Proposed Amended Rule 1107: Coating of Metal Parts and Products (PAR 1107)

Proposed Amended Rule 1124: Aerospace Assembly and Component Manufacturing Operations (PAR 1124)

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

Working Group Meeting #3 December 10, 2024

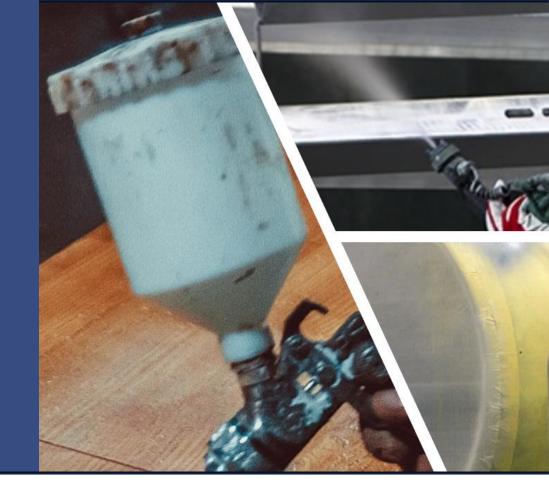


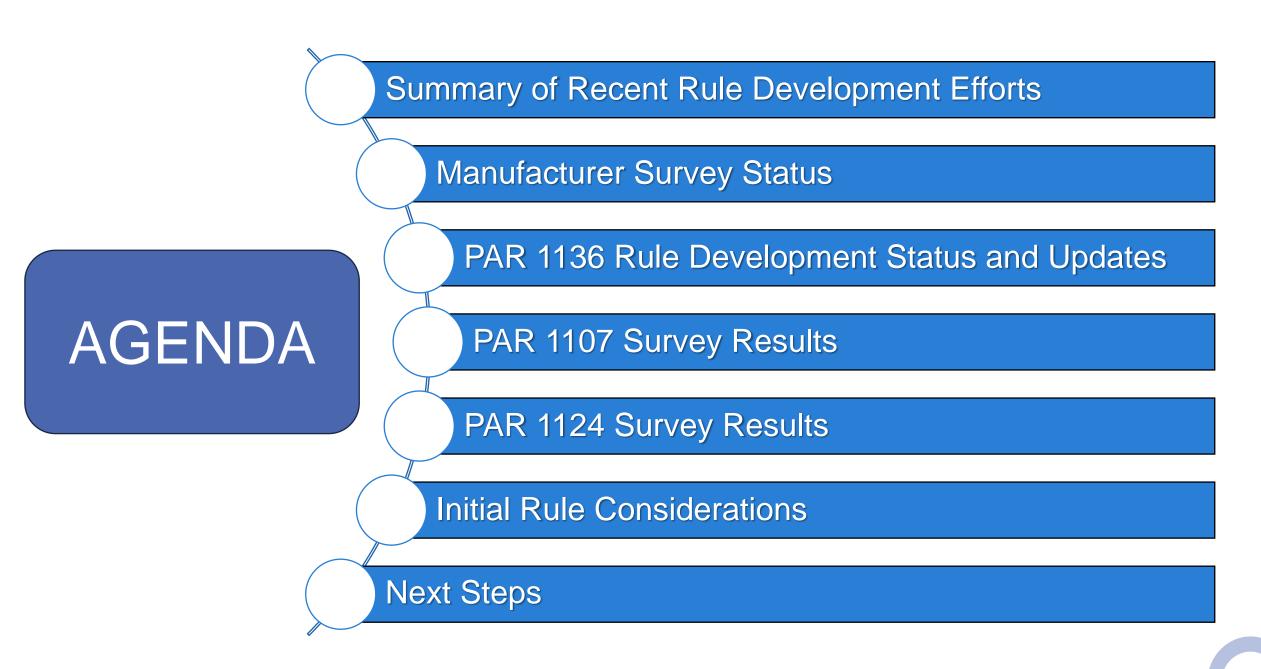
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Summary of Recent Rule Development Efforts Summary of Working Group Meeting (WGM) #2

WGM#2 focused on the coating manufacturer survey including:

- Survey purpose and instructions
- Response timeline

Rule Development Progress Since WGM #2

- Staff conducted five additional site visits
- Met with three coatings manufacturers
- Received and analyzed Coating Manufacturer Survey Data

Site Visits and Manufacturer Meetings

Staff conducted nine site visits in total across various industries

Business Sector	Applicable Rule
Metal Coating	1107
Aircraft Parts/Equipment	1124
Aircraft Manufacturing	1107/1124
Amusement and Recreation Services	1107/1136
Special dies, tools, jigs and fixtures	1107
Musical Instruments	1136
Motion Picture Production	1107/1136
Commercial Airline Operations	1124
Search and Navigation Equipment	1107/1124

Met with coating manufacturers to discuss

- Clarification on coating
 manufacturer survey data
- Extent of pCBtF and t-BAc* usage within a specific industry
- Challenges with prohibition of pCBtF and t-BAc

*t-BAc is not exempt from the definition of a VOC for Rules 1107, 1124 and 1136 and is considered a VOC



Manufacturer Survey Status



Coating Manufacturer Survey Status

 The survey was distributed on August 7, 2024

Responses were requested by October 22, 2024

- Assess extent of pCBtF and t-BAc use and propose a feasible prohibition timeline
- Assess potential VOC reductions

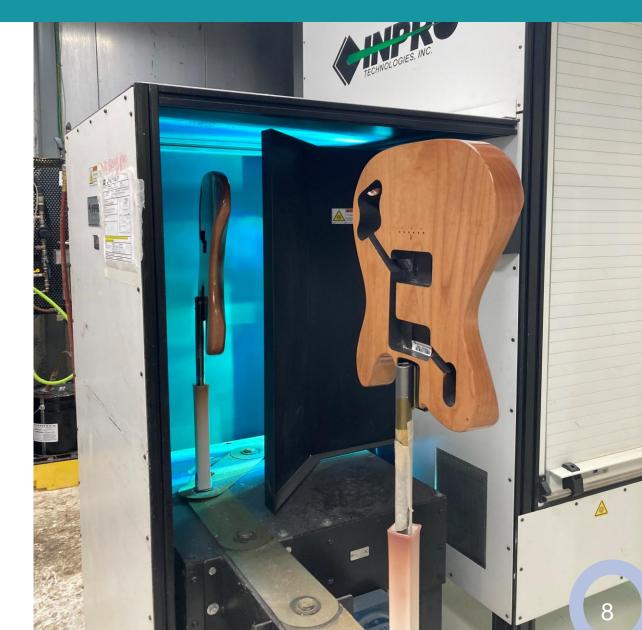
- Staff received responses from four manufacturers
 - Three survey responses for PAR 1107
 - Three survey responses for PAR 1124
 - Three survey responses for PAR 1136
- Staff encourages any remaining manufacturers to provide survey responses as soon as possible so staff has time to properly evaluate new data



PAR 1136 Rule Development Status and Updates

PAR 1136 Update and Site Visits

- Due to staffing resources, PAR 1136 rule development will be temporarily delayed and resume second quarter 2025
- Conducted site visits at two wood coating operations:
 - Guitar manufacturing facility
 - Movie and television production studio
- One facility complying with the rule with pollution control equipment



PAR 1136 Initial Survey Assessment

- Staff received responses from three manufacturers for PAR 1136
- 32% of products reported use pCBtF in formulation
- t-BAc not used in wood coating products
- Survey assessment ongoing, additional information will be presented at future working group meeting

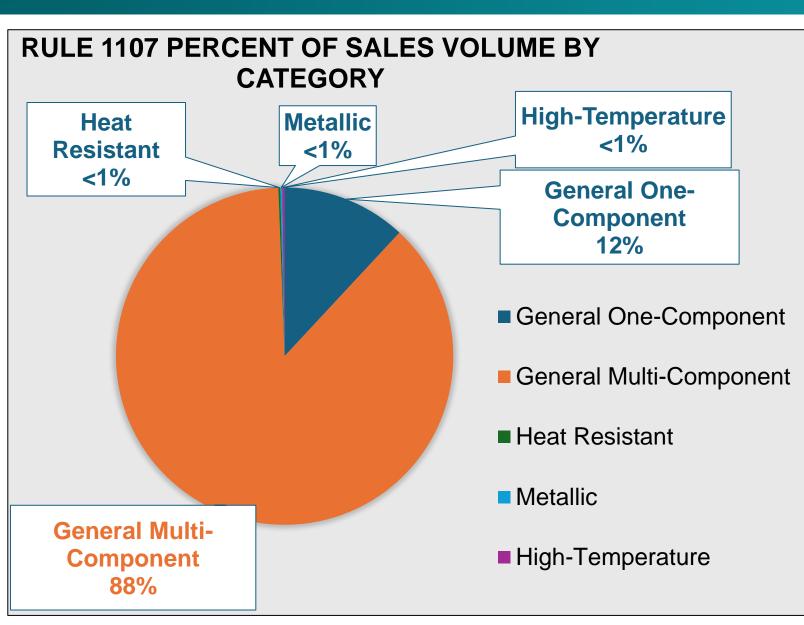
Initial Summary of Survey Data Submitted for PAR 1136

Number of Products reported in Surveys for 1136	442
Percent Solvent-based	73% to 100%
Number of Products Containing pCBtF	141
Range of Percent pCBtF Content	8% to 50%
Number of Products with t-BAc	0

PAR 1107 Survey Results



Overview of PAR 1107 Manufacturer Survey Data



Coatings can be made up of multiple components including but not limited to hardeners, thinners, and the coating base

Two of the three manufacturer surveys reported data for individual components

One survey reported data on coatings with all components included

Staff is still evaluating the extent of pCBtF and/or t-BAc in each coating category

Rule 1107 Coating Categories Reported

Rule 1107 Coating Categories		
General One-Component		
General Multi-Component		
Military Specification		
Etching Filler		
Solar-Absorbent		
Heat-Resistant		
Extreme High-Gloss		
Metallic		
Extreme Performance		
Prefabricated Architectural One-Component		
Prefabricated Architectural Multi-Component		
Touch Up		
Repair		
Silicone Release		
High-Performance Architectural		
Camouflage		
Vacuum-Metalizing		
Mold-Seal		
High-Temperature		
Electric-Insulating Varnish		
Pan Backing		
Pretreatment Coatings		

- Five coating categories were reported to be sold in the manufacturer surveys:
 - General One-Component
 - General Multi-Component
 - Heat-Resistant
 - Metallic
 - High-Temperature
- Out of the 22 coating categories in Rule 1107, only four were reported to contain pCBtF and/or t-BAc
- The results of the manufacturer survey do not indicate sales for 17 of the Rule 1107 coating categories in South Coast AQMD
- Staff plans to continue rule development under the assumption that pCBtF and t-BAc can be phased out of these categories with no issues

Definitions for The Reported in the Manufacturer Survey

- General one-component: coatings that are ready for application as they comes out of their container to form an acceptable dry film (thinners are not considered components)
- General multi-component: coatings requiring the addition of a separate reactive resin, commonly known as a catalyst or hardener, before application to form an acceptable dry film
- Heat-resistant: coatings that must withstand a temperature of at least 400°F during normal use
- **Metallic:** coatings which contains more than 5 grams of metal particles per liter of coating, as applied
- High-temperature: coatings that are certified to withstand a temperature of 1000°F for 24 hours

VOC limits for coating categories in Rule 1107 are separated into baked and air-dried coatings

Air-dried coatings are cured below 90°C (194°F), baked coatings are cured at 90°C (194°F) or above

General One-Component

- Current Rule 1107 General One-Component emission limits:
 - Baked 275 g/L regulatory VOC, as applied
 - Air-dried 275 g/L regulatory VOC, as applied
- 67 coatings were reported, and all are air-dried
 - ~12% contain pCBtF and/or t-BAc
 - ~15% of the sales volume contains pCBtF and/or t-BAc
- Of the 60 non-pCBtF and/or t-BAc containing general onecomponent coatings, approximately 85% of the sales volume has a regulatory VOC as applied of 227 g/L or lower
- Staff is continuing to analyze the survey data provided to assess if there are potential opportunities for VOC reductions



General Multi-Component

- Current Rule 1107 General Multi-Component emission limits:
 - Baked 275 g/L regulatory VOC, as applied
 - Air-dried 340 g/L regulatory VOC, as applied
- 359 components were reported, and all are air-dried
 - ~40% contain pCBtF and/or t-BAc*
- Based on the initial survey results there are 62 general multicomponent coatings that do not contain pCBtF and/or t-BAc
- Staff is continuing discussions with manufacturers to determine the extent of pCBtF and/or t-BAc in each product line
- Staff is continuing to analyze the survey data provided to assess if there are potential opportunities for VOC reductions

*Note that general multi-component coatings are made up of multiple components which can make the entire coating system contain pCBtF and/or t-BAc



Heat-Resistant

- Current Rule 1107 Heat Resistant emission limits:
 - Air-Dried 420 g/L regulatory VOC, as applied
 - Baked 360 g/L regulatory VOC, as applied
- Five components were reported, and all are airdried
 - Only one contains pCBtF*
- Staff is currently in discussions with manufacturers regarding the survey data provided to assess if there are potential opportunities for VOC reductions

*Note that heat-resistant coatings are made up of multiple components which can make the entire coating system contain pCBtF



Metallic

- Current Rule 1107 Metallic emission limits:
 - Air-Dried 420 g/L regulatory VOC, as applied
 - Baked 360 g/L regulatory VOC, as applied
- Two components were reported, both are air-dried
 - Both contain pCBtF
- While both reported coatings contain pCBtF, the manufacturer indicated that there are suitable nonpCBtF containing metallic coatings available for sale
- Staff is continuing discussions with manufacturers to determine the VOC content of the non-pCBtF containing metallic coatings



High-Temperature

- Current Rule 1107 Metallic emission limits
 - Air-Dried 420 g/L regulatory VOC, as applied
 - Baked 420 g/L regulatory VOC, as applied
- Four components were reported, all are air-dried
 - None contain pCBtF or t-BAc
- Based on the initial survey data the hightemperature coating category contains ready to use alternatives and early prohibition may be feasible
- Staff is continuing to analyze the survey data provided to assess if there are potential opportunities for VOC reductions



Initial PAR 1107 Take-Aways

Unless additional data indicates otherwise, staff will assume pCBtF is not needed to comply with VOC limits for the 17 unreported categories and early prohibition may be feasible

Initial survey data indicates the general-one component coating category contains ready to use alternatives to pCBtF and/or t-BAc, more analysis is needed for the following coating categories:

General multi-component

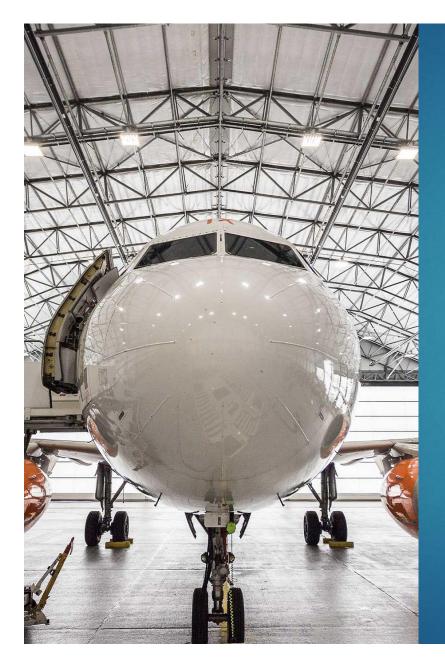
Heat-resistant

Metallic

Staff is reaching out to the two manufacturers that submitted surveys reporting individual components to determine the extent of pCBtF and/or t-BAc in their product lines

Staff is working with stakeholders to determine the appropriate sell through and use through timelines





PAR 1124 Survey Results

Overview of Rule 1124 Categories and Subcategories

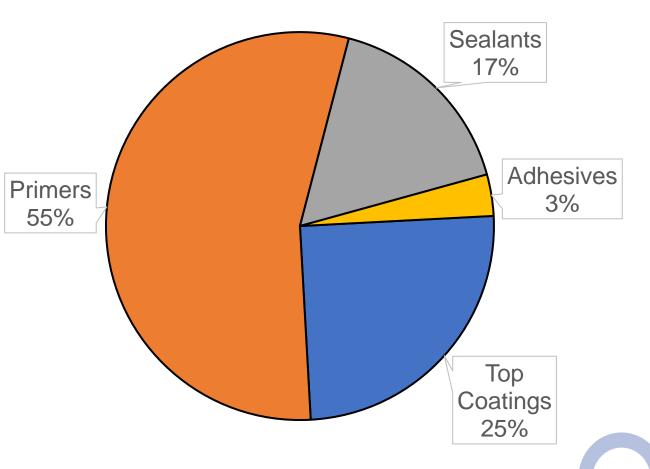
- Rule 1124 establishes VOC limits for materials used in the aerospace industry
 - Broader than most coating rules
 - Regulates 8 primary categories with a total of 55 subcategories
- Current VOC limits range from 50 to 1,000 g/L, depending on category

Aerospace Material Category	Number of Subcategories	VOC Content Limit Range (g/L)
Primers	11 Subcategories	250-850
Top Coatings	24 Subcategories	250-1000
Adhesives	5 subcategories	50-850
Sealants	3 subcategories	280-675
Maskants	5 subcategories	160-850
Lubricants	7 subcategories	120-880
Cleaning Solvents	No subcategories	200
Strippers	No subcategories	300

Overview of Manufacturer Survey Data

- Manufacturers reported a total of 349 aerospace products sold in South Coast AQMD
- Reported aerospace products were in four of the eight primary categories:
 - Primers: 94 products, ~29,500 gallons
 - Top Coatings: 60 products, ~13,300 gallons
 - Adhesives: 82 products, ~1,800 gallons
 - Sealants: 113 products, ~ 8,900 gallons
- pCBtF reported in 3 out of 4 primary categories
 - Primer, top coating, and sealant category
 - None reported in adhesives
- t-BAc only reported in top coating categories

Percentage of Sales Volume Reported by Category in South Coast AQMD



Overview of Manufacturer Survey Data (cont.)

- Reported products fall into 9 subcategories:
 - General primers
 - Adhesion promoters
 - Topcoats
 - High-temperature coatings
 - Fuel tank coatings
 - Autoclavable adhesives
 - Non-autoclavable adhesives
 - Non-Structural adhesives
 - Extrudable, rollable, or brushable sealants
- No products reported for following categories:
 - Maskants
 - Lubricants
 - Cleaning solvents
 - Strippers

Primary Category	Number of Products	Applicable Subcategories
Primers	94 Products	General Primers and Adhesion Promoters
Top Coatings	60 Products	Topcoats, High- Temperature, and Fuel Tank
Adhesives	82 Products	Structural (Autoclavable, Non-autoclavable), and Non-Structural
Sealants	113 Products	Extrudable, Rollable, or Brushable
Maskants		
Lubricants		
Cleaning Solvents		
Strippers		

Primer Subcategories - Overview and Background

- Primer category consist of 11 subcategories:
 - General primer category
 - 10 specialized primer categories
- Two primer subcategories reported in survey
 - General primers and adhesion promoters
- General primers coatings provide protection from environment, prevent corrosion, and adhesion of subsequent coatings, adhesive, or sealants
- Adhesion promoters used to promote wetting and form chemical bind with subsequent sealants or rubber-like materials
- Remaining nine primer subcategories not reported in survey

Primer Subcategories	VOC Limit (g/L)
General Primer	350
Low-Solids Corrosion Resistant Primer	350
Pretreatment Primer	780
Rain Erosion-Resistant Coating Compatible Primer	850
Adhesion Promoter	250
Adhesive Bonding Primer	
New Commercial Aircraft	250
All Military Aircraft	805
Remanufactured Commercial Aircraft Parts	805
Sonic and Acoustic Applications	805
Adhesive Bonding Primer	
Long Term	250
Short Term	250

Primer Subcategory Survey Summary

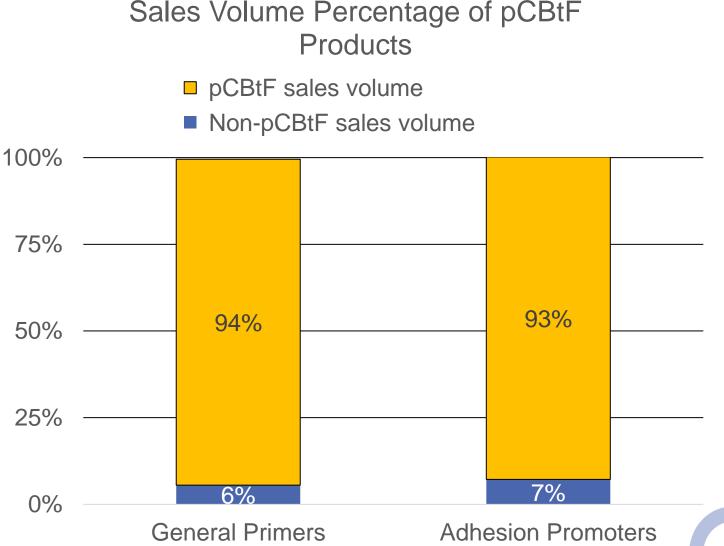
General Primers

- Largest sales volume reported
- 51% of products contain pCBtF
- No products contain t-BAc
- Adhesion Promoters
 - Low sales volume
 - ~70% of products contain pCBtF
 - No products contain t-BAc

	General Primers	Adhesion Promoters
Number of Products Reported	74 Products	20 Products
Percent of Total Category Sales Volume in South Coast	~98%	~2%
Percent of Product Solvent- Based	~74%	~85%
Percent of Product Water- Based	~26%	~15%
Percent of Product Containing pCBtF	~51%	~70%
Percent of Product Containing t-BAc	0%	0%

Survey Data – Sales Volume of pCBtF and Non-pCBtF Primers

- General Primers
 - 38 out of 74 reported products contain no pCBtF or t-BAc
 - ~1,600 gallons out of the total ~29,000 gallons in the subcategory do not contain pCBtF or t-BAc
- Adhesion Promoters
 - Six out of 20 reported products contain no pCBtF or t-BAc
 - ~36 gallons out of the total ~500 gallons in the subcategory are free of these solvents



Primer Category Initial Take-Aways

- Majority of general primers sold contain pCBtF
 - No product reported contained t-BAc
- Majority of adhesion promoters contain pCBtF, but have low sales volume
- Staff will assume pCBtF is not needed to meet VOC limits for the nine primer categories that were not reported
 - Indicates early prohibition of pCBtF and t-BAc feasible
- Will need to evaluate:
 - Availability of old formulations before pCBtF exemption
 - Performance requirements and standards (military specifications)
- Further evaluations and discussions needed
- Staff will continue collaborating with manufacturers to explore alternatives/old formulations in this category



Coating Subcategories - Overview and Background

- Consists of 24 subcategories
- Three coating subcategories reported in survey
 - Topcoats, high-temperature coatings, and fuel tank coatings
- Topcoats: coatings applied over primers to provide a desired appearance, identification, or protection
- High-Temperature Coatings: Coatings that can withstand temperatures over 350°F

Coating Subcategories	VOC limits (g/L)
Topcoat	420
Clear Topcoat	520
Unicoat	420
Wing Coating	750
Impact Resistant Coating	420
High-Temperature Coating	850
Antichafe Coating	420
Rain Erosion-Resistant Coating	800
Conformal Coating	750
Optical Anti-Reflective Coating	700
Scale Inhibitor Coating	880
Metalized Epoxy Coating	700
Electric or Radiation Effect Coating	800

Coating Subcategories - Overview and Background (Cont.)

 Fuel tank coatings: Specialized coatings applied to the fuel tank of an aircraft for protection against corrosion and/or bacterial growth

Coating Subcategories	VOC limits (g/L)	
Temporary Protective Coating	250	
Fuel Tank Coatings	420	
Mold Release Coatings	780	
Flight Test Coating		
Used on Missiles or Single Use Target Craft	420	
All Other	840	
Fire Resistant Coatings		
Commercial	650	
Military	800	
Wire Coatings		
Phosphate Ester Resistant Ink	925	
Other	420	
Space Vehicle Coatings		
Electrostatic Discharge Protection Coating	800	
Other	1000	

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Topcoat and High-Temperature Coatings Survey Summary

Topcoats

- Largest sales volume reported
- ~71% of products contain pCBtF
- ~22% of products contain t-BAc
- High-Temperature Coatings:
 - · Low sales volume reported
 - No products contain pCBtF
 - No products contain t-BAc

	Topcoats	High-Temp Coatings
Number of Products Reported	55 Products	1 Product
Percent of Total Category Sales Volume in South Coast	~97%	~2%
Percent of Product Solvent- Based	100%	100%
Percent of Products Water- Based	0%	0%
Percent of Product Containing pCBtF	~71%	0%
Percent of Product Containing t-BAc	~22%	0%

Fuel Tank Coatings Survey Summary

- Fuel Tank coatings:
 - Low Volume Sales Reported
 - ~25% of products contain pCBtF
 - 0% of products contain t-BAc

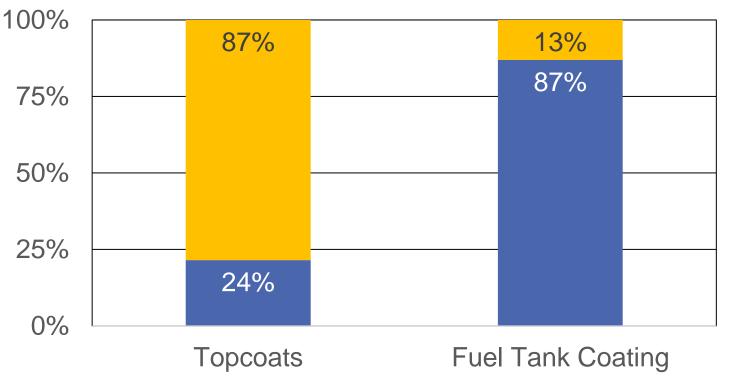
	Fuel Tank Coatings
Number of Products Reported	4 Products
Percent of Total Category Sales in South Coast	~1%
Percent of Product Solvent- Based	100%
Percent of Product Water-Based	0%
Percent of Product Containing pCBtF	~25%
Percent of Product Containing t-BAc	0%

Survey Data – Sales Volume of pCBtF and Non-pCBtF

- Topcoats
 - Five out of 55 products contain no pCBtF or t-BAc
 - ~3,060 gallons out of the total ~
 12,900 gallons in the subcategory have no pCBtF or t-BAc
- Fuel tank coating:
 - Three out of four reported products contain no pCBtF or t-BAc
- High-Temperature coating product reported contains no pCBtF or t-BAc

Sales Volume Percentage of Non-pCBtF/t-BAc Products

- pCBtF/t-BAc sales volume
- Non-pCBtF/t-BAc sales volume



Coating Category Initial Take-Aways

- Potential for quick phase-out of pCBtF and t-BAc in High-Temperature and Fuel Tank Coatings subcategories
 - Majority of sales volume in Fuel-Tank coating subcategory contains no pCBtF or t-BAc
- Staff will assume pCBtF and t-BAc not needed to meet VOC limits for the 21 coating subcategories not reported
 - Indicates early prohibition of pCBtF and t-BAc feasible
- Will need to consider:
 - Potential alternative product availability and timeline for transition
 - Military specifications and aerospace standards
 - Performance and operational requirements
- Staff will continue collaborating with manufacturers to explore alternatives in this category



Adhesive Subcategories - Overview and Background

- Consists of five subcategories
- Three adhesive subcategories were reported
 - Structural adhesive (autoclavable), structural adhesive (non-autoclavable), and non-structural adhesives
- Structural adhesive (autoclavable): Adhesive designed to bond load-carrying aircraft components and withstand autoclave heat and pressure curing conditions
- Structural adhesive (non-autoclavable): Adhesive cured under ambient conditions, used to bond load-carrying aircraft components or other critical functions
- Non-structural Adhesives: Adhesive that bonds non-load-carrying aircraft components in non-critical applications

Adhesives Subcategories	VOC limits (g/L)
Non-Structural Adhesive	250
Structural Adhesive	
Autoclavable	50
Non-Autoclavable	850
Space Vehicle Adhesive	800
Fuel Tank Adhesive	620

Structural Adhesives (autoclavable and non-autoclavable) from Survey

• St	tructural	adhesive	(autoclavable):
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- Low sales volume reported
- 0% of products contain pCBtF
- 0% of products contain t-BAc
- Structural adhesive (nonautoclavable):
 - Largest sales volume of category
 - 0% of products contain pCBtF
 - 0% of products contain t-BAc

	Structural (autoclavable)	Structural (non-autoclavable)
Number of Products Reported	6 Products	65 Products
Percent of Total Category Sales in South Coast	~6%	~86%
Percent of Product Solvent-Based	100%	100%
Percent of Product Water-Based	0%	0%
Percent of Product Containing pCBtF	0%	0%
Percent of Product Containing t-BAc	0%	0%

Non-Structural Adhesives from Survey and General Take-Aways

• Non-structural Adhesives:

- · Low sales volume reported
- 0% of products contain pCBtF
- 0% of products contain t-BAc
- All adhesives reported in survey contain no pCBtF or t-BAc in formulations
 - Early prohibition date feasible for this category

	Non-Structural	
Number of Products Reported	11 Products	
Percent of Total Category Sales in South Coast	~9%	
Percent of Product Solvent- Based	100%	
Percent of Product Water- Based	0%	
Percent of Product Containing pCBtF	0%	
Percent of Product Containing t-BAc	0%	

Sealant Subcategories Overview and Background

Sealants Subcategories	VOC limits (g/L)
Fastener Sealant	675
Extrudable, Rollable or Brushable Sealant	280
Other	600

- One sealant subcategory was reported
 - Extrudable, Rollable, and Brushable sealants
- Extrudable, Rollable, and Brushable sealants: Sealants used for sealing gaps, joints, and surfaces in aerospace structures to seal out water, fuel, and other liquid and solids, ensuring protection and integrity

Sealant Categories from Survey and General Take-Aways

- All sales of sealants reported are in the Extrudable, Rollable, and Brushable subcategory
 - ~2% of products contain pCBtF
 - No product contains t-BAc
 - 111 of 113 products reported contain no pCBtF or t-BAc
 - ~8,700 gallons out of the total ~8,900 gallons in the subcategory contain no pCBtF or t-BAc
- Potential for quick phase-out of pCBtF and t-BAc

	Extrudable, Rollable, and Brushable		
Number of Products Reported	113 Products		
Percent of Total Sales in South Coast	100%		
Percent Solvent- Based	56%		
Percent Solvent Free (etc. Semi-Solid)	44%		
Percent Containing pCBtF	~2%		
Percent Containing t-BAc	0%		

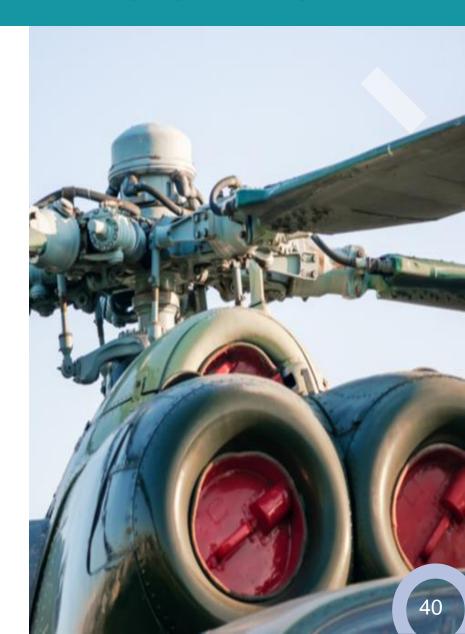
PAR 1124 Initial Take-Aways From Survey

- t-BAc not widely used in aerospace materials sold in the South Coast AQMD
 - Early prohibition date feasible for categories that reported no t-BAc usage
- Staff will assume pCBtF is not needed to comply with VOC limits for following categories:
 - Maskants, lubricants, cleaning solvents, and stripper categories
 - Not reported in survey
 - Adhesives
 - Products reported do not contain pCBtF or t-BAc in formulations
 - Early prohibition date feasible for categories
- pCBtF mainly found in the primer and coating categories
 - Primer category is largest sales volume (55%)
 - Coating category is the second largest sales volume (25%)



PAR 1124 Initial Take-Aways From Survey (cont.)

- Current VOC limits for some categories lowered during 2001 rule amendment
 - pCBtF exempted in 2014
 - Reformulation with pCBtF not necessary to meet current VOC limits
 - Older formulations potentially available as replacements
- Staff will continue working with stakeholders to:
 - Identify availability of potential alternatives or replacements
 - Understand performance standards for material category
 - Evaluate appropriate phase out/prohibition timelines along with sell-through and use-through timelines



Initial Rule Considerations



Staff is evaluating each rule and category for feasible options to phase out pCBtF and t-BAc as soon as practical

Initial Rule Considerations



Staff recognizes the individual needs for each rule and is considering each requirement to determine feasible phase out timelines and potential changes to VOC limits

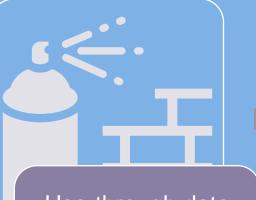


Staff is collaborating with stakeholders to further evaluate the survey data

Phase Out Approach Considerations

• Staff is considering step by step phase out with multiple dates

Manufacturing prohibition is the date manufacturers must stop producing pCBtF/t-BAc-based coatings for sale into South Coast AQMD Sell-through date allows coating manufacturers time to sell products manufactured prior to prohibition date already in the supply chain



Use-through date allows end users time to use remaining products purchased before the prohibition takes effect After the usethrough date there is a complete onsite

is a complete onsite prohibition of pCBtF and t-BAc containing products

- Proposed approach includes provisions to address the time needed to use existing inventory
 - Addresses coating manufacturers, distributers, and end users

Next Steps



Future Working Group meetings will be specific to individual rules



Release draft rule language



Continue meeting with individual stakeholders and conduct additional Working Group meetings



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	This page include	s a list of rules that are	e actively in rule d	development	t or have rec	ently
Guide to South Coast AQMD Rules	This page includes a list of rules that are actively in rule development or have recently been proposed and/or amended.					
Archived	Information roga	we want to a We date of Course Man Marco Dublic We debugs and supporting				
Recent Actions	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.				e.	
		e South Coast AQMD F	Rule Book to obta	in the currer	nt list of ado	pted
	or amended rules	and regulations.				
	For current rule f	precast please see the	monthly Governi	ing Board Age	enda.	
	Rule Name	Description				
	Regulation III	Fee Rules				
	Rule 218.2 and Rule 218.3	Proposed Rule 218.2 - General Provisions Proposed Rule 218.3 - Performance Specificat	Continuous Emissi	-		

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	 Events & Conferences 	List of stakeholders interested in events and conferences.				
	Environmental Justice Conference	Interest in attending a South Coast AQMD EJ Conference (More Information - TBD)	1			
Rule Updates:		Brief undates hinhlighting what is current at South Coast AOMD, such as				
Rule 1124	Aerospace A	Assembly and Component Manufacturing Operations				
□ Rule 1130	Graphic Arts	5				
□ Rule 1132	Further Con	trol of VOC Emissions from High-Emitting Spray Booth Fac	cilities			

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Rule	1107	1124	1136	
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