



AmericanCoatings

ASSOCIATIONSM

August 8, 2025

Governing Board & Stationary Source Committee
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

RE: South Coast Air Quality Management District (SCAQMD) Working Group Meeting to Discuss Proposed Amendments to 12 VOC Rules; ACA Comments

Dear Distinguished Members of the SCAQMD Governing Board:

The American Coatings Association (ACA) submits the following comments to SCAQMD regarding its upcoming working group meeting to discuss proposed amendments to 12 VOC rules. 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. ACA appreciates the opportunity to comment and looks forward to working with SCAQMD throughout the rule development process.

1. SCAQMD's decision to schedule a working group meeting within a two-week timeframe that includes a discussion of 12 different VOC rules is unfair.

On July 29, 2025, SCAQMD announced that it will hold a working group meeting to discuss proposed amendments to 12 VOC rules. The working group meeting is scheduled for August 12, 2025, at 10:30 AM PT (1:30 PM ET). According to the notice, the District plans to provide background information and key rulemaking objectives for the following rules:

- Rule 1106 – Marine and Pleasure Craft Coatings
- Rule 1113 – Architectural Coatings
- Rule 1122 – Solvent Degreasers
- Rule 1125 – Metal Container, Closure, and Coil Coating Operations
- Rule 1126 – Magnet Wire Coating Operations
- Rule 1128 – Paper, Fabric, and Film Coating Operations
- Rule 1130 – Graphic Arts
- Rule 1130.1 – Screen Printing Operations
- Rule 1143 – Consumer Paint Thinners & Multi-Purpose Solvents
- Rule 1144 – Metalworking Fluids and Direct-Contact Lubricants
- Rule 1145 – Plastic, Rubber, Leather, and Glass Coatings
- Rule 1162 – Polyester Resin Operations

The number of rules included in this working group meeting and rulemaking effort is unconscionable. ACA and its members have demonstrated sincere willingness to engage in rule development processes in

California and the South Coast. This is evidenced by ACA's engagement in SCAQMD's recent rulemakings regarding Rule 1168, Rule 1151, and Rule 1171. However, in this instance, it will be nearly impossible for industry to engage effectively given the sheer number of rules included in this effort. Industry members may be subject to multiple rules on this list, which means they must manage multiple rulemaking processes at once. These 12 rules encompass definitions, standards, and reporting/labeling/administrative requirements for countless coatings categories. This is unduly burdensome and will prevent productive discussion on the proposed amendments to these VOC rules.

Furthermore, SCAQMD's decision to schedule a working group meeting with two weeks' notice places an unreasonable burden on industry. Beyond the short period of time that regulated entities will have to review the 12 VOC rules prior to the working group meeting, it is also peak vacation time for the summer. As such, numerous regulated entities may not even be aware of SCAQMD's announcement and/or be able to attend the working group meeting on such short notice.

2. SCAQMD's decision to prohibit the use of PCBTF and TBAC will impact nearly every aspect of the amended rules, and it will take time to discuss, consider, and implement the necessary regulatory changes.

While the main purpose of the amendments to these 12 rules is to phase out the use of PCBTF and TBAC, there will be significant changes to most (if not all) provisions in each of the rules. This was clearly evident in SCAQMD's recent amendments to Rule 1168 (Adhesive and Sealant Applications) and Rule 1151 (Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations). The amendments to both of those rules resulted in a total revamp of the regulatory language, standards, and administrative requirements. Accordingly, the impact to other rule provisions must be openly acknowledged and accounted for by SCAQMD.

It is clear that the District intends to prohibit the use of PCBTF and TBAC as quickly as possible, but this action plan of addressing all 12 VOC rules at once during this working group meeting is infeasible and will make it impossible for industry to provide accurate feedback. ACA has serious concerns about the District's ability to ensure that the amendments to the rules are done appropriately and reasonably. Indeed, ACA's concerns extend to the public, SCAQMD, industry, and all other interested stakeholders. For industry, the removal of the ability to use PCBTF and TBAC results in significant burdens to reformulate its products for sale and use in the South Coast basin. It is important to note that necessary time will be required to scale-up new inventory and update internal systems, logistics, and distribution networks to ensure compliance with new rule provisions and requirements. The impact on industry goes above and beyond a simple removal of these compounds. ACA understands SCAQMD's urgency, but it takes time for all interested stakeholders to discuss, consider, and ultimately implement regulatory changes.

3. ACA recommends SCAQMD approach these 12 VOC rulemakings individually so that the work is completed with adequate attention from all stakeholders.

SCAQMD currently has several open rulemakings, including PAR 1107 and PAR 1124. In addition, District staff decided late last year to delay the rule development process for PAR 1136 due to limited resources. To add 12 more rules to its existing workload is incomprehensible.

Moreover, ACA expects SCAQMD to follow the same process it has in previous rulemakings by issuing a survey for industry to complete for each rule by category. Historically, the intent of these surveys was to

assist SCAQMD in understanding the extent to which PCBTF and TBAC were used to formulate compliant products. The survey results were used to help guide SCAQMD in evaluating VOC content limits and proposing PCBTF and TBAC prohibition timelines (including sell-through and use-by provisions). This is important information that should be the basis to make informed decisions, but to solicit data on 12 different rules all at once or in short succession is unreasonable and extremely burdensome for industry. ACA urges SCAQMD to alter its approach and proceed with one rulemaking at a time.

Thank you for your consideration of ACA's comments. Please do not hesitate to contact us if you have any questions or require additional clarification.

Sincerely,



Rhett Cash
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Annebelle Klein
Environmental Policy Counsel, Government Affairs

Submitted via email