Questions and Answers

Proposed Amendment to Consumer Products and AIM Coatings Regulations

SIPRAC 09/08/16

1. "Sell thru"/"use thru" provisions in RCSA sections 22a-174-40 and 22a-174-41? Bob Silvestri, PSEG.

Consumer Products

The proposed language allows for a three-year sell through only for multi-purpose solvent aerosols and paint thinner aerosols that contain methylene chloride; perchloroethylene, or trichloroethylene, or greater than 1% aromatic compound content by weight (Draft RCSA section 22a-174-40(d)).

AIM Coatings

The proposed language allows for a three-year sell through for all products. While the Model Rule states that the manufacture of certain coatings will stop on January 1, 2018, sale of the coating may continue for an additional three years after the compliance date (Draft RCSA sections 22a-174-41(b)).

2. Is there a document that cross walks eliminated coating categories to the remaining categories in the AIM proposal? Jack Dunne, Pfizer.

Eliminated AIM coating categories and sub-categories

All coating categories and sub-categories eliminated from the AIM proposal will be absorbed into existing or new categories with the exception of “temperature indicator safety coatings.” Surveys conducted by the California Air Resources Board (CARB) in 2001 and 2005 showed that “temperature indicator safety coatings” were not produced in either year. Furthermore, if a manufacturer decides to begin production of this type of coating in the future, it will fall under the category “industrial maintenance.” The corresponding VOC limits for all the categories to be eliminated will either remain the same or be reduced, ensuring no increased emissions due to this action.

The proposed categories for elimination with the category which it is proposed to be absorbed by are shown in Table 1:

Table 1. AIM categories to be eliminated.

Eliminated Category	**Absorbed By**
Antenna Coatings (530 grams per liter (g/l))	Industrial Maintenance (250 g/l)
Antifouling Coatings (400 g/l)	Industrial Maintenance (250 g/l)
Clear Wood Coatings • Clear Brushing Lacquers (680 g/l) • Lacquers (550 g/l) • Sanding Sealers (350 g/l) • Varnishes (350 g/l)	Wood Coatings (275 g/l)
Fire Retardant Coatings • Clear (650 g/l) • Opaque (350 g/l)	Industrial Maintenance (250 g/l)
Flow Coatings (420 g/l)	Industrial Maintenance (250 g/l)
Quick Dry Enamels (250 g/l)	Flat Coatings (50 g/l) or Nonflat Coatings (100 g/l) or Nonflat High Gloss Coatings (150 g/l)
Quick Dry Primers, Sealers & Undercoaters (200 g/l)	Specialty Primers, Sealers & Undercoaters (100 g/l)
Swimming Pool Repair & Maintenance Coatings (340 g/l)	Swimming Pool Coatings (340 g/l)
Temperature Indicator Coatings (550 g/l)	Industrial Maintenance (250 g/l)
Waterproofing Sealers (250 g/l)	Basement Specialty Coatings (400 g/l) or Concrete/Masonry Sealers (100 g/l) or Waterproofing Membranes (250 g/l)
Waterproofing Concrete/Masonry Sealers (400 g/l)	Basement Specialty Coatings (400 g/l) or Concrete/Masonry Sealers (100 g/l) or Waterproofing Membranes (250 g/l)

3. When did CARB and OTC adopted the last revisions to the consumer products and AIM coatings rules? Jack Dunne, Pfizer.

On June 3, 2010, the OTC adopted a Resolution wherein member states agreed to pursue, as necessary and appropriate, state-specific rulemakings to update state rules in accordance with the 2010 OTC Consumer Products and AIM Model Rules. For additional background information visit the Ozone Transport Commission website at http://www.otcair.org/index.asp.

Consumer Products

The OTC revised the 2010 model rule on May 10, 2012 based on the CARB 2009 Consumer Products Regulatory Amendments. The OTC revised the model rule again on May 21, 2013 with a minor amendment that did not affect emissions calculations.

AIM Coatings

The 2009 OTC Architectural, Industrial and Maintenance Model Rule, is based on the 2007 CARB SCM as well as their survey data. The model rule was updated with minor revisions by the OTC workgroup on October 13, 2014.