unless it is used within an approved Air Pollution Control System.

## Subdivision (e)

### Prohibition of Specifications

Proposing to delete the “Prohibition of Specifications” subdivision and added “solicit” to rule language

~~(e) Prohibition of Specifications~~

~~A person shall not specify the use in the District of any coating to be applied to any wood products subject to the provisions of this rule that does not meet the limits and/or requirements of this rule. The requirements of this paragraph shall apply to all written or oral contracts.~~

(ed) Requirements

(1) VOC Content of Wood Coatings Materials and Strippers

~~(A) — A person~~ No Person or facility shall ~~not~~ manufacture, supply, sell, offer for sale, market, blend, distribute, package, or repackage any Wood Coating Materials or Stripper for use within South Coast AQMD, nor shall any owner or operator of a Facility apply or solicit any coating to the use of wood product any Wood Coating Materials or Strippers, which has a VOC content in excess of the applicable limits specified in Table 1—Regulatory VOC Content Limits for Wood Material (Table 1) and Table 2—Regulatory VOC Content Limits for Low Solids Coatings. Compliance with the applicable VOC content limits shall be based on VOC content including any VOC-containing material added to the original ~~coating~~ Wood Coating Material or Stripper supplied by the manufacturer, which contain VOCs in excess of the applicable:

# Subdivision (f) Prohibitions

- Subdivision for prohibition and sell through for pCBtF and t-BAc
- In addition, added Group II compound prohibition
  - Included in many South Coast AQMD VOC Rules
  - Important as we allow alternative PW-MIR limits, need to prohibit low-reactivity toxic solvents
  - Prohibition allows for higher percent of Volatile Methyl Siloxanes (VMS) as they can be found as impurities in some coatings

## (f) Prohibition of Possession, Specification, Sale or Use

- (1) Effective after the applicable Manufacturer Prohibition Date in Table 3 – Prohibition Schedule (Table 3), no Person shall manufacture, supply, sell, offer for sale, market, blend, distribute, package, or repackage a Wood Coating Material or Stripper for use within South Coast AQMD, nor shall any owner or operator of a Facility possess, apply, or solicit for use any Wood Coating Material or Stripper, including any VOC-containing materials added to the original Wood Coating Material or Stripper supplied by the manufacturer, that contains any of the following chemicals in concentrations greater than the limits indicated below:
- (A) 0.01 percent by weight of Group II Exempt Compounds, excluding volatile methylated siloxanes (VMS);
- (B) 0.1 percent by weight of VMS; or
- (C) 0.01 percent by weight of para-Chlorobenzotrifluoride (pCBtF, Chemical Abstracts Service Registration Number 98-56-6) and/or tert-Butyl Acetate (t-BAc, Chemical Abstracts Service Registration Number 540-88-5) for Wood Coating Materials or Strippers manufactured after the applicable Prohibition Date in Table 3 -

# Subdivision (f) (cont.)

## Prohibition Schedule

- Table 3 establishes prohibition schedule for pCBtF, t-BAC, and Group II Compounds y
- Prohibition date will depend on category
- Coatings manufactured prior to the Final Manufacture Date can be:
  - Sold for one year after the final manufacture date
  - Used for two years after the final manufacture date

**Table 3: Prohibition Schedule**

<u>Category</u>	<u>Final Manufacture Date</u>	<u>Sell-Through Date</u>	<u>Use-Through Date</u>
<u>Wood Coating Materials</u>	<u>[Three Years after Date of Rule Adoption]</u>	<u>[Four Years after Date of Rule Adoption]</u>	<u>[Five Years after Date of Rule Adoption]</u>
<u>Colorants</u>	<u>[Five Years after Date of Rule Adoption]</u>	<u>[Six Years after Date of Rule Adoption]</u>	<u>[Seven Years after Date of Rule Adoption]</u>
<u>Strippers</u>	<u>[Two Months after Date of Rule Adoption]</u>	<u>[One Year after Date of Rule Adoption]</u>	<u>[Two Years after Date of Rule Adoption]</u>

(2) Sell Through and Use Through Provision

Any Wood Coating Material or Stripper that is manufactured prior to the applicable Table 3 Final Manufacture Date, that contains more than the applicable limits in subparagraphs (f)(1)(A), (f)(1)(B), and (f)(1)(C), may be sold, supplied, or offered for sale until the applicable Table 3 Sell-Through Date and may be possessed, used, or solicited for use until the applicable Table 3 Use-Through Date.

Request from stakeholder to extend prohibition timeline for Colorants

# Subdivision (g)

## Administrative and Recordkeeping Requirements

- Paragraph (g)(1) and (g)(2),
- No change to existing requirements, only restructured and clarified

### (dg) ~~Recordkeeping~~ Administrative and Recordkeeping Requirements

~~Records shall be maintained pursuant to Rule 109 or pursuant to an approved Emissions Averaging Plan, whichever is applicable. If compliance with the VOC limits in subparagraph (e)(1)(A) is based on the pounds of VOC per pound of solids format, then the operator shall keep a record of the VOC content of the coating in pounds of VOC per pound of solids in addition to complying with the requirements of Rule 109.~~

(1) An owner or operator of a Facility shall maintain records pursuant to the requirements of Rule 109 – Recordkeeping for Volatile Organic Compound Emissions (Rule 109).

(2) An owner or operator of a Facility complying with the VOC limits in subparagraph (d)(1)(A) based on the pounds of VOC per pound of solids, shall keep a record of the VOC content of the Wood Coating Materials in pounds of VOC per pound of solids in addition to complying with the requirements of Rule 109.

# Subdivision (g) (*cont.*)

## Administrative Requirements

- Paragraph (g)(3) is existing requirement
  - All materials containing organic solvents currently must comply with Rule 443.1, added reference to Rule for clarity
- Paragraph (g)(4) is new requirement
  - Labeling requirement for manufacturers complying with alternative PW-MIR limits

### (3) Labeling Requirements for Materials Containing Organic Solvents

A Person shall not manufacture, supply, sell, offer for sale, market, blend, distribute, package, or repackage for use in South Coast AQMD any Wood Coating Material or Stripper unless they are labeled in accordance with South Coast AQMD Rule 443.1 – Labeling of Materials Containing Organic Solvents.

### (4) Labeling Requirements for Wood Coating Materials Complying with the alternative PW-MIR VOC Limits

A Person that manufacturers, supplies, sells, offers for sale, markets, blends, distributes, packages, or repackages for use in South Coast AQMD any Wood Coating Material that elects to comply with the alternative PW-MIR VOC limits in subparagraph (d)(1)(C), shall include the PW-MIR VOC content in g O<sub>3</sub>/g product, on all containers.

# Subdivision (h)

## Test Methods

Test Method section is being updated and restructured

- Most changes for clarification
- Added South Coast AQMD Test Method 313, used to determine the VOC content of low-VOC materials (newer method)

### (fh) Test Methods

- (1) ~~The VOC content of Wood Coating Materials coatings and strippers shall be determined by:~~

The VOC content of Wood Coating Materials shall be determined by:

- (A) United States Environmental Protection Agency (U.S. EPA) Reference Method 24 (~~– Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coating, Code of Federal Regulations Title 40 Part 60, Appendix A~~); with the Exempt Compounds' content determined by ~~or~~ South Coast AQMD Test Method 303 – Determination of Exempt Compounds;
- (B) South Coast AQMD Test Method 304 (~~– Determination of Volatile Organic Compounds (VOCs) in Various Materials~~); ~~or in the South Coast Air Quality Management District (SCAQMD) "Laboratory Methods of Analysis for Enforcement Samples" manual.~~
- (C) South Coast AQMD Test Method 313 – Determination of Volatile Organic Compounds by Gas Chromatography Mass Spectrometry.

# Subdivision (h) (*cont.*)

## Test Methods

- Reorganized emission control system language
  - Used by facilities who rely on thermal oxidizers or other form of VOC control in lieu of complying with the VOC limits in rule

- (5) Determination of Efficiency of Emission Control Systems  
A Person or Facility that elects to comply with the VOC limits in paragraphs (d)(1) and/or (d)(2) using an Emission Control System shall:
- (A) Determine the efficiency of the control device in the Emission Control System by:
- (i) South Coast AQMD's "Protocol for Determination of Volatile Organic Compounds (VOC) Capture Efficiency;" or
  - (ii) Any other method approved by the U.S. EPA, CARB, and the South Coast AQMD Executive Officer; and
- (B) Determined the efficiency and the VOC content in the Emission Control System exhaust gases, measured and calculated as carbon by:
- (i) U.S. EPA Method 25 – Determination of Total Gaseous Non-methane Organic Emissions as Carbon;
  - (ii) U.S. EPA Method 25A – Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer;
  - (iii) South Coast AQMD Test Method 25.1 – Determination of Total Gaseous Non-Methane Organic Emissions as Carbon;  
or
  - (iv) South Coast AQMD Test Method 25.3 – Determination of Low Concentration Non-Methane Non-Ethane Organic Compound Emissions from Clean Fueled Combustion Sources

# Subdivision (h) (cont.)

## Test Methods

- Revised Transfer Efficiency requirement to include guidelines spray gun equivalency demonstration
- Added clarity regarding equivalent test methods
  - Requires approval from CARB, U.S. EPA, and South Coast AQMD

- (7) Transfer Efficiency  
The ~~t~~Transfer ~~e~~Efficiency of alternative ~~coating~~Coating application methods shall be determined in accordance with the most current versions of the South Coast AQMD methods:  
(A) "Spray Equipment Transfer Efficiency Test Procedure for Equipment User, ~~May 24, 1989~~;" and  
(B) "Guidelines for Demonstrating Equivalency With District Approved Transfer Efficiency Spray Gun."
- (8) Multiple Test Methods  
When more than one test method or set of test methods are specified for any testing, a violation of any requirement of this rule established by any one of the specified test methods or set of test methods shall constitute a violation of the rule.
- (9) Equivalent Test Methods  
Other test methods determined to be equivalent and approved by the U.S. EPA, CARB, and the South Coast AQMD Executive Officer, and approved in writing by the South Coast AQMD Executive Officer may also be used.
- (910) All test methods referenced in this subdivision shall be the most recently approved version.

## Subdivision (e)

- Moved Alternative Emission Control Plan from subdivision (i) to (e)
  - No changes

~~(i) Alternative Emission Control Plan~~

~~An owner or operator may achieve compliance with paragraph (c)(1) by means of an Alternative Emission Control Plan pursuant to Rule 108.~~

(e) Alternative Emission Control Plan

An owner or operator may achieve compliance with paragraph (d)(1) by means of an Alternative Emission Control Plan pursuant to Rule 108 – Alternative Emission Control Plans.

# Subdivision (j)

- Clarifies when Rule 442 applies
- Delete outdated language
  - Progress report requirements
  - AQMP Technology Assessment Audit

- (h) ~~Rule 442 Applicability~~  
Any owner or operator of a coating, coating operation, or facility ~~Facility~~ who uses Wood Coating Materials that ~~which is~~ are exempt from ~~all or a portion of~~ the VOC limits of this rule, shall comply with the provisions of Rule 442 – Usage of Solvents. ~~unless compliance with the limits specified in this rule is achieved.~~
- (i) ~~Progress Reports~~  
~~Owners or operators shall submit a progress report to the Executive Officer by January 1, 2003. The Progress Report shall include at a minimum:~~
- ~~(1) — a statement that the facility or facilities are in compliance with the final Rule 1136 VOC limits; or~~
  - ~~(2) — for each facility, a description of their wood coating process, the wood product types, the wood coatings currently in use and their VOC contents, the low-VOC wood coatings which will be tested, any expected wood coating process or control equipment modifications, and the results of previous low-VOC coating tests. Facilities shall also report if they are planning to use Mobile Source Emission Reduction Credits (MSERCs) pursuant to Regulation XVI or other alternative emission reductions allowed by District rules.~~
- (k) ~~Air Quality Management Plan (AQMP) Technology Assessment Audit~~  
~~The Executive Officer shall audit Rule 1136 by July 1, 2003 to assess the feasibility of the final VOC limits and whether new technology could provide additional reductions to meet the District's AQMP objectives.~~

# Subdivision (k)

## Exemptions

Proposing to delete outdated exemption that are no longer applicable

- ~~(3) The provisions of subparagraphs (c)(1)(A) and (C) shall not apply to the manufacturing of classic guitars until July 1, 2005.~~
- ~~(4) Refinishing, Replacement, and Custom Replica Furniture Operations: Until July 1, 1998, the provisions of subparagraphs (c)(1)(A) and (C) shall not apply to any refinishing operations necessary for preservation, to return the wood product to original condition, to replace missing furniture to produce a matching set, or to produce custom replica furniture, provided records are maintained daily for two years as to the amount, type and VOC content of each coating used.~~
- ~~(5) The provisions of paragraph (c)(1) shall not apply to touch-up and repair coatings until July 1, 2005.~~
- ~~(7) Notwithstanding the requirements of Rule 109(e)(1), Recordkeeping for Volatile Organic Compound Emissions, any facility that switches to waterborne coatings that meet the July 1, 2005 VOC limits may request written approval from the Executive Officer to record data on up to a quarterly basis, provided the Executive Officer determines that such recordkeeping allows for an equivalent level of enforceability.~~
- ~~(8) Notwithstanding the provisions of paragraph (c)(2), a person or facility may use:
  - ~~(A) any spray equipment that uses only coatings that comply with the July 1, 2005 VOC limits; or~~
  - ~~(B) any spray equipment, except conventional air spray, that uses only coatings that contain 550 grams, or less, of VOC per liter of coating, less water and less exempt compounds.~~~~

# Subdivision (k) (*cont.*)

## Exemptions

Proposing to sunset blushing exemption once the PW-MIR limits are in place

- Provision not enforceable as written
  - Blushing not defined
  - No recordkeeping requirements
- Provision would add up to an additional 100 g/L VOC to each coating during summer ozone season

- (15) Until [Three Years from Date of Rule Adoption], Notwithstanding notwithstanding the provisions of subparagraph ~~(e)(1)(A)~~(d)(1)(A), a ~~person or owner or operator of a facility~~Facility may add up to 10% by volume of VOC to a topcoat, primer, sealer or undercoat to avoid blushing of the finish during high humidity provided ~~that~~:
- (A) ~~the~~The coatingCoating is not applied from April 1 to October 31 of any year; and
- (B) ~~the~~The coatingCoating contains acetone and no more than 550 grams of VOC per liter of ~~coating~~Coating, less water and ~~exempt compounds~~Exempt Compounds, prior to the addition of VOC.

# Subdivision (k) (*cont.*)

## Exemptions

- Providing exemption from Group II prohibition to allow for continued Methylene Chloride use
  - U.S. EPA adopted a future prohibition for methylene chloride
  - South Coast allowing continued use until federal ban takes effect

(6) Methylene Chloride (CAS RN: 75-09-2) in Strippers is exempt from the prohibition in subparagraph (f)(1)(A).

# Japans

- Japans are special type of coatings used to create artistic effects used primarily in the movie industry
  - Low-use category
- Currently allowed at 700 g/L but Rule 1113 limit is 350 g/L
- Survey and Rule 1113 data indicated 350 g/L VOC limit is feasible
- Proposing to align limit with Rule 1113

~~(10) The provisions of subparagraph (c)(1)(A) shall not apply to japans, provided the VOC content is 700 grams of VOC per liter of coating, less water and exempt compounds, or less, as applied.~~

**Table 1 – Table of Standards**  
VOC Limits-

Coating Categories	Regulatory VOC limits		lbs VOC/ lb of solids	Alternative PW- MIR Limit
	g/L-Coating	lb/gal-Coating		g O <sub>3</sub> /g product
<u>Primer, Sealer, and Undercoats (PSU)</u>				
<u>Clear PSU</u>	<u>275</u>	<u>2.3</u>	<u>0.36</u>	<u>0.53</u>
<u>Pigmented PSU</u>	<u>275</u>	<u>2.3</u>	<u>0.21</u>	<u>0.60</u>
<u>Topcoats (including extreme performance)</u>				
<u>Clear Topcoats</u>	<u>275</u>	<u>2.3</u>	<u>0.35</u>	<u>0.53</u>
<u>Pigmented Topcoats</u>	<u>275</u>	<u>2.3</u>	<u>0.25</u>	<u>0.46</u>
<u>Other Categories</u>				
<u>High-Solids Stains</u>	<u>350</u>	<u>2.9</u>	<u>0.42</u>	<u>1.87</u>
<u>Inks</u>	<u>500</u>	<u>4.2</u>	<u>0.96</u>	<u>N/A</u>
<u>Mold-Seal Coatings</u>	<u>750</u>	<u>6.3</u>	<u>4.2</u>	<u>N/A</u>
<u>Fillers</u>	<u>275</u>	<u>2.3</u>	<u>0.18</u>	<u>N/A</u>
<u>Japans</u>	<u>350</u>	<u>2.9</u>	<u>0.42</u>	<u>N/A</u>
<u>Other Coatings</u>	<u>275</u>	<u>2.3</u>	<u>0.3</u>	<u>N/A</u>

# Technology Check-In

Stakeholder requested a technology check-in prior to the manufacturing prohibition dates to:

- Assess reformulation progress and confirm that alternatives have been fully developed and successfully tested under real-world conditions

Staff commits to including a technology check-in in the resolution language

- Resolution released with final Board Package

# Emission Reductions

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VOC limits in PAR 1136 remain unchanged

---

Phasing out pCBtF and t-BAc may lead to the use of replacement solvents that qualify as VOCs, potentially increasing VOC content in some formulations, though products are still required to comply with applicable VOC limits

---

Proposed PW-MIR limits for some categories are equivalent VOC limits, no change in VOC emissions are expected

---

Future VOC reductions are possible as new formulations are developed in response to the pCBtF and t-BAc phase-out



# Socioeconomic Impacts and California Environmental Quality Act (CEQA)

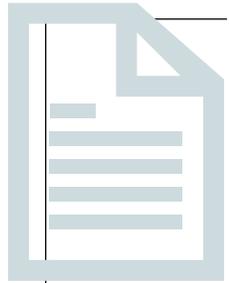
# Socioeconomic Impacts

- Socioeconomic impact analysis for PAR 1136 will consider:
  1. Types of affected industries, including small businesses
  2. Range of probable costs, including costs to industry or business
  3. Other items typically included in socioeconomic impact assessment
- Socioeconomic Impact Assessment will be made available in the Draft Staff Report at least 30 days prior to the Public Hearing on April 3, 2026 (subject to change)

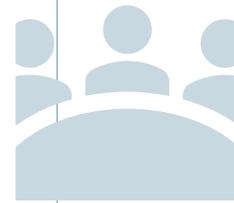
# California Environmental Quality Act (CEQA)

- PAR 1136 is a project subject to CEQA
- South Coast AQMD, as lead agency, is reviewing PAR 1136 to determine if it will result in any potential adverse environmental impacts
- Appropriate CEQA documentation will be prepared based on the analysis

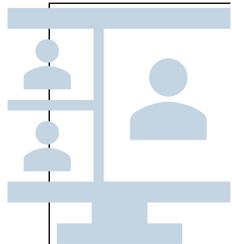
# Next Steps



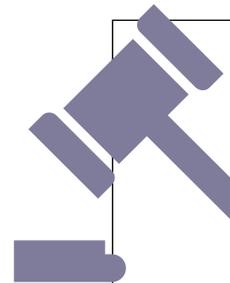
Written Comments  
Requested by  
February 18, 2026



Stationary Source  
Committee on  
February 20, 2026



Set Hearing on  
March 6, 2026



Public Hearing on  
April 3, 2026

# Working Group Materials

- Working Group materials for each Working Group meeting will be made available:

<https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules>

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## Proposed Rules and Proposed Rule Amendments

**Proposed Rules**

- [Guide to South Coast AQMD Rules](#)
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- [Recent Actions](#)

This page includes a list of rules that are actively in rule development or have recently been proposed and/or amended.

Information regarding Working Group Meetings, Public Workshops, and supporting documents such as presentations, draft staff reports, draft proposed rules, comment letters received, and other information can be found by clicking the rule in the table.

Information associated with the rule development process for rules that were adopted or amended within the past five years can be found on our [Archived Page](#).

Please refer to the [South Coast AQMD Rule Book](#) to obtain the current list of adopted or amended rules and regulations.

For current rule forecast please see the monthly [Governing Board Agenda](#).

Rule Name	Description
Regulation III	Fee Rules
Rule 218.2 and Rule 218.3	Proposed Rule 218.2 - Continuous Emission Monitoring System: General Provisions Proposed Rule 218.3 - Continuous Emission Monitoring System: Performance Specifications

# Receiving Rulemaking Updates

- To receive email updates, sign up at South Coast AQMD sign up page <http://www.aqmd.gov/sign-up>
  - Enter email address and name
  - Subscribe by scrolling down to “Rule Updates” and check the box for Rule 1136 and click on the subscribe button at bottom of page
  - An email will be sent to confirm
  - Future meeting notices, links to documents, and any updates will be sent via email

<input type="checkbox"/>	Rule 1134	Emissions of Oxides of Nitrogen from Stationary Gas Turbines
<input type="checkbox"/>	Rule 1135 and Proposed Rule 429.2	Emissions of Oxides of Nitrogen from Electric Power Generating Systems
<input checked="" type="checkbox"/>	Rule 1136	Wood Products Coatings
<input type="checkbox"/>	Rule 1138	Control of Emissions from Restaurant Operations
<input type="checkbox"/>	Rule 1138.1	Control of Emissions from Commercial Cooking Operations

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