



South Coast Air Quality Management District

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COMPLIANCE ADVISORY

Date: August 8, 2026
To: Manufacturers, suppliers, sellers, distributors, and users of automotive coatings subject to [Rule 1151](#) - Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations
Subject: Alternative VOC Content Limits for Color Coatings

South Coast AQMD is issuing a Compliance Advisory regarding Rule 1151 Paragraph (d)(4):

*In lieu of complying with the Phase I Color Coating VOC limit in Table 1 of the rule, and until January 1, 2030, a person may elect to manufacture, supply, sell, offer for sale, market, blend, distribute, possess, package, or repackage any Color Coating for use within the South Coast AQMD, or apply a Color Coating to a Motor Vehicle, Mobile Equipment, or Associated Parts and Components of a Motor Vehicle or Mobile Equipment, **that is supplied in half-pint or smaller containers**, provided the Regulatory VOC content is no more than 720 g/L and the Color Coating does not contain more than 0.01 percent by weight of either pCBtF or t-BAc.*

Background

Paragraph (d)(4) allows the temporary sale and use of high-VOC color coatings, if the VOC content is no greater than 720 g/L and they do not contain *para*-Chlorobenzotrifluoride (pCBtF) or *tert*-Butyl Acetate (t-BAc), provided *they are supplied* in half-pint or smaller containers.

Most medium and large-sized autobody shops have transitioned to low-VOC, water-based color coating systems; however, some small autobody shops still rely on solvent-based formulations. Paragraph (d)(4) was intended to provide smaller autobody shops time to transition to water-based color coatings, by allowing the purchase of small volumes of high-VOC, pre-mixed, ready-to-spray color coatings as needed for each job. In those cases, the alternative VOC limit is very clear: it applies to a single, half-pint container of color coating. After rule adoption, stakeholders requested to use this alternative limit for multicomponent color coatings and components of color coatings.

Clarification of Alternative VOC Content Limits for Color Coatings in paragraph (d)(4)

The Alternative VOC limit provision:

- Allows distributors or retailers to supply high-VOC (under 720 g/L) color coatings in half-pint or smaller containers.
- Allows *distributors or retailers* to blend high-VOC (under 720 g/L) color coatings using automotive coating components (e.g., toners, activators, binders, reducers) that are themselves in containers larger than a half-pint in size provided the final resulting color coating is packaged and supplied in a half-pint or smaller container.
- Does not restrict the number of high-VOC (under 720 g/L) color coatings packaged and supplied in half-pint or smaller containers to single facility, nor does it restrict the number of half-pint or smaller containers that may be sold in a single transaction.
- Allows facilities, autobody shops, and end users to add automotive coating components (e.g., toners to further adjust the color, reducers to adjust the viscosity, and activators to cure the coatings) to high-VOC (under 720 g/L) color coatings packaged and supplied in half-pint or smaller containers prior to use, provided the VOC content of the final, ready-to-spray color coating complies with the 720 g/L VOC limit.
- Does not require automotive coating components (e.g., toners, activators, binders, reducers) to be supplied in half-pint or smaller containers; however, as stated in the above bullet, if the automotive coating component is added to the high-VOC (under 720 g/L) color coatings packaged and supplied in half-pint or smaller containers, the VOC content of the final, ready-to-spray color coating must comply with the 720 g/L VOC limit.

The Alternative VOC limit provision does **not**:

- Allow Facilities, autobody shops, or end users to blend a color coating using the *automotive coating components*, e.g., combining basecoats, toners, and activators) that were supplied in containers *larger* than a half pint. For example, an autobody shop cannot purchase high-VOC components of a color coating supplied in containers larger than a half pint and, subsequently, blend color coatings, even if they are blended to half-pint or smaller volumes. The high-VOC (under 720 g/L) color coatings must be packaged and supplied to the facility, autobody shop or end use in half-pint or smaller containers, not blended on site where the color coating is being applied.
Allow the high-VOC (under 720 g/L) color coatings to contain more than 0.01 percent by weight of pCBtF or t-BAc.

For more information regarding this Compliance Advisory, please contact:

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