

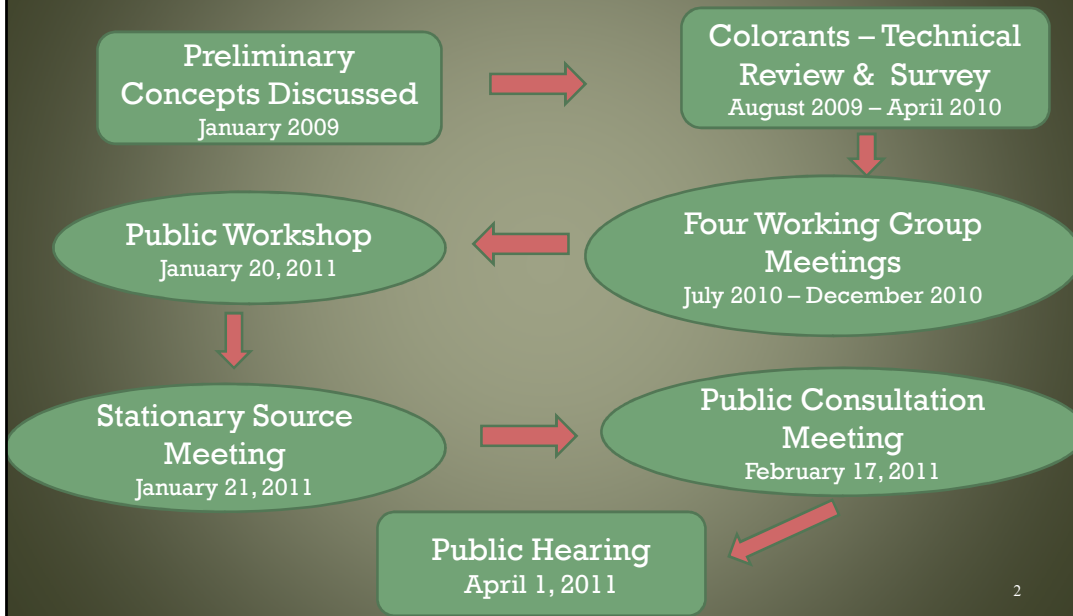
Proposed Amended Rule 1113 – Architectural Coatings



Public Consultation
Meeting
February 17, 2011

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Rule Development Schedule



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Proposed Changes to Draft Rule since Public Workshop

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Applicability



Defining the term 'market', which is included in the applicability section

MARKET means to facilitate sales through third party vendors that bring together buyers and sellers. For the purposes of this rule, market does not mean to generally promote or advertise coatings.

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Definitions



Clarify definition:

METALLIC PIGMENTED COATINGS are decorative coatings, excluding industrial maintenance and roof coatings, containing at least 0.4 pounds per gallon (48 grams/liter) of coating, as applied, of elemental metallic pigment (excluding zinc).



Previous rule clarification on this issue (email dated August 17, 2006)

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Definitions



Amend Faux Clear Topcoat to include following labeling requirement:

Effective January 1, 2012, the labels of all Clear Topcoats for Faux Finishing coatings shall prominently display the statement “This product can only be sold as a part of a Faux Finishing coating system”.

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Definitions



Volatile Organic Compound

Staff received clarification from the EPA and since there are no specific reporting requirements for VOCs under Rules 1113 and 314, there will be no additional reporting requirements for t-Butyl Acetate. The change to the exemption will only affect any required state or federal reporting requirements.

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Requirements







Paragraphs (c)(1) and (c)(2) were modified for further clarification



Requirements on IM Coatings have been moved to (c)(7) as a stand alone provision

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VOC Limits / Table of Standards 1

-  Moved Non-Sacrificial Anti-Graffiti Coatings under IM Coatings
-  Moved effective date for Trowel Applied Faux Coatings to 1/1/14
-  Increased proposed VOC limit for Clear Topcoats to 100g/L
-  Removed proposed VOC limit for PSUs and Specialty Primers

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Table of Standards 2

-  Clarified that the architectural coatings category excludes IM coatings

COLORANT	Limit (g/L)
Architectural Coatings, Excluding IM	50
Solvent Based IM	600
Waterborne IM	50

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Sell Through Provision

-  Added sell through language for changes that affect product labels

Any coating that is manufactured prior to a change in the applicable labeling requirements may be sold, supplied, or offered for sale with the old label for up to three years after the effective date of the change so long as the coating is compliant with the current applicable VOC limit.

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Test Methods

-  Considering the addition of methods to characterize gonioapparent coatings
 -  ASTM E1767 - 04 Standard Practice for Specifying the Geometries of Observation and Measurement to Characterize the Appearance of Materials
 -  ASTM E2194 - 09 Standard Practice for Multiangle Color Measurement of Metal Flake Pigmented Materials

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Exemptions



Amended bundling language:

- B. The coating containers are not bundled together to be sold as a unit that exceeds one liter (1.057 quarts), excluding containers packed together for shipping to a retail outlet; and
- C. The label or any other product literature does not suggest combining multiple containers so that the combination exceeds one liter (1.057 quarts).

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Exemptions



Amended the following exemption:

Architectural coatings supplied, sold, offered for sale, marketed, manufactured, blended, repackaged or stored in this District for shipment outside of this District or for shipment to other manufacturers for repackaging.

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Additional Items Under Review



Niche Categories - Awaiting additional information

- Stone Consolidants
- Penetrating Reactive Sealers

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Recent Colorant Dispenser Trends



Nozzle closing devices



Humidifying



Improved canister seals



Agitation and recirculation



Tinted sample sizes

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Assumptions for Colorant Analysis



Small Retailers can use same dispensers with added maintenance



Medium Retailers (≈ 221) may purchase new dispensers



Big Box Retailers (≈ 188) plan to have dispensers capable of delivering low VOC colorants

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Assumptions for Colorant Analysis



Increased Maintenance for Colorants

- All retailers ($\approx 3,436$) will increase maintenance 10 minutes/day to clear nozzles
- Medium Retailers will increase the maintenance/frequency of calibration (\$300/year)

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Assumptions for Colorant Analysis



Incremental Cost for Colorants

- Colorant increase 5%
 - \approx \$1.80/gallon
 - \approx 1,00,320 gallons per year
- No Incremental Cost for Dispensers

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Cost Effective Analysis Colorants

Estimated Emission Reduction (tons/year)	1,018
Annual Incremental Cost for Daily Maintenance	\$6,270,700
Annual Incremental Cost for Dispenser Maintenance	\$66,300
Incremental Cost for Colorant	\$1,800,576
Total Annual Cost	\$8,137,577
Overall Cost Effectiveness	\$7,990

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Cost Effective Analysis Coatings

Category	Incremental Cost	Emission Reductions (tons/year)	Gallons Affected Annually	Cost/ton
Dry Fog	\$0.91	7	79,211	\$11,090
Form Release	-\$2.96	59	133,371	-\$6,650
Fire Proofing	\$2.97	3	2,586	\$2,845
Graphic Arts	\$4.77	1	2,424	\$11,975
Metallic Pigmented	\$13.19	68	66,557	\$12,952
Total Emissions Reductions		137		
			Total Annual Cost	\$574,665
			Overall Cost Effectiveness	\$4,184

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Cost Effective ACO Changes

Category	Incremental Cost	Emission Reductions (tons/year)	Gallons Affected Annually	Cost/ton
Specialty Primer	\$7.99	365	288,982	\$6,320
PSU	\$4.57	7	92,989	\$58,394
WPCMS	\$4.49	1	1,189	\$6,899
Total Emission Reductions		373		
			Total Annual Cost for Limiting Categories	\$2,737,809
			Overall Cost Effectiveness for Limiting Categories	\$7,335
Phase Out	\$4.49	230	1,251,191	\$24,427
			Total Annual Cost for Phase Out	\$5,619,401
			Total Annual Cost for changes to ACO	\$8,357,210
			Overall Cost Effectiveness for change to ACO	\$13,853


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Overall Cost Effectiveness


Category	Total Annual Cost	Emissions Reduction (tpd)	Cost/ton
VOC Limit Reductions	\$574,665	0.4	\$4,184
VOC limit on Colorant	\$8,137,577	2.8	\$7,990
ACO Changes	\$8,357,210	1.7	\$13,853
Total	\$17,069,452	4.8	
Overall Cost Effectiveness			\$9,704

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Next Steps

-  Distribute draft CEQA document

-  Set Hearing: March 4, 2011
 - Release Draft Staff Report
 - Draft PAR 1113

-  Public Hearing: April 1, 2011

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Questions ?



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Contacts



Rule Amendment

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