

2014 Architectural Coatings Survey: Frequently Asked Questions (FAQs)

This is a compilation of the most frequently asked questions regarding the 2014 Architectural Coatings Survey (2014 Survey). The questions are based on input/comments from stakeholders and questions from the October 23, 2014 webinar, and comments from the Architectural Coatings Reporting Tool (ACRT) beta test. If you have questions not addressed here, please send an email with your questions to archcoatsurvey@arb.ca.gov

General Questions

QUESTION: My company is a distributor of architectural coatings that are manufactured in the US. We don't repackage. Is my company subject to the Architectural Coatings Rule?

ANSWER: Yes, the company must comply with all architectural coatings rules in effect in the air districts where those products are sold. In addition to complying with architectural coatings rules, your company would be required to complete the 2014 Architectural Coatings Survey (2014 Survey).

The 2014 Survey is primarily intended for paint manufacturers who sell architectural coatings in California. If your company is not a paint manufacturer, but your company name is listed as "manufactured for" or "distributed by" on the product label, you are responsible for completing the requested information in this survey. You are encouraged to coordinate your response with the appropriate manufacturer of your product to avoid double reporting of sales data. Holding companies or subsidiaries may also need to report for this survey.

QUESTION: Does the 2014 Survey target manufacturers, distributors, and end-users as well?

ANSWER: End-users of architectural coatings are not required to complete the 2014 Survey.

QUESTION: What additional product categories are being surveyed beyond architectural coatings and is there a standard definition you have developed for these?

ANSWER: We are surveying only architectural coatings. Some product categories have been added since the 2005 Survey to reflect changes in the types of products currently being sold, and some categories were added because they were regulated in the 2007 Suggested Control Measure (SCM). The categories added include: Aluminum Roof Coatings, Basement Specialty Coatings, Concrete/Masonry Sealers, Reactive Penetrating Sealers, Stone Consolidants, Tub and Tile Refinish Coatings, Waterproofing Membranes, Zinc-Rich Primers, and Air and Water Resistive Barrier Coatings. All of the

definitions for these product categories can be found in the Supplemental Information section of the 2014 Architectural Coatings Survey Instructions.

QUESTION: Why are you asking for product labels? Why can't you ask for labels when you need them rather than requiring them upfront?

ANSWER: The architectural coating labels are used to assist us in our evaluation of the survey data. Because coatings are regulated based on product category, it is important to properly categorize the products. In order to confirm that the products have been properly categorized in the survey data, we review the label and look for the claims made by the manufacturers. Based on label claims, and regulatory definitions, we are able to properly categorize the product. This ensures a higher quality data set which then enables us to make better decisions regarding potential emission control strategies.

It would be very time consuming to contact each manufacturer when a label is needed for clarification of a product categorization. Please note that for those products in the Flat Coating category, product labels are not required.

QUESTION: What criteria must be met in order to group products? Do you need ingredient information for each individual product being grouped?

ANSWER: You may group products only if all of the following conditions are met:

- (1) The products belong to the same category (e.g., flats); and
- (2) The products have the same vehicle technology (i.e., solvent-borne or water-borne), resin type, substrate, interior or exterior use recommendation, and single – or multi-component form; and
- (3) VOC Regulatory range cannot exceed 25 grams/liter. That is, the highest VOC Regulatory minus lowest VOC Regulatory of the group cannot exceed 25 grams/liter

If you have chosen to group products, you will provide ingredient information for the sales leader or the best representative product of the group.

QUESTION: Do you need gallon sales in 2013 to California only?

ANSWER: We need all sales, regardless of container size, for products sold in California in 2013. The survey requires the sales to be reported in gallons.

QUESTION: I'm not comfortable giving weight percent of ingredients, is there a range option?

ANSWER: No. Please be certain that any confidential information submitted is marked as such.

QUESTION: So if I sold a roof coating in California in 2013, I need to do this survey?

ANSWER: Yes, if you sold any architectural coatings in California in 2013, please complete the survey.

QUESTION: Will there be fines imposed on companies that do not complete this survey?

ANSWER: The survey is mandatory, and the California Air Resources Board does have the ability to impose fines for not completing the survey.

QUESTION: Is there a link to the instructions for the 2014 Survey?

ANSWER: Yes. The link is: www.arb.ca.gov/coatings/arch/survey/2014/2014survey.htm

QUESTION: How many files can be imported at one time? Does each product file and each ingredient file have to be imported one by one?

ANSWER: Although there is not a limitation on the number of files a company can import, companies will need to import two (2) files. Using the provided Microsoft Excel templates, companies will have a .csv file for the product information "form 2" and a .csv file for the ingredient information "form 3". These two files will contain the information regarding all the company's products formulation information. Therefore, there will not be a need to import information one product at a time.

QUESTION: Are you interested in collecting ingredient information of only those ingredients that would be considered volatile products?

ANSWER: The survey collects other ingredient information. In addition to gathering speciated ingredient information on volatile organic compounds (VOC) and exempt compounds present in the formulation in 0.1 weight percent or greater, we collect information on weight percent water, weight percent solids, weight percent aggregated VOCs less than 0.1 percent by weight, and weight percent aggregated exempt compounds less than 0.1 percent by weight.

QUESTION: Are the formula lists confidential or are they public?

ANSWER: Any confidential information should be marked as such when submitted, and the information will not be made public.

Questions on the ACRT

QUESTION: Is the company code assigned by the California Air Resources Board or is it something we assign?

ANSWER: The company code is assigned by the person responsible for completing the survey.

QUESTION: Will the forms be populated with information we have already submitted in our [previous] reporting?

ANSWER: The forms will be blank.

QUESTION: It looks like we are inputting the entire product formula, is that correct?

ANSWER: All the VOCs and exempt compounds present in 0.1 weight percent or greater must be listed individually on Form 3 (Ingredient Information Form). However, you can report aggregated VOCs that individually account for less than 0.1 weight percent of the final product as one sum. The same is true for exempt compounds that individually account for less than 0.1 weight percent. Solids are listed as a total weight percent, as is water.

QUESTION: How will the system handle two component products? I have a product where water and organics react into the mixture and do not evaporate into the air. The mass balance calculation won't work in this case.

ANSWER: Please make a note in the comment sections of Form 2 (Product Information Form) and Form 3 (Ingredient Information Form) regarding any special circumstances that might apply to your product.

QUESTION: Am I able to use generic ingredient identifiers such as "fillers" to identify non-volatile solids?

ANSWER: Yes. Please list all non-volatile solids as solids, and include the total weight percent solids as an aggregate.

QUESTION: Should manufacturers report dimethyl carbonate (DMC) and tertiary-butyl acetate (TBAC) as VOCs or as exempts?

ANSWER: These should be reported as VOCs.

Questions on Colorants

Please note: The 2014 Architectural Coatings Reporting Tool Instructions have been revised to provide clarification as to colorant reporting. Please refer to page 5 of the instructions.

QUESTION: If we add the colorants to our products (stain), but we are not the manufacturer of the colorants, so we then need to report in this manner (on the Colorant Information Form)?

ANSWER: No. If you are adding the colorant to the product prior to packaging it in sale units, you do not need to complete a Colorant Information Form. You would include any colorant information on the Ingredient Information Form, along with your other ingredients. The Colorant Information Form is to be completed only for those products tinted at point of sale.

QUESTION: Is the colorant information part of the product or different?

ANSWER: If the product is tinted at the point of sale, a Colorant Information Form would be completed. If the product is tinted prior to packaging in sale units, you would simply include any colorant ingredients with the rest of the reported ingredients on the Ingredient Information Form.

QUESTION: Since we are a manufacturer, isn't the colorant just another raw material (just solids or solvent)? Are we supposed to break the colorants out of the formula as a separate component?

ANSWER: Please see the answer to the previous question

QUESTION: We buy our pigments ready-made. Who reports our pigment purchases? Do we report the pigment or is it reported by the pigment manufacturer?

ANSWER: Manufacturers of colorants only are not required to report on the 2014 Survey, as the colorants will be reported by those using them to tint their coatings at point of sale. If you are using colorants to tint your products at the point of sale, you will need to complete the Colorant Information Form.

QUESTION: If colorants are not sold but rather used to tint product at company owned stores, do those colorants need to be reported since this is based on sales?

ANSWER: Yes. Any colorants used to tint coatings at the point of sale would be reported on the Colorant Information Form.

QUESTION: Do sellers of colorants have to report? Or is it up to the manufacturer to report?

ANSWER: Manufacturers of colorants do not need to complete the Colorant Information Form, unless that colorant manufacturer also uses the colorants to tint their own architectural coatings at the point of sale.

QUESTION: We re-sell some of the pigments we buy via small "pigment packs." Do I need to report these sales? We don't make our own pigments and these pigments might have already been reported by the pigment company we buy from.

ANSWER: No, you do not need to report any pigment packs you may re-sell. If the company who purchases these pigments uses them to tint their architectural coatings at the point of sale, they would report them using the Colorant Information Form. If they use them to tint their coatings prior to packaging in sale units, they would report them along with their other ingredients on the Ingredient Information Form.

Other Questions:

QUESTION: If a product that was sold in 2013 is no longer being sold, does it need to be reported in the survey?

ANSWER: Yes. The survey reporting period runs from January 1, 2013 to December 31, 2013.

QUESTION: If we are entering formula data for a two component product, do we enter the total (as used) formula which contains both parts A and B?

ANSWER: Yes. You would report all components of a multi-component product on one Product Information Form and one Ingredient Information Form, and the VOC content would be reported as mixed, applied, or fully reacted. The "VOC Regulatory" content as reported on the Product Information Form may differ from the VOCs as reported on the Ingredient Information Form.

QUESTION: Can products be grouped together for forms 2 and 3 if the composition is very similar, i.e. only difference is the gloss?

ANSWER: Products with differences in gloss levels cannot be grouped for reporting purposes. You may group products only if all of the following conditions are met:

- (1)The products belong to the same category (e.g., flats); and
- (2)The products have the same vehicle technology (i.e., solvent-borne or water-borne), resin type, substrate, interior or exterior use recommendation, and single – or multi-component form; and
- (3)VOC Regulatory range cannot exceed 25 grams/liter. That is, the highest VOC Regulatory minus lowest VOC Regulatory of the group cannot exceed 25 grams/liter

QUESTION: How do you account for cure volatiles in product classes such as Reactive Penetrating Sealers where the in-can is zero VOC? The VOCs are emitted upon reaction with the substrate.

ANSWER: If the coating contains silanes, siloxanes, or other ingredients that generate ethanol or other VOCs during the curing process, the VOC content must include the VOCs emitted during the curing process. This would be reported on the Product Information Form under "VOC Regulatory." The "VOC Regulatory" content as reported on the Product Information Form may differ from the VOCs as reported on the Ingredient Information Form. Please add comments to the comment field for any necessary explanation.