



June 30, 2026

Heather Farr
Planning and Rules Manager
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765
Submitted via electronic transmission

Subject: Proposed Amended Rule 1143 – Initial Preliminary Rule Language

Dear Ms. Farr,

The American Coatings Association¹ (ACA), Household & Commercial Products Association,² (HCPA) and National Aerosol Association³ (NAA) appreciate the opportunity to provide comments to the South Coast Air Quality Management District (AQMD) on the Initial Preliminary Rule Language for Proposed Amended Rule 1143.⁴

The Initial Preliminary Rule Language introduces three significant policy concepts: (1) the prohibition of additional compounds, including parachlorobenzotrifluoride (PCBTF) and tert-butyl acetate (t-BAC); (2) sell-through and use-through provisions for existing inventories; and (3) an alternative Maximum Incremental Reactivity (MIR) compliance option for consumer paint thinners and multi-purpose solvents sold and used throughout the South Coast AQMD jurisdiction.

ACA, HCPA, and NAA understand that primary objective of the proposed amendment is to phase out the sale and use of PCBTF and t-BAC. Because these compounds are not currently used to any significant extent in consumer paint thinners and multi-purpose solvents, we do

¹ ACA is a voluntary, nonprofit trade association working to advance the needs of the paint and coatings industry and the professionals who work in it. The organization represents paint and coatings manufacturers, raw materials suppliers, distributors, and technical professionals. ACA serves as an advocate and ally for members on legislative, regulatory, and judicial issues, and provides forums for the advancement and promotion of the industry and coatings science.

² The Household & Commercial Products Association (HCPA) is the premier trade association representing companies that manufacture and sell \$227 billion annually of trusted and familiar products used for cleaning, protecting, maintaining, and disinfecting homes and commercial environments. HCPA member companies employ over 300,000 people in the U.S. whose work helps consumers and workers to create cleaner, healthier and more productive lives.

³ The National Aerosol Association (NAA) is an industry group devoted to serving the public's health, safety and hygiene needs through the aerosol product form. The NAA represents marketers, manufacturers, fillers and suppliers to the aerosol market.

⁴ [par-1143-initial-preliminary-draft-rule-language.pdf](#)

not anticipate substantial impacts on the marketplace for these products. However, we respectfully oppose the proposed restriction on cyclic, branched, or linear completely methylated siloxanes. Although these compounds are not presently used in consumer paint thinners and multi-purpose solvents, they may serve as viable alternatives in the future as additional regulatory restrictions are implemented. At this time, the available scientific evidence lacks conclusive toxicity data that would justify restricting these compounds.

To implement the proposed prohibition of PCBTF and t-BAC, the Initial Preliminary Draft establishes a phased compliance schedule under which products containing these compounds could no longer be manufactured after December 31, 2026, followed by a one-year sell-through period and a one-year use-through period for existing inventories. While many companies have been aware of South Coast AQMD's interest in restricting these compounds, the anticipated public hearing is not expected until October, leaving limited time for manufacturers to reformulate products, revise labels, and make necessary adjustments to distribution and inventory management systems.

As a practical matter, companies frequently defer significant reformulation and distribution-related investments until regulatory requirements have been formally adopted and become legally binding. This approach reflects practical business considerations, particularly given that federal and state regulatory actions have, at times, been delayed, modified, or withdrawn during the rulemaking process. Additionally, companies considering the use of the MIR compliance option will require sufficient time to revise, print, and implement new product labels displaying the applicable maximum product-weighted MIR limit.

Accordingly, ACA, HCPA, and NAA respectfully request that the manufacturing prohibition become effective one year after rule adoption. This additional implementation time would provide regulated entities with a reasonable opportunity to complete the product development, operational, labeling, and compliance-related activities necessary to ensure an orderly and effective transition to the new requirements.

In addition, we recommend extending the proposed sell-through period from one year to two years following the manufacturing prohibition. Although many products move through distribution channels relatively quickly, specialty products such as consumer paint thinners and multi-purpose solvents may remain in inventory for longer periods, particularly at smaller retailers and independent businesses. A two-year sell-through period would help minimize unnecessary product disposal and reduce economic impacts while still achieving the rule's objectives.

ACA, HCPA, and NAA also request clarification and modification of the proposed use-through provisions. As currently drafted, the provision could be interpreted to prohibit the use of products by consumers after the expiration of the use-through period. In practice, South Coast AQMD does not regulate products stored and used by consumers in their homes after purchase. To avoid ambiguity and unintended consequences, we recommend that the use-

through provision be revised to apply only to regulated entities and facilities subject to South Coast AQMD jurisdiction.

Lastly, ACA, HCPA, and NAA appreciate South Coast AQMD's inclusion of an alternative MIR-based compliance option. We support the availability of this alternative pathway and encourage the South Coast AQMD to consider incorporating additional MIR-based compliance options in future rulemakings where appropriate. Such approaches can provide flexibility while maintaining air quality objectives and promoting innovation in product formulation.

ACA, HCPA, and NAA appreciate the opportunity to provide these comments and look forward to continuing our engagement with South Coast AQMD as the rulemaking process moves forward.

Respectfully Submitted,

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NAA