

EL DORADO COUNTY AIR QUALITY MANAGEMENT DISTRICT

STAFF REPORT

PROPOSED AMENDMENTS TO:

RULE 215 – ARCHITECTURAL COATINGS

RULE 101 – GENERAL PROVISIONS & DEFINITIONS

June 2017



Prepared by: Adam Baughman
Air Quality Engineer

Approved by: Dave Johnston
Air Pollution Control Officer

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EXECUTIVE SUMMARY

On June 20, 2017 the El Dorado County Air Quality Management District (AQMD) Board of Director's will consider the adoption of the proposed amended Rule 215-Architectural Coatings. The Rule affects architectural coating (paint) sellers and contractors at the point of sale within El Dorado County. The affected sources include the following within the District: manufacturers, distributors, retailers, importers, paint contractors, construction workers, maintenance staff, and public works personnel. This includes many retailers within the District and within the vicinity of the District, as well as anyone providing coatings for use in the District.

The purpose of the amendments to the Rule are to fulfill a State Implementation Plan (SIP) commitment made by AQMD to continue progress toward achieving the federal 8-hour ozone standard. AQMD proposes to align Rule 215 with the Suggested Control Measure (SCM) adopted by the state in 2007. The SCM was developed by the California Air Resources Board (ARB) as a "model rule" that local districts can use when developing or updating their architectural coatings rules. The SCM, originally adopted by ARB in 1989, was amended in 2000 and most recently in 2007. Reductions in district-wide emissions of Volatile Organic Compounds (VOC) are expected as a result of the proposed amendments.

The proposed amendments to the Rule will have neither a significant nor a detrimental effect on the environment. Therefore, staff has prepared a Notice of Exemption to satisfy the requirements of the California Environmental Quality Act (CEQA). The notice states that the revisions to the Rule are exempt from the requirements of CEQA pursuant to CEQA Guidelines Section 15308, Actions by Regulatory Agencies for Protection of the Environment.

Additionally, some portions of Rule 101 General Provisions and Definitions are being proposed to update the list of VOC exempt compounds and to make minor edits or clarifications to the definitions.

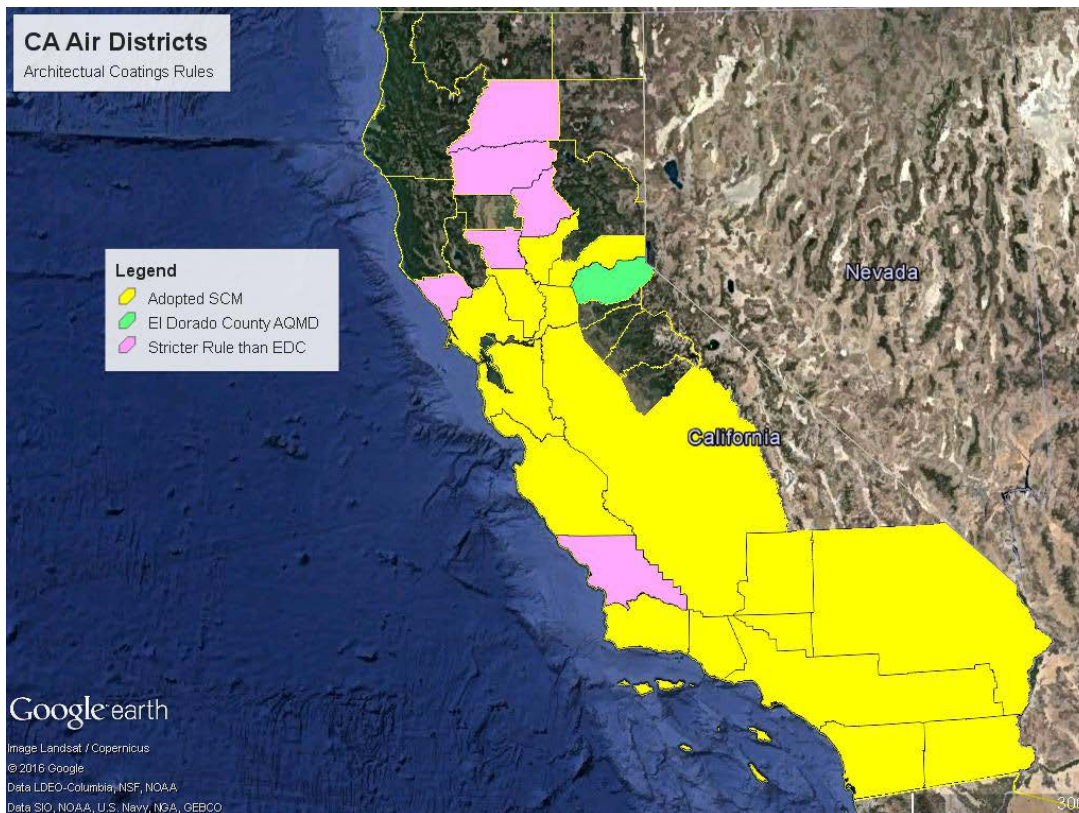
INTRODUCTION

Rule 215 – Architectural Coatings sets VOC limits and usage requirements for all architectural coatings sold, applied, or manufactured for sale in El Dorado County. Rule 215 – Architectural Coatings was last revised on September 27, 1994.

Architectural coatings are paints applied to stationary sources along with their corresponding accessories. VOCs are emitted from these coatings in addition to the solvents used to thin them and for clean-up. AQMD is responsible for controlling these emissions and is basing these rule amendments on the 2007 Suggested Control Measure (SCM) proposed by the Air Resources Board (ARB). VOC emissions are regulated because they are precursors in the formation of ozone, which results in negative impacts on public health. The SCM was modeled after a previous version of South Coast Air Quality Management District's (SCAQMD's) Rule 1113, which applies to architectural coatings.

Of the 35 air districts in California, 13 have no Architectural Coatings rule, 6 have a rule based on the 2000 SCM, and 15 have a rule based on the 2007 SCM. El Dorado AQMD is the only "non-attainment" air district to not have adopted at least the 2000 SCM. The following graphic depicts those districts with a rule consistent with the 2007 SCM (yellow), those which have an architectural rule consistent with the 2000 SCM, which is still more

stringent than current Rule 215 (pink), and those districts without any architectural coatings rule (no shading).



AQMD staff conducted surveys of retail facilities in El Dorado County which sell architectural coatings and found that the majority of product already on the shelves would comply with the proposed rule. This is because most manufacturers provide a line of California compliant products and retailers simply carry coatings that comply with the most stringent rule in California rather than carrying and managing inventory for multiple lines of coatings.

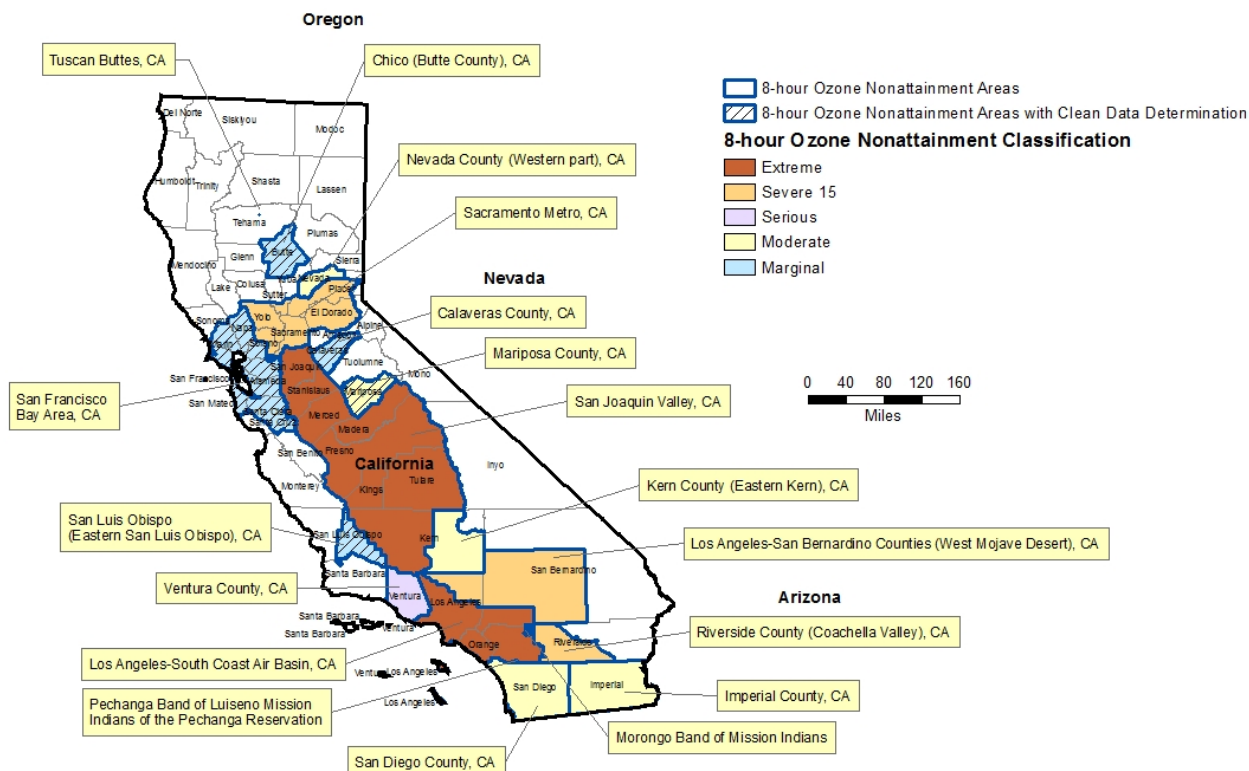
BACKGROUND

LEGAL MANDATES

Federal Mandates: The AQMD has been designated as a non-attainment area for the federal 8-hour ozone standard by the U.S. Environmental Protection Agency. The AQMD is required to implement and enforce regulations that will make progress towards attaining the federal ozone standard. The following graphic shows the 2008 8-hr ozone National Ambient Air Quality Standard (NAAQS) attainment status of all the air districts in California. It indicates El Dorado, along with the other air districts in the Sacramento region, is designated as “severe” nonattainment for the NAAQS.

California 8-hour Ozone Nonattainment Areas (2008 Standard)

02/13/2017



AQMD, along with other air districts in the Sacramento Federal Nonattainment Area (SFNA) approved the *Sacramento Regional 8-hour Ozone Attainment and Reasonable Further Progress Plan* (“Plan”) in 2009 (revised in 2011 and 2013). This Plan demonstrates how existing and new control strategies will provide for the necessary future emission reductions to meet the federal Clean Air Act requirements toward attainment of the 1997 8-hour ozone National Ambient Air Quality Standard (NAAQS) by 2019. To achieve the additional emission reductions needed for attaining the ozone standard, the Plan included new control measures to be included in the State Implementation Plan (SIP). The SFNA air districts, along with AQMD, committed to adopting various control strategies and rule updates in the Plan, collectively known as “SIP commitments.” AQMD’s SIP commitment includes an update to Rule 215 - Architectural Coatings, which was last amended in 1994.

State Mandates: The AQMD is designated non-attainment for the state 1-hour and 8-hour ozone standard by the California Air Resources Board. The AQMD is required to implement and enforce all feasible measures towards attainment of the state standards.

DISCUSSION OF PROPOSED RULE AMENDMENTS

The proposed Rule 215 amendments include changes to the various coatings categories, the addition of definitions, and lowering of VOC content limits across most coatings categories. However, there are several categories in which the VOC limit would not change

from the current limit in Rule 215. Once amended, the coatings categories, definitions, and VOC content limits will be virtually identical to the 2007 SCM.

The proposed revisions to Rule 101 include additions to the VOC Exempt compound list consistent with compounds found on the EPA's list and other air district's lists, and minor edits to and clarifications of definitions as indicated in the strike-through underline version included in Attachment B.

IMPACTS OF THE AMENDED RULE

Emissions Impacts

ARB's 2012 statewide emissions inventory estimates the total daily emissions of VOC (also represented as Reactive Organic Gases or ROG) from coatings is 58.5 tons. This has been steadily decreasing over the past decade due to the implementation of stricter district rules and introduction of lower VOC content coatings. Based on the ARB survey data, excluding the SCAQMD, reductions will reach 15.2 tons per day (tpd) of VOC emissions for the rest of the state of California. The Plan (revised 2013) estimated a 0.1 ton per day (tpd) VOC emission reduction in El Dorado County by 2018 with adoption and implementation of an amended Rule 215 in 2015.¹

Socioeconomic Impacts

California Health and Safety Code (CH&SC) Section 40728.5(a) requires, in part, that:

“Whenever a district intends to propose the adoption, amendment or repeal of a rule or regulation that will significantly affect air quality or emissions limitations, that agency shall, to the extent that data are available, perform an assessment of the socioeconomic impacts of the adoption, amendment, or repeal of the rule or regulation.”

However, under Section 40278.5(d), districts with a population of less than 500,000 persons are exempt from the provisions of Section 40728.5 (a). The AQMD's population is estimated to be approximately 180,000, well below the 500,000 person threshold. Therefore, a socioeconomic analysis for this rulemaking is not required.

Cost Impacts

Cost Effectiveness

CH&SC Section 40703 requires the District, in the process of the adoption of any regulation, to consider and make public its findings related to the cost effectiveness of a control measure. Cost effectiveness for rulemaking purposes is calculated by dividing the cost of air pollution controls required by the rule by the amount of air pollution reduced. The ARB calculated the cost-effectiveness of each individual limit proposed for the separate coating categories. They concluded that the cumulative cost-effectiveness per pound of VOC reduced is \$1.12. Consumers could experience an average cost increase of up to \$1.21 per

¹ Sacramento Regional 8-Hour Ozone Attainment and Reasonable Further Progress Plan. Note that while the District, as a small portion of the California market, is already the beneficiary of the emission reductions from the SCM, this rule amendment will allow the District to take credit for these emission reductions for planning purposes.

gallon of coating purchased. However, as mentioned, most coatings for sale in El Dorado County already meet the standards in the Rule. Therefore, AQMD does not anticipate any price increases due to adoption and implementation of the amended Rule.

Incremental Cost Effectiveness

CH&SC Section 40920.6 requires an assessment of the incremental cost-effectiveness for proposed regulations relative to ozone, Carbon Monoxide (CO), Sulfur Oxides (SOx), Nitrogen Oxides (NOx), and their precursors. Incremental cost-effectiveness is defined as the difference in control costs divided by the difference in emission reductions between two potential control options that can achieve the same emission reduction goal of a regulation. To support statewide consistency, the District is only considering one control option (the limits in the SCM); therefore an incremental cost effectiveness analysis cannot be performed.

Cost to EDCAQMD

Staff does not anticipate an additional need for staff resources. The District does not require permits for the use of architectural coatings and does not track the sale of architectural coatings as a normal matter. The District intends to enforce this rule at the point of sale of the coatings. The District will continue to do spot checking at retail facilities, which requires some staff resources intermittently throughout the year.

ENVIRONMENTAL IMPACTS OF METHODS OF COMPLIANCE

California Public Resource Code Section 21159 requires the District (at the time of adopting a rule requiring the installation of pollution control equipment or a performance standard) to perform an environmental analysis of the reasonably foreseeable methods of compliance.

The analysis must include the following information for the proposed amendments to Rule 215:

- An analysis of the reasonably foreseeable environmental impacts of the methods of compliance.
- An analysis of the reasonably foreseeable mitigation measures.
- An analysis of the reasonably foreseeable alternative means of compliance with the rule or regulation.

AQMD does not anticipate any foreseeable environmental impacts from the methods of compliance, namely, offering only compliant coatings for sale/use. Therefore, there are no foreseeable mitigation measures. Finally, there is no reasonably foreseeable alternative means of complying with the proposed Rule.

The amendment of Rule 215 – Architectural Coatings will result in a reduction of VOC emission throughout El Dorado County, which would constitute a beneficial impact on the environment by reducing the development of ground-level ozone. The rule is an action taken to protect the public health and the environment. Therefore the revision is categorically exempt. Staff has prepared a Notice of Exemption to meet the CEQA Guidelines (Attachment C).

REGULATORY FINDINGS

CH&SC Section 40727(a) requires that prior to adopting or amending a rule or regulation, an air district's board must make findings of necessity, authority, clarity, consistency, nonduplication, and reference. The findings must be based on the following:

1. Information presented in the AQMD's written analysis, prepared pursuant to CH&SC Section 40727.2;
2. Information contained in the rulemaking records pursuant to CH&SC Section 40728; and
3. Relevant information presented at the Board's hearing for the rule.

The table below describes the finding and the basis for making the finding.

FINDING	FINDING DETERMINATION
<p>Necessity: The AQMD must find that a need exists for the rule or for its amendment or repeal, as demonstrated by the record of the rulemaking authority. (CH&SC Section 40727(b)(1))</p>	<p>It is necessary for the AQMD to adopt the proposed rule amendments to fulfill AQMD's SIP commitment and to continue further progress toward attaining the federal 8-hour ozone NAAQS. CH&SC Section 40920 requires air districts in California to develop rules to implement their plans for attaining state ambient air quality standards.</p>
<p>Authority: The AQMD must find that a provision of law or of a state or federal regulation permits or requires the AQMD to adopt, amend, or repeal the rule. (CH&SC Section 40727(b)(2))</p>	<p>The AQMD is authorized to adopt rules and regulations by CH&SC Sections 40001, 40702, 40716, 40919, 41010, 41013 and 42300.</p>
<p>Clarity: The AQMD must find that the rule is written or displayed so that its meaning can be easily understood by the persons directly affected by it. (CH&SC Section 40727(b)(3))</p>	<p>The AQMD has reviewed the proposed amendments and determined that they can be easily understood by the affected industry. ARB has informally reviewed the amendments and offered edits and revisions for further clarity. In addition, the record contains no evidence that the persons directly affected by the rule cannot understand the rule.</p>
<p>Consistency: The rule is in harmony with, and not in conflict with or contradictory to, existing statutes, court decisions, or state or federal regulations. (CH&SC Section 40727(b)(4))</p>	<p>The proposed amendments do not conflict with and are not contradictory to existing statutes, court decisions, or state or federal regulations.</p>

FINDING	FINDING DETERMINATION
<p>Non-Duplication: The AQMD must find that either: 1) The rule does not impose the same requirements as an existing state or federal regulation; or 2) that the duplicative requirements are necessary or proper to execute the powers and duties granted to, and imposed upon, the AQMD. (CH&SC Section 40727(b)(5)).</p>	<p>The proposed amendments are not duplicative of any state or federal law.</p>
<p>Reference: The AQMD must refer to any statute, court decision or other provision of law that the AQMD implements, interprets, or makes specific by adopting, amending, or repealing the rule. (CH&SC Section 40727(b)(6))</p>	<p>The proposed rule implements the ARB's 2007 SCM.</p>

COMPARISON WITH OTHER APPLICABLE REGULATIONS AND REQUIREMENTS

CH&SC Section 40727.2 requires districts to perform a comparative alternative analysis of any new control standard. Specifically, the District is required to prepare a written analysis that identifies all existing federal air pollution control requirements, including, but not limited to emission control standards constituting best available control technology (BACT) that applies to the same equipment or source type as the rule or regulation proposed for adoption or modification by the District. In addition, the analysis shall identify any other District rule or regulation that applies to the same equipment or source type.

The District proposes to amend the rule to incorporate revisions made to the SCM in 2007, including updated VOC content limits, additions and deletions to the VOC content limits, and removal of the statewide averaging provisions. The revised rule will not differ from the 2007 SCM in any material provision. None of the proposed requirements of Rule 215 would conflict with any other District rules or federal rules, regulations, or policies.

Air districts adjacent to El Dorado County in the Sacramento Federal Nonattainment Area, which includes Placer APCD, Sacramento AQMD, Feather River AQMD, and Yolo-Solano AQMD, have all updated their respective Architectural Coatings rules to be consistent with the 2007 SCM.

PUBLIC NOTICE, COMMENTS, AND STAFF RESPONSES

ARB commenced the public review process for the 2007 SCM with the formation of an industry working group in October 2006. ARB staff held three public workshops and meetings on December 12, 2006; March 13, 2007; and June 6, 2007. The first workshop focused on general discussions regarding the SCM update, the project timeline, and the technical approach. At the second workshop, ARB staff presented draft VOC limits and

revised definitions for several major coating categories. At the third workshop, ARB staff presented draft regulatory language for the entire SCM.²

Draft Rule 215 was emailed to Nancy Adams, Air Pollution Specialist at ARB on January 19, 2017 for review and comment prior to release and review by the public. Ms. Adams provided track-changes edits to proposed Rule 215 on January 30, 2017 via email. The various minor edits and additions were made to proposed Rule 215.

Draft Rule 215 was also emailed to David Darling, Vice President of Health, Safety, and Environmental Affairs at the American Coating Association on January 19, 2017 for review and comment prior to release and review by the public. Mr. Darling provided the following emailed comments on the draft Rule 215 on January 30, 2017:

David Darling, emailed comments on draft Rule 215, January 30, 2017

1. Sell Through Language (both in sections 215.1 B and 215.4 C)

ACA suggests that El Dorado utilize the San Joaquin sell through language since it makes it clear that coatings via the sell through provision can be applied as long as they meet the standards when they were manufactured. Here is the suggested language:

“A coating manufactured prior to the effective date specified for that coating in the Table of Standards, and that complied with the standards in effect at the time the coating was manufactured, may be sold, supplied, or offered for sale for up to three years after the specified effective date. In addition, a coating manufactured before the effective date specified for that coating in the Table of Standards 1 may be applied at any time, both before and after the specified effective date, so long as the coating complied with the standards in effect at the time the coating was manufactured. This Section does not apply to any coating that does not display the date or date-code required by Section 215.5.”

Also, for Section 215.4 C, please change 1/1/2015 to 1/1/2018.

AQMD Response: The suggested changes have been incorporated into Section 215.1.B of proposed Rule 215.

2. New Categories Provision

ACA respectfully requests that El Dorado include a “New Categories Provision” to Section 215.4, consistent with other CA Air District Rules, including San Joaquin. This provision allows coatings in new categories with new higher limits (including Tub and Tile; Stone Consolidants) to be sold, as opposed to selling coatings in small containers. Here is the suggested language:

“Prior to January 1, 2018, any coating that meets a definition in Section 215.9 for a coating category listed in the Table of Standards and complies with the applicable

² California Air Resources Board “Staff Report for Proposed Amendments to the Suggested Control Measure for Architectural Coatings,” September 2007.

VOC limit in the Table of Standards and with Sections 215.4 B and 215.5 shall be considered in compliance with this rule. “

AQMD Response: The suggested changes have been incorporated into Section 215.4.G of proposed Rule 215.

3. Table of Standards

There seems to be multiple entries for several categories, including two Fire Resistive; two Stains; two Swimming pools; and three Wood Preservative categories listed. There should only be one of each listed.

AQMD Response: The suggested changes have been incorporated into the Table of Standards of proposed Rule 215.

4. Categories that are changing with an effective date of 1/1/2015

Instead of a 1/1/2015 effective date, ACA suggests including a date of 1/1/2018 for the following categories: Below Ground Preservative; Clear Wood Finish; Fire Retardant; High Temperature Industrial Maintenance; Traffic Coating; Swimming Pool Coatings; Lacquer; Opaque; Opaque Wood Preservatives; Sanding Sealers; Semitransparent Stains; Water Proofing Sealers.

AQMD Response: The suggested changes to the effective date have been made throughout proposed Rule 215.

5. Industrial Maintenance and Zinc Rich Primers

ACA suggests including four label statements:

“For industrial use only”; “For professional use only”; “Not for residential use”; or “Not intended for residential use”

AQMD Response: The suggested changes have been incorporated into Section 215.5.E of proposed Rule 215.

On February 21, 2017, a voicemail was received Clark at New Look International, a manufacturer of coatings and building material solutions concerning the inclusion of Dimethyl Carbonate (DMC) on the VOC Exempt list. This is the same comment AQMD received in April 2013 from Mark Smith at Kowa American Corp. AQMD sent Clark an email on February 22, 2017 indicating it is AQMD's intent to include DMC in the VOC Exempt list of Rule 101.

Draft Rules 215 and 101 were emailed to Arnold Lazarus, US Environmental Protection Agency Region IX for review and comment on March 20, 2017. Mr. Lazarus provided track-changes edits to both rules on March 23, 2017 via email. The edits included correcting some cross reference issues and chemical compound spellings. The various minor edits and additions were made to the proposed rules.

AQMD sent an email on March 16, 2017 to Kevin Williams at Sacramento Metropolitan AQMD, Yushuo Chang at Placer County APCD, Matt Jones at Yolo-Solano AQMD, Sondra

Spaethe at Feather River AQMD, Nancy Adams at ARB and Andrew Steckel at EPA notifying them of the availability of proposed Rules 215 and 101 and the public workshop on April 25, 2017. Kevin Williams responded by email stating proposed Rule 101 language concerning TBAC being exempt for purposes of emissions limitations or VOC content requirements but not for recordkeeping came from the Code of Federal Regulations when TBAC was initially exempted. He stated EPA has since removed that requirement and recommended leaving it out. AQMD has removed this requirement from the proposed Rule 101.

Public Draft Release

In accordance with CH&SC Section 42311, draft document availability and a public workshop were noticed on March 20, 2017 in the *Mountain Democrat* and on March 22, 2017 in the *Tahoe Tribune* newspapers. The public workshop was held April 25, 2017 at the El Dorado County Public Library in Placerville.

The public notice for the proposed Rule 215 and Rule 101 amendments were:

1. mailed to all applicable permitted sources and retail establishments selling architectural coatings (paints) in El Dorado County (See Appendix E),
2. posted on AQMD's website, [http://www.edcgov.us/Government/AirQualityManagement/Rule_215 -
_Architectural_Coatings_update_to_SCM.aspx](http://www.edcgov.us/Government/AirQualityManagement/Rule_215_-_Architectural_Coatings_update_to_SCM.aspx)
3. AQMD's Facebook Page: <https://www.facebook.com/EDCAQMD>, and
4. AQMD's Twitter Page: <https://twitter.com/EDCAQMD>

Comments received during the public comment period are:

David Darling, American Coatings Association, letter dated April 4, 2017, requesting the following:

Small Container Exemption "Anti-bundling Language"

ACA is concerned that as written, Section 215.3(A)(2), will ban the sale of "kits" in the Districts. Kits are a group of small containers of coatings from different coating categories that are packaged together for the convenience of the consumer. These could include for example "kitchen cabinet refinish kits" that include a deglosser, primer, topcoat and clear finish. Consumers could buy each of these products anyway - so it would not be a circumvention of the rule. Please note that SCAQMD and Yolo Solano recently adopted language that allows for the sale of kits.

ACA suggests the following minor edits to the proposed rule language:

"2. Architectural coatings supplied in containers having capacities of one liter (1.057 quart) or less provided the following requirements are met:

- a. The container is not bundled together with other containers of the same specific coating category (listed in the Table of Standards) to be sold as a unit that exceeds one liter (1.057 quarts), excluding containers packed together for shipping to a retail outlet.

b. The label or any other product literature does not suggest combining multiple containers of the same specific category (listed in the Table of Standards) so that the combination exceeds one liter (1.057 quarts)."

AQMD Response: The suggested changes have been incorporated into Section 215.3.A.2 of proposed Rule 215.

Industrial Maintenance and Zinc Rich Primer labeling - ACA suggests adding one additional statement "Not intended for residential use" to be consistent with other CA Air District AIM VOC rules.

AQMD Response: The suggested changes have been incorporated into Section 215.5.E and 215.5.K of proposed Rule 215.

Sales Data - Section 215.6 (A) - ACA suggests the following edits - "The responsible official shall within 180 days written notice provide information...."

AQMD Response: The suggested changes have been incorporated into Section 215.6.A of proposed Rule 215.

Additionally, Mr. Darling sent an email May 15, 2017 requesting 2-amino-2-methyl-1-propanol (AMP) be included on the VOC Exempt list in Rule 101. AMP is the most recently exempted VOC by the EPA; it was exempted on June 25, 2014. AMP has been a neutralizer used in coatings for more than 20 years. AQMD has included AMP on the VOC Exempt list in Rule 101.

Glenn Webb, Owner, The Paint Spot, phone conversation discussing the proposed limits on Lacquer (275 g/L) and Industrial Maintenance Coatings (250 g/L). Conference call discussion with APCO and Air Quality Specialist resulted in a site visit to his store to view the products in question. Several emails were sent back and forth discussing research findings concerning other air district adoption of SCM limits and possible solutions such as labelling and replacement coatings. A meeting with Mr. Webb occurred at the AQMD on April 7, 2017 to discuss Rule 215 and Rule 237 Wood Products Coatings. Result of the meeting was clarification of how both rules are applied, of how most of his customers typically use lacquer, and that he does carry compliant industrial maintenance coatings. The lacquers he carries with VOC contents of 550 g/L and 680 g/L are compliant with wood products refinishing limits in Rule 237. Therefore, application of labels to the containers stating "Not for Architectural Use" would be an acceptable method to comply with proposed Rule 215. Mr. Webb was also the only attendee of the April 25, 2017 public workshop but did not present any additional comments.

Mike Churchill of Churchill's Hardware in Cameron Park, emailed dated April 18, 2017 as follows:

This email is in regards to Rule 215 and the upcoming meeting on April 25. I will not be able to attend but I wanted to submit my comments.

I am a retailer of architectural coatings. Many products I buy and sell meet the AQMD requirements. There are a few that do not. While we are limited, I feel that we can serve the needs of the community with the current regulations. Manufacturers are improving their

products to perform better while meeting control measures. I believe that manufacturers will continue to improve their products on their own without additional mandates and regulations.

SCAQMD regulations, I believe, are more strict. The products available to me for resale labeled as meeting the SCAQMD requirements are significantly fewer than what is permitted generally throughout the state of California.

Most of the products I sell are consumer based products such as latex house paint, enamels, wood stains, deck stains, varnish, and polyacrylics. Some of the name brands include Sherwin-Williams, Kilz, Valspar, Minwax, and Rustoleum. I do not want to see any regulation that would further limit the products I can buy from these vendors.

On a final note, I am somewhat disappointed that some products are not available for sale in small quantities. Some products have no substitute for quality and performance regardless of their VOC content. Some of these products do not have to be used in large quantities. I would like to see regulatory exceptions for products made in small volumes. As an example, the base chemical xylene is not available. I would like to see a discussion on the use of similar products in very small portions, like half-pints.

I am available for further communication if desired.

AQMD Response: Staff emailed Mr. Churchill thanking him for his feedback and indicating that our retail inventory survey revealed very few non-compliant coatings and according to the survey, his store did not have non-compliant coatings. We recommended an Air Specialist survey his current inventory to identify potential compliance conflicts. We also informed him of the exemption of coatings sold in containers of one liter or less in the proposed new rule. AQMD also called on April 26, 2017 to offer an inspection of Mr. Churchill's inventory. An Air Quality Specialist met with Mr. Churchill on May 5, 2017 to survey his inventory and answer any questions. After the survey, AQMD staff determined Churchill's Hardware does not carry any coatings that would not be in compliance with the proposed rule.

ATTACHMENT A

**PROPOSED AMENDMENTS TO
RULE 215 – ARCHITECTURAL COATINGS;
STRIKE-OUT UNDERLINE VERSION and
CLEAN VERSION**

ATTACHMENT B

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**MAILED NOTICING LIST and
PROOF OF NEWSPAPER NOTICING**