

**PROPOSED AMENDED RULE
1106 - MARINE AND PLEASURE
CRAFT COATING OPERATIONS**

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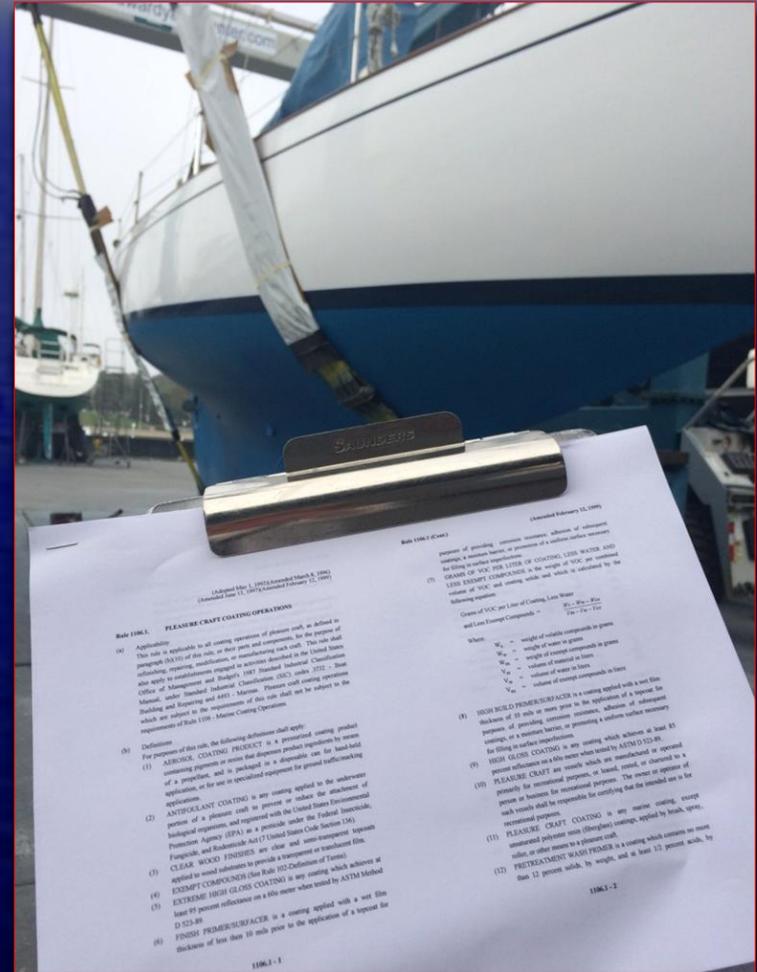
**PROPOSED RESCINDING OF
RULE 1106.1 - PLEASURE CRAFT
COATING OPERATIONS**

PUBLIC WORKSHOP

August 12, 2015

OUTLINE

- Purpose
- Proposal
- Other Impacts
- Rulemaking Schedule



PURPOSE

- ❑ Meet U.S. EPA RACT requirements
- ❑ Enhance Compliance
 - Observed non-compliance with products in use and on retail shelves
- ❑ Update VOC inventory for marine and pleasure craft coatings
- ❑ Clarification & consistency updates consistent with more recent Regulation XI coating rules



PROPOSAL

□ Enhance Rule Effectiveness:

- Rescind Rule 1106.1 - Pleasure Craft Coating Operations
- Subsume Rule 1106.1 into Rule 1106 - Marine Coating Operations
- Format VOC limits into two Tables of Standards, one for Marine and one for Pleasure Craft categories
{PAR1106 paragraphs (d)(1) & (d)(2)}
- Remove obsolete rule language
 - Out of date rule language not necessary

□ Enhance Enforceability:

- Add prohibitions for possession, specification and sales rule language {PAR1106 subdivision (e)}
- New “most restrictive” VOC limit rule language
{PAR1106 paragraph (d)(3)}

PROPOSAL (CONT)

□ Other:

- Align VOC limits with U.S. EPA CTG and other CA APCDs / AQMDs
{PAR1106 paragraphs (d)(1) & (d)(2)}
- Add transfer efficiency requirements
{PAR1106 subparagraphs (d)(8)(A) & (d)(8)(B)}
- Remove or amend touch-up definition and exemption
{PAR1106 paragraph (j)(2)}
- Add Purpose subdivision to Proposed Amended Rule 1106 {PAR1106 subdivision (a)}
- Add reporting provisions
{PAR1106 subparagraphs (g)(3)(A) & (g)(3)(B)}
- Make Updates and Editorial Corrections as necessary
- Initiate survey & reporting to update VOC inventory

OTHER IMPACTS

- CEQA analysis
 - Scheduled for release mid-August 2015

- Socioeconomic analysis
 - Impacts expected to be negligible



RULEMAKING SCHEDULE

- Working Group Meeting June 17, 2015
 - Received three comment letters
- SSC July 24, 2015
- Public Workshop August 12, 2015
 - Please submit comments by August 31, 2015
- Public Hearing October 2, 2015

