

[SCAQMD 1151 Working Group Meeting Response – ACA Member Company](#)

Below are points for consideration from review of the proposed rule 1151.

1. We agree with the bifurcation of the Color Coating category into 2 categories (Color Coating, and Metallic Color Coating). However, we are seeking clarification on the definition of (11) Color Coating because it appears to point to two limits on Table 1. Section (d) Requirements. Table 1 has the Phase II categories: Color Coating at 250g/l VOC on 1/1/2028, and Metallic Color Coating at 420g/l VOC on 1/1/2028 and the (11) Color Coating definition appears to point to both. Please see suggested definition below.

Proposed rule 1151, Section (c) Definitions:

In current draft - (11) COLOR COATING means any pigmented Automotive Coating, excluding automotive Adhesion Promoters, and Primers, that require a subsequent Clear Coating, and which is applied over a Primer, Adhesion Promoter or Color Coating. Color Coatings include Metallic Color Coatings.

Recommendation - (11) COLOR COATING means any pigmented Automotive Coating, excluding automotive Adhesion Promoters, and Primers, that require a subsequent Clear Coating, and which is applied over a Primer, Adhesion Promoter or Color Coating.

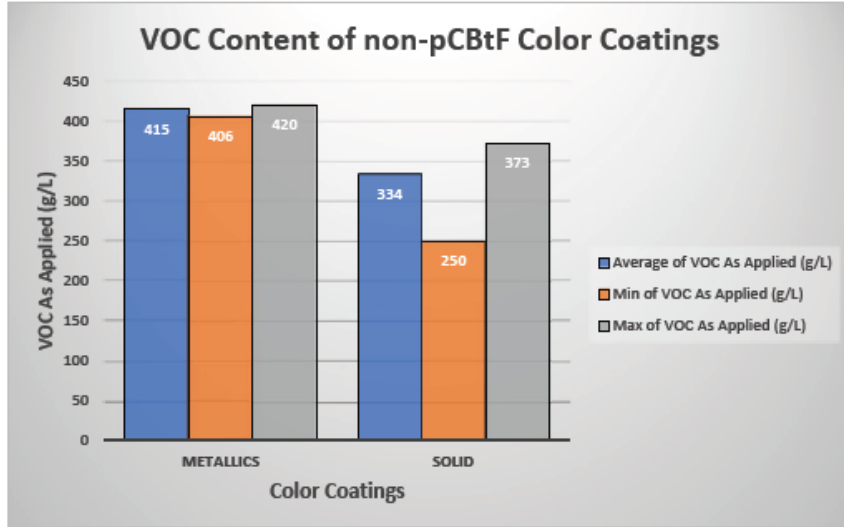
2. The definition for the category “Metallic Color Coating” should include color-matches that have other special effect pigment (pearl, mica, and metallic) due to the need for “lower solids” blends to achieve special effect pigment orientation control, for proper color match. We suggest a revision or removal of definition (19) METALLIC COLOR COATING, and the addition of the following definitions to section (c) Definitions for clarity:

(11) COLOR COATING means any pigmented Automotive Coating, excluding automotive Adhesion Promoters, and Primers, that require a subsequent Clear Coating, and which is applied over a Primer, Adhesion Promoter or Color Coating.

(19) SPECIAL EFFECT COLOR COATING means any Automotive Coating that contains any Special Effect Pigment, where such particles are visible in the dried film.

(32) SPECIAL EFFECT PIGMENTS are natural or synthetic pigments that create a visible shape, color, or gloss difference through the refraction and reflection of light inside the Color Coating. They include metal, mica, and other man-made pigments.

3. To ensure a timely removal of TBAC and PCBTF the Phase I VOC limit for “Metallic Color Coating” should be at the USA EPA 40 CFR part 59 subpart B limit of 600g/l VOC like you propose for the category Single-Stage Coating. The chart from the WMG#3 presentation page 14 (below) shows that “Special Effect Pigment” Color Coatings were not able to meet the current VOC limit of 420g/l without PCBTF. Moreover, 600g/l VOC is less than the true EPA limit because the EPA limit is an average of the Color Coating plus 2-times the Clear Coating divided by the number of coats. Most Color Coating color-matches without PCBTF are in the 600g/l to 800g/l range and the averaging with 2-times the Clear Coating brings the total average below the 600g/l VOC limit.



Color Categories	Number of Products
Metallic Color Coats	25
Solid Color Coats	314

Table 1- TABLE OF STANDARDS
Regulatory VOC Content Limits and Effective Dates

Coating Categories	Current Limits ⁽¹⁾		Phase I [Date of Rule Adoption]		Phase II		
	g/L	lb/gal	g/L	lb/gal	g/L	lb/gal	Effective Date
Adhesion Promoter	540	4.5	840	7.0	720	6.0	1/1/2028
Clear Coating	250	2.1	520	4.3	250	2.1	1/1/2030
Matte-Clear Coating	250	2.1	550	4.6	520	4.3	1/1/2030
Color Coating	420	3.5	420	3.5	250	2.1	1/1/2028
Metallic Color Coating	420	3.5					
Pretreatment Wash Primer	660	5.5	780	6.5			
Primer Sealer	250	2.1	580	4.8	250	2.1	1/1/2028
Primer Surfacer	250	2.1	550	4.6	250	2.1	1/1/2028
Single-Stage Coating	340	2.8	600	5.0	340	2.8	1/1/2028

4. Strongly recommend that the differences in VOC regulations for Automotive Refinish Coatings from other similarly regulated products be considered when creating requirements for QER.

Section (h)(4)(C) states the QER shall include the applicable Rule 1151 category.

Automotive refinish coating components often fall under multiple categories. It is unclear from the instructions in PAR 1151 if a single category is required or all the potential categories that the component may fall under. Recommend that if a component falls under multiple categories, the most restrictive category per subdivision (d)(2) be listed in the QER.

Section (h)(4)(E) states the QER shall include whether the product is waterborne or solvent-based.

There are no definitions provided in order to determine whether a coating should be considered waterborne or solvent-based. Recommend definitions of waterborne and solvent-based products be included in the Definitions section.

Section (h)(4)(F) states the QER shall include total annual volume sold into or within SCAQMD including products sold through distribution centers located within or outside the South Coast AQMD.

In other SCAQMD VOC rules which feature QERs and requirements to report volume sold into or within SCAQMD including products sold through distribution centers, there is a definition of distribution center and requirements for the distribution centers to also submit a QER to the regulated product manufacturer or private labeler. The data must be electronically submitted, in a specified format, and certified to be true and correct. The data must be submitted to the regulated product manufacturer four months before the reporting deadline for the manufacturer/private labeler QER. See Rule 1168 section (e)(4). This is the source of the data used by the manufacturer or private labeler in the QER they submit. Without the requirement of a QER from the distributor, the manufacturer or private labeler will not have access to the information needed to comply with the QER requirements in the initial draft PAR 1151. Recommend incorporating definition of distribution center and requirements for distribution centers to also submit a QER to the regulated product manufacturer or private labeler.

- (4) Big Box Retailer or Distribution Center QER
A big box retailer or distribution center shall submit a QER to the Regulated Product manufacturer or private labeler, according to the schedule in Table 2 and maintain records to verify all required data being reported for three years and make them available upon request by the Executive Officer. The QER must be electronically submitted, in a spreadsheet format and

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certified that all information reported is true and correct. The QER must contain the following information:

- (A) The manufacturer or private labeler's product name and code; and
 - (B) The quantity of each Regulated Product, aerosol adhesive, and aerosol adhesive primer distributed into the South Coast AQMD.
- (c) (5) QER Reporting Timeline

Section (h)(4)(H) requires for multicomponent Automotive Coatings, each line item shall report the information required pursuant to subparagraph (h)(4)(A) – (G) for all components mixed in the Ready-to-Spray Automotive Coatings, separated by a slash, and include the Actual VOC and Regulatory VOC content of the Ready-to-Spray Automotive Coating.

The requirement to use coatings that contain VOC below the limits specified in the Table of Standards falls on the person applying the coating per subdivision (d). The users of Ready-to-Spray Automotive Coating are the ones who mix the components therefore the manufacturers and distributors do not have this information to report.

For many Ready-to-Spray Automotive Coatings, there may be an unlimited number of component combinations that comply with the Table of Standards. Including the Actual VOC and Regulatory VOC content in the QER for each potential Ready-to-Spray coating mixture would be exhaustive and exceed most spreadsheet application limits and email attachment file sizes.

It is unclear whether the information pursuant to subparagraph (h)(4)(A) – (G) applies to each component of the mixture or the mixture as a whole. This needs to be further clarified.

Recommend that this requirement of the QER be removed. This type of information is typically obtained by inspectors during automotive refinishing facility inspections.