

**1106 - MARINE COATING
OPERATIONS & 1106.1 -
PLEASURE CRAFT COATING
OPERATIONS
WORKING GROUP MEETING**

January 16, 2019

AGENDA

- Goals**
- Purpose**
- Proposal**
- Other Impacts**
- Tentative Schedule**

PURPOSE

- **Meet RACM/RACT requirements**
 - Align VOC limits in Rules 1106 with U.S. EPA Control Techniques Guidelines
 - Align VOC limits in Rules 1106 & 1106.1 with other CA APCDs/AQMDs

- **Enhance Compliance Reviews**
 - Observed non-compliance with products in use and on retail shelves

- **Meet BARCT requirements**
 - Add spray gun transfer efficiency requirements

- **Clarification & Consistency Updates**

PROPOSED AMENDMENT GOALS

Enhance rule effectiveness

- Last amendment – January 1995
- Update rule with requirements consistent with other Regulation XI rules (e.g. VOC labeling)
- Remove ‘out of date’ rule language

Enhance enforceability

- New prohibition of possession, specification & sales
- Restrict sales of non-compliant coatings from being distributed to commercial and consumer outlets
- Require removal of non-compliant coatings from commercial operations
- New most restrictive VOC limit rule language

Other

- New transfer efficiency requirements

PROPOSAL

- **Subsume Rule 1106.1 into Rule 1106**
 - Format VOC limits into two Table of Standards, one for Marine and one for Pleasure Craft categories {PAR 1106 paragraphs (d)(1) & (d)(2)}
- **Add Purpose subdivision to Proposed Amended Rule 1106** {PAR1106 subdivision (a)}
- **Align VOC limits with U.S. EPA CTG and other CA APCDs / AQMDs** {PAR1106 paragraphs (d)(1) & (d)(2)}
- **Add Prohibition of Possession, Specification and Sales rule language** {PAR1106 subdivision (e)}
- **Add transfer efficiency requirements** {PAR1106 subparagraphs (d)(9)(A) & (d)(9)(B)}
- **Remove obsolete rule language**
 - Out of date rule language not necessary

PROPOSAL (CONT)

Other

- Remove or amend touch-up definition and exemption {PAR1106 paragraph (j)(2)}
- Consider toxicity related to copper and other heavy metals, especially in antifoulant coatings

Make Updates and Editorial Corrections as necessary

- Corrections to spelling errors, etc.

OTHER IMPACTS

- CEQA analysis
- Socioeconomic analysis

TENTATIVE SCHEDULE

- Working Group Meeting January 16, 2019
– Please submit comments by January 30, 2019
- Public Workshop February 12, 2019
- SSC March 15, 2019
- Set Hearing April 5, 2019
- Public Hearing May 3, 2019