

**Air Resources Board  
Stationary Source Division  
Workshop Summary**

Workshop: Architectural Coatings

Date: December 14, 1999

Location: Diamond Bar, California

Purpose: (1) To present an overview of the California Air Pollution Control Officers Association (CAPCOA) position paper on the SCM; (2) to present an overview and receive comments on applying the Alternative Control Plan (ACP) Averaging Provision for consumer products to architectural coatings; and (3) to receive comments on the 12/1/99 proposed changes to the Suggested Control Measure for Architectural Coatings (SCM).

Attendees: The workshop was attended by over 50 people representing paint manufacturers, painting contractors and other users, ingredient and equipment manufacturers, public agencies, consultants, U.S. EPA, districts, and industry associations.

Key Points: CAPCOA supports a statewide averaging provision for the SCM. It also supports the most effective volatile organic compound (VOC) limits that, at a minimum, reflect the most stringent district limits. CAPCOA also encourages the districts to adopt the SCM within 12 to 18 months of ARB approval. In discussion, industry representatives expressed concern about the schedule for the completion of the project, and the need to consider various state climatic factors in the final SCM VOC limits and the timing of feedback about the technical data provided to ARB by the industry.

An overview of the ARB's ACP averaging provision from the consumer products program was presented, as an example methodology for providing flexibility to architectural coating manufacturers in complying with the proposed VOC limits. The minimum requirements of any flexibility program are preservation of emissions reductions and SIP commitments, and enforceability. The ACP includes validation of sales records, a one-year maximum compliance period, shortfall contingency measures, enforceable permit conditions, and a demonstration that emissions will be no greater than under the VOC limits. Discussion centered on: the one year compliance period; the difficulty of validating sales; the method of apportioning sales to individual districts; the identification of the baseline against which emissions from reformulation are measured; and, U.S. EPA approvability.

The remainder of the workshop included a discussion of suggested language changes in the SCM. Major topics included: changes to definitions; reporting requirements; painting practices; the effective date of the VOC limits; the prohibition on thinning; clarifications on the most restrictive VOC limits; and follow-up discussion on some of the VOC limits.