



September 13, 2024

Mr. Christopher Bradley
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

RE: South Coast Air Quality Management District Proposed Amended Rule 1151 – Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations

Dear Mr. Bradley:

The W.M. Barr & Company, Inc. appreciates the opportunity to comment on the South Coast Air Quality Management District (SCAQMD) proposed amendments to Rule 1151 Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations.

The W.M. Barr & Company, Inc. is a major supplier of Multi-purpose Solvents and Paint Thinners to the retail market under our Klean-Strip® brand. Our family of brands supports consumers in their efforts to maintain clean and well-maintained homes. We also support the automotive paint and body industry bringing our expertise in paint removal, surface preparation and adhesion promoter technologies to life through our Bulldog® and Klean-Strip Automotive® brands.

VOC Limits

W.M. Barr supports the proposed VOC limits for the Adhesion Promoter category for Phase I and Phase II. While the Phase II date of 1/1/2028 and VOC limit of 740 g/l will be challenging, W.M. Barr will make every effort to reformulate their product to meet this limit. W.M. Barr also suggests that an alternative future effective limit for Adhesion Promoters could be between 2.0 and 2.5 MIR. The use of Reactivity to control VOC emissions is a new and evolving Science Based alternative to Mass based VOC limits. MIR limits may provide a key pathway for meaningfully reducing ozone generation while maintaining optimal product performance. W.M. Barr encourages the district to expand its regulation into Reactivity VOC limits.

Definitions

W.M. Barr also supports changes to the definition of Adhesion Promoter. The new definition more clearly describes the use of this product category.

Phase I implementation

W.M. Barr appreciates the ability to sell product that complies with the US EPA National VOC limits for the Adhesion Promoter in the first phase so that there is time to reformulate out of the compound tert-Butyl acetate (t-BAc). This reformulation period will allow the paint and body shops to have access to a product that supports appropriate paint adherence, preventing unnecessary additional paint repairs and VOC releases, while quickly reducing t-BAc usage.

W.M. Barr & Company, Inc.

1715 Aaron Brenner Dr, Suite 600, Memphis, TN 38120

www.wmbarr.com



Currently the US EPA National VOC labeling does not require the wording in section (h)(2)(A)-(B). W.M. Barr will be quickly making label changes to send product into the Air Quality Management District that is correctly labeled in accordance with section (h)(2)(A)-(B), but it will be difficult to ensure that older stock produced without the need for this terminology does not enter the channels of trade. We appreciate that section (k)(5) provides some relief, but respectfully the sales allowance for US EPA Nationally labeled product be applied for at least nine months or preferably one year to allow time for Rule 1151 Phase 1 compliant product without this specific label language to move through our distribution network. W.M. Barr supports the comments of the America Coatings Association as it relates to this issue.

Summary

W.M. Barr & Company, Inc. supports the staff proposal for the VOC limits and dates for the Adhesion Promoter. Likewise, W.M. Barr supports the definition change for the Adhesion Promoter category. Our company is respectfully requesting sales allowances for US EPA Nationally labeled product be extended to nine months or one year instead of six months as currently proposed.

W.M. Barr & Company, Inc would like to thank the staff for all their hard work. As well for the staff's willingness to engage in discussions on the proposed amendments and meet with us to iron out differences. Any questions or comments feel free to contact our consultant Doug Raymond at 440-339-4539 or at djraymond@me.com.

Sincerely,

Amanda Burwell

Amanda Burwell, M.P.H
Director of Regulatory Affairs | W.M. Barr
C: (901) 426-0958
1715 Aaron Brenner Dr. | Suite 600 | Memphis, TN 38120
www.wmbarr.com

cc: Heather Farr
cc: Doug Raymond