



El Dorado County

Air Quality Management District

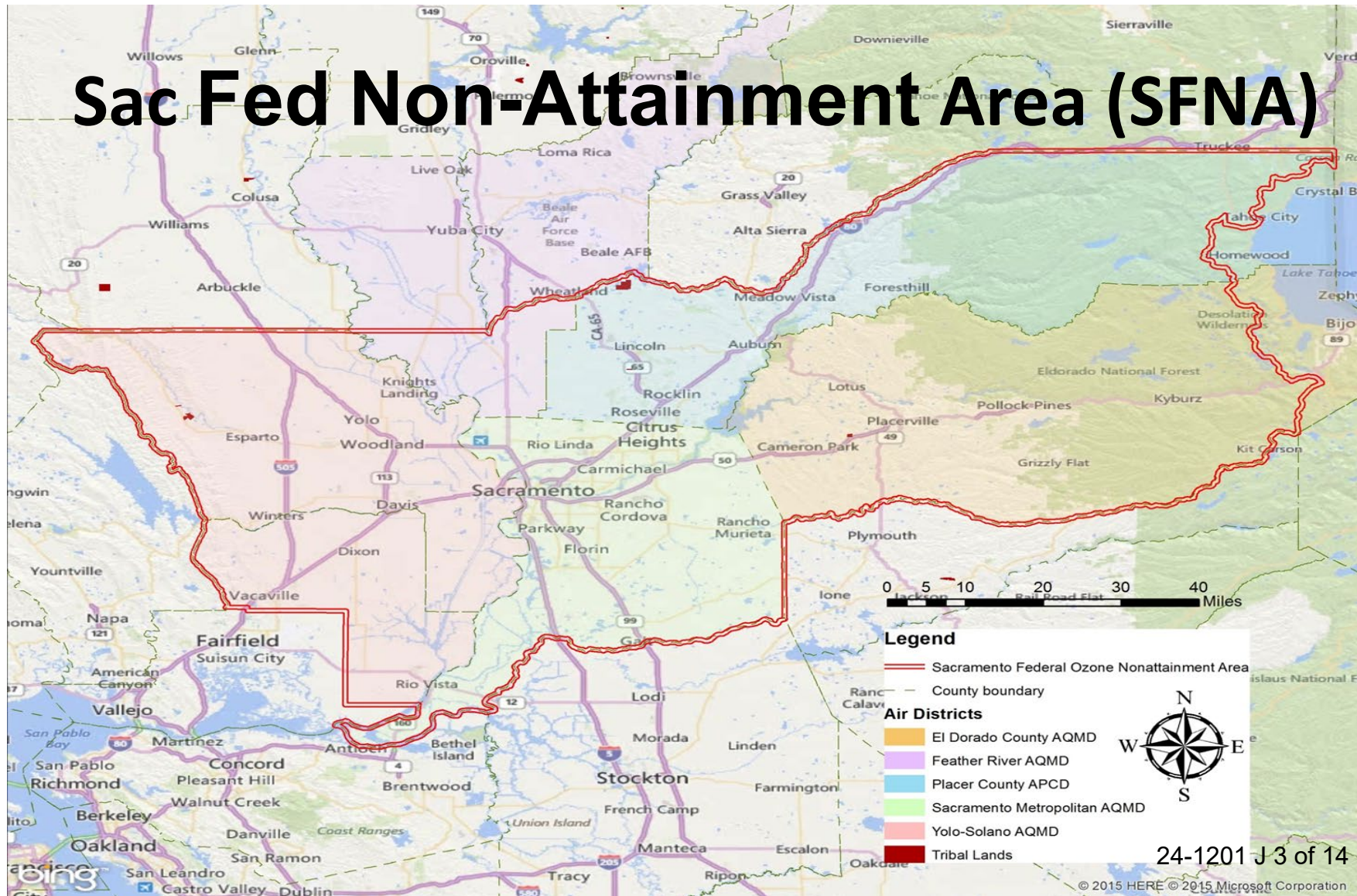
Public Hearing
on
Rule 215 Architectural Coatings
July 16, 2024

Background

- Ozone NAAQS Non-attainment
 - El Dorado & Sac Region do not meet NAAQS Ozone STD
 - VOC + NO_x + sunlight = Ozone
 - US EPA requires plan to reach attainment
 - Districts review CARB emissions inventory & their existing rules to find ways to reduce emissions.

Background

Sac Fed Non-Attainment Area (SFNA)

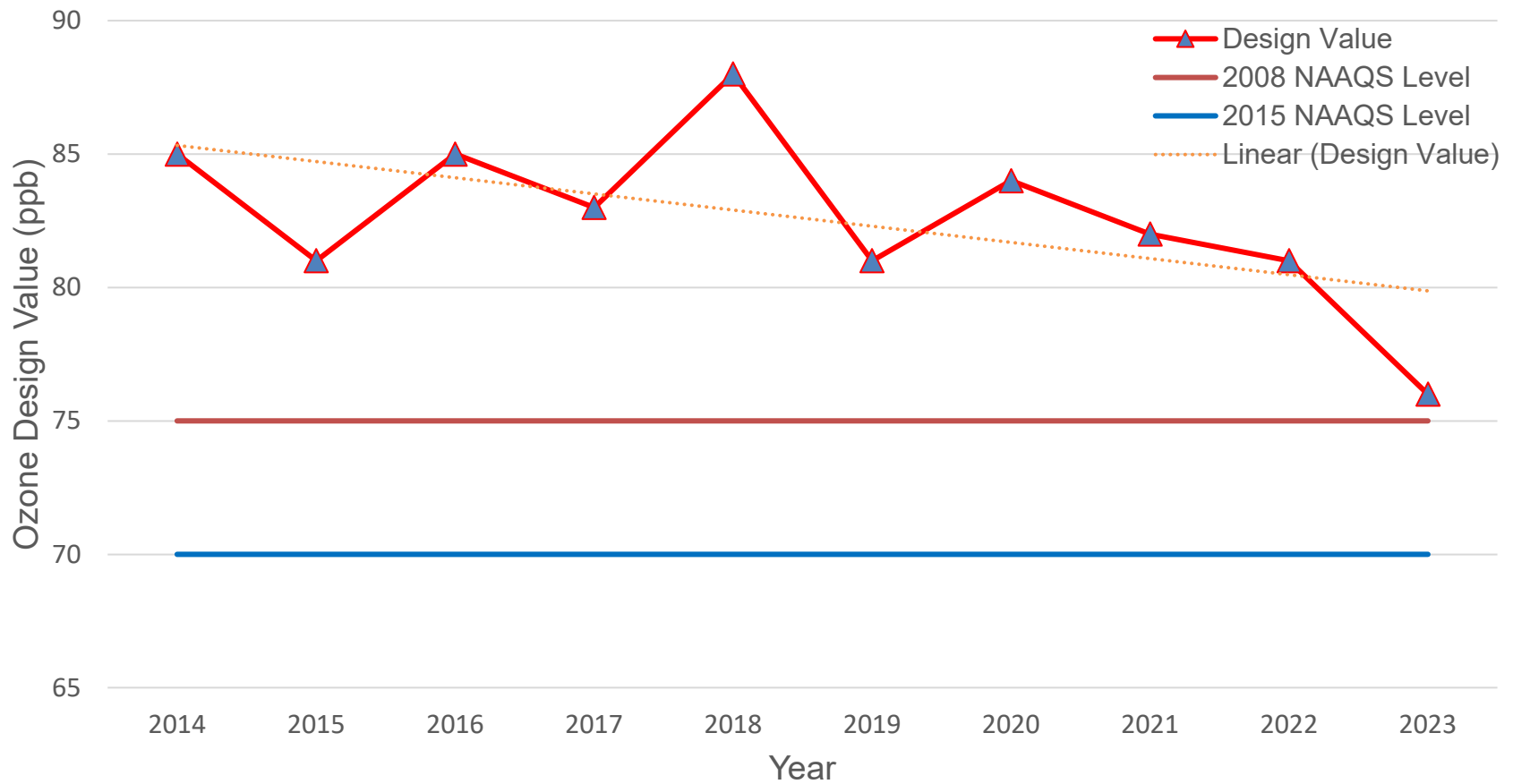


Regional Ozone NAAQS Plans

- 2008 NAAQS 8-hour Ozone Attainment and Reasonable Further Progress Plan (2008 Ozone NAAQS Plan)
- 2015 NAAQS 8-hour Ozone Attainment and Reasonable Further Progress Plan (2015 Ozone NAAQS Plan)

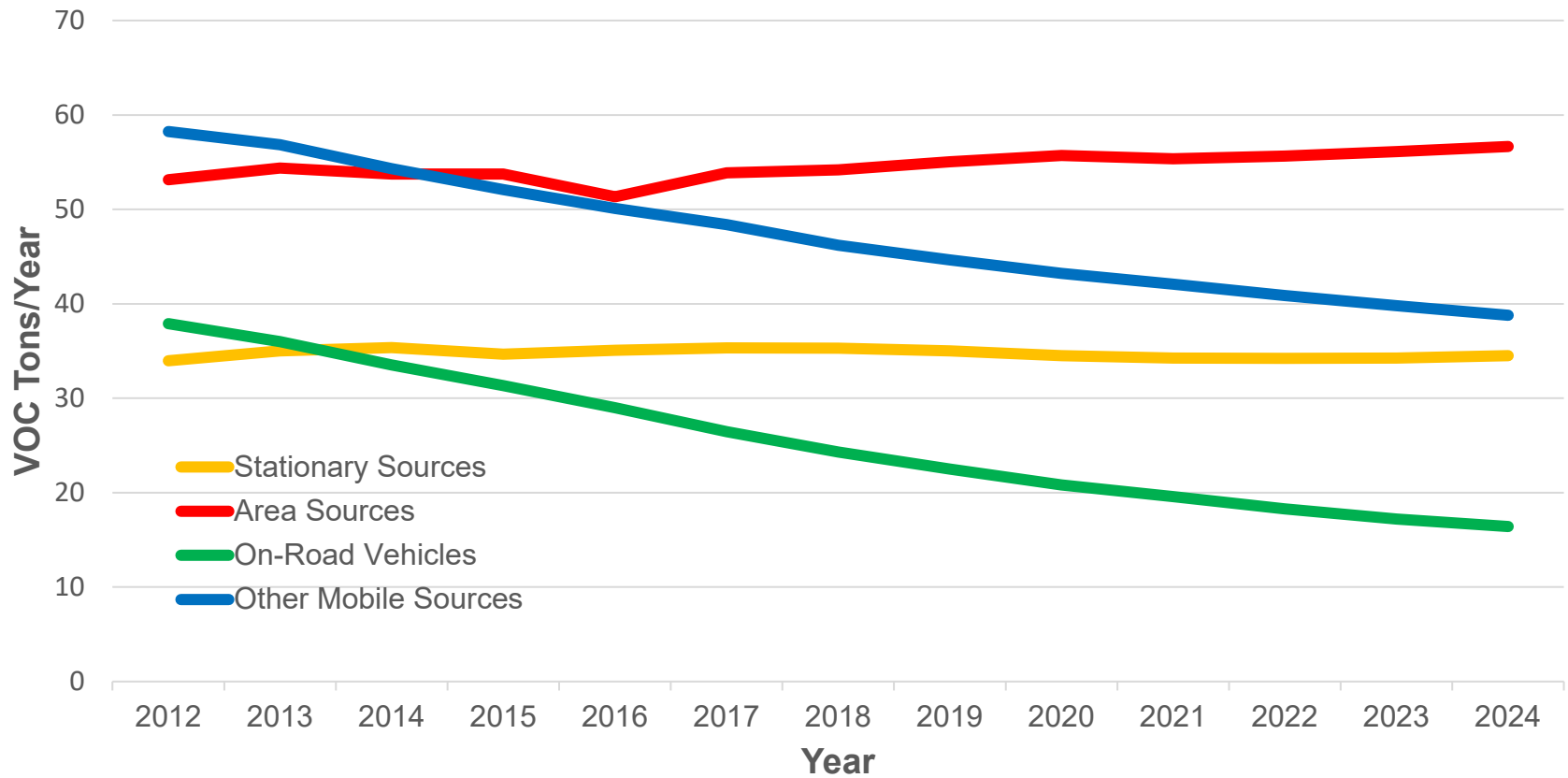
SFNA Ozone Trend

Sacramento Metro Non-attainment Area Peak Ozone Design Values
(Source: EPA)

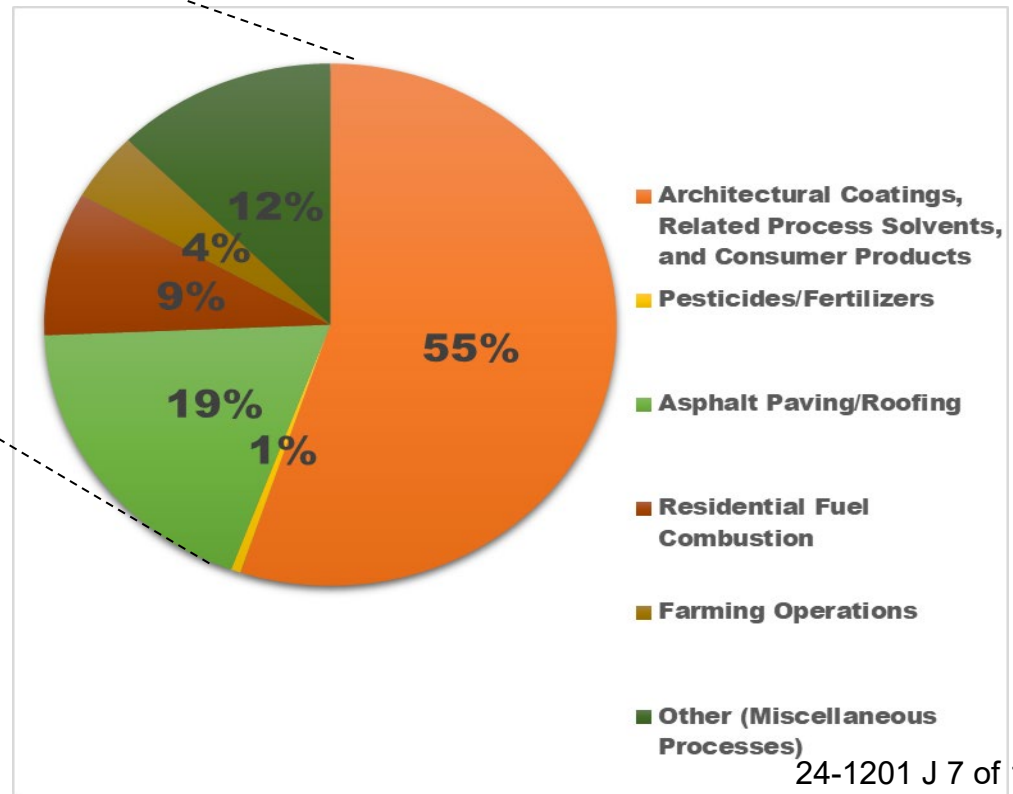
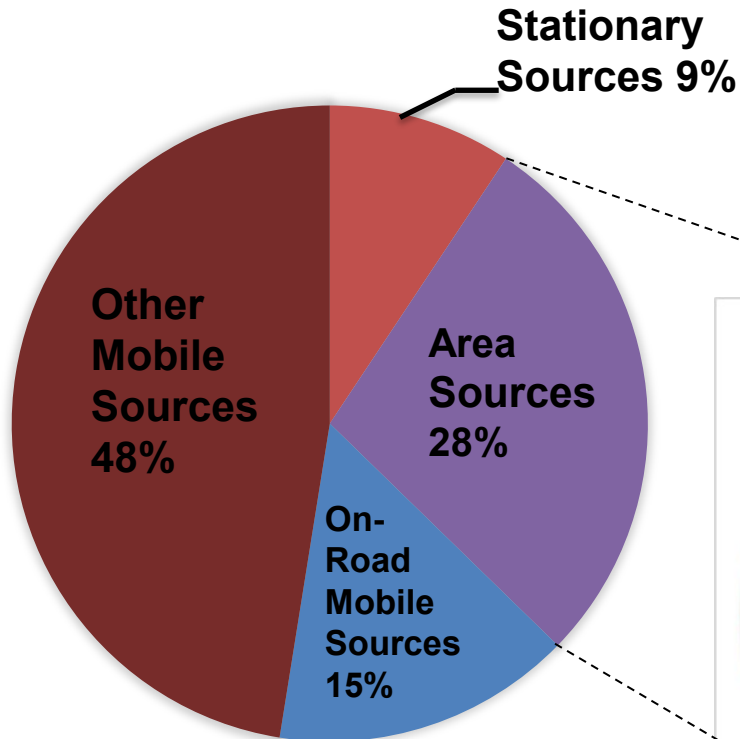


SFNA - VOC Summer Planning Inventory

SFNA VOC Emissions by Source Category



EDC VOC Emissions Inventory



2017 Emissions (12.3 tpd)

Proposed Revisions

- State Implementation Plan (SIP)
 - Req. Ozone Attainment Plan - Air Districts
- 2019 – CARB released Suggested Control Measure (SCM) for Arch Coating
- 2023 – EDCAQMD committed to incorporate SCM levels in Arch Coating Rule by 2024 as contingency measures
- Contingency measure provisions if triggered, would automatically establish more stringent requirements, consistent with the 2019 Architectural Coatings SCM

Proposed Revisions

- Rule 215 – Propose to adopt CA Air Resources Board Suggested Control Measure (SCM) 2019
- Table of Standards shows existing & proposed categories & limits under contingency measure
- Proposed contingency measures rule VOC limits will come into effect on “Contingency Measure Trigger Date” which is the effective date of a final EPA rule finding that the SFNA fails to meet RFP in a milestone year or attain the standard by the attainment year of either the 2008 or 2015 ozone NAAQS
- Sell through period of 1 year

TABLE OF STANDARDS 1
VOC CONTENT LIMITS FOR ARCHITECTURAL COATINGS
(EFFECTIVE IF CONTINGENCY MEASURE IS TRIGGERED)

VOC COATINGS CATEGORY Grams VOC/L less water and exempt organic compounds	Current Limit (g/L)	EFFECTIVE On and after Contingency Measure Trigger Date Limit (g/L)
Flat Coatings	50	
Nonflat Coatings	100	50
Nonflat - High Gloss Coatings	150	50
Specialty Coatings¹		
Aluminum Roof Coatings	400	100
Basement Specialty Coatings	400	
Bituminous Roof Coatings	50	
Bituminous Roof Primers	350	
Bond Breakers	350	
Building Envelope Coatings ²		50
Concrete Curing Compounds	350	
Concrete/Masonry Sealers	100	
Driveway Sealers	50	
Dry Fog Coatings	150	50
Faux Finishing Coatings	350	
Fire Resistive Coatings	350	150
Floor Coatings	100	50
Form Release Compounds	250	100
Graphic Arts Coatings (Sign Paints)	500	
High Temperature Coatings	420	
Industrial Maintenance Coatings	250	
Low-Solids Coatings*	120	
Magnesite Cement Coatings	450	
Mastic Texture Coatings	100	
Metallic Pigmented Coatings	500	
Multi-Color Coatings	250	
Pre-Treatment Wash Primers	420	
Primers, Sealers, and Undercoaters	100	

Reactive Penetrating Sealers	350	
Recycled Coatings	250	
Roof Coatings	50	
Rust Preventative Coatings	250	
Shellacs: Clear	730	
Shellacs: Opaque	550	
Specialty Primers, Sealers, and Undercoaters	100	
Stains (Exterior/Dual)	250	100
Stain (Interior)		250
Stone Consolidants	450	
Swimming Pool Coatings	340	
Tile and Stone Sealers ²		100
Traffic Marking Coatings	100	
Tub and Tile Refinish Coatings	420	
Waterproofing Membranes	250	100
Wood Coatings -	275	
Wood Preservatives	350	
Zinc-Rich Primers	340	

¹For Low-Solids Coatings the limit is expressed as VOC Actual.

² Prior to the Contingency Measure Trigger Date, a specific Building Envelope Coating or Tile and Stone Sealer will be classified based on the current specialty coating definition it meets, or, if it doesn't meet any current specialty coating definition, it will be classified as Flat, Nonflat or Nonflat - High Gloss, based on its gloss level, and the corresponding VOC content limit will apply.

Field Surveys

- AQMD survey of retailers 2023
 - Vast majority of paints already in compliance
 - Many retailers already carrying SCM compliant coatings due to nearby air district SCM adoption

Recommendations

- Board adopt Resolution -----
Revising Rule 215
- Direct staff to submit to CARB
 - CARB will transmit to EPA for inclusion in State Implementation Plan (SIP)

Thank you! Questions?