



South Coast Air Quality Management District

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Subject: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL ASSESSMENT

Project Title: PROPOSED AMENDED RULE 1113 – ARCHITECTURAL COATINGS

In accordance with the California Environmental Quality Act (CEQA), the South Coast Air Quality Management District (SCAQMD), as the Lead Agency, has prepared this Notice of Preparation (NOP) and Initial Study (IS). This NOP/IS serves two purposes: 1) to solicit information on the scope of the environmental analysis for the proposed project, and 2) to notify the public that the SCAQMD will prepare a Draft Environmental Assessment (EA) to further assess potential environmental impacts that may result from implementing the proposed project.

This letter, NOP and the attached IS are not SCAQMD applications or forms requiring a response from you. Their purpose is simply to provide information to you on the above project. If the proposed project has no bearing on you or your organization, no action on your part is necessary.

Comments focusing on issues relative to the environmental analysis for the proposed project should be addressed to Mr. Michael Krause (c/o Planning/CEQA) at the address shown above, or sent by FAX to (909) 396-3324 or by e-mail to mkrause@aqmd.gov. Comments must be received no later than 5:00 PM on February 22, 2006. If submitting comments, please include your name and phone number. Questions relative to the rule amendments should be directed to Mr. Dan Russell at (909) 396-2333.

The Public Hearing for the proposed amendments is scheduled for June 2, 2006 (subject to change).

Date: January 24, 2006

Signature: Steve Smith
Steve Smith, Ph.D.
Program Supervisor

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

21865 Copley Drive, Diamond Bar, CA 91765-4182

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL ASSESSMENT

Project Title:

Initial Study: Proposed Amended Rule 1113 – Architectural Coatings

Project Location:

South Coast Air Quality Management District: the four-county South Coast Air Basin (Orange County and the non-desert portions of Los Angeles, Riverside and San Bernardino counties) and the Riverside County portions of the Salton Sea Air Basin and the Mojave Desert Air Basin.

Description of Nature, Purpose, and Beneficiaries of Project:

The purpose of the proposed amendments to Rule 1113 is to reflect the findings of the recently completed Technology Assessment to the July 1, 2006 VOC limits of the rule and minimize emissions of ozone-forming VOCs from architectural coatings to the extent feasible. The proposed amendments to Rule 1113 would define tertiary butyl acetate as a non-VOC for specific coating categories, lower the VOC limits from specific coating categories, differentiate nonflat high gloss from the other nonflat coatings, and postpone the compliance date for nonflat high gloss coatings and quick-dry enamels by one year. The delay in emission reductions is expected to exceed the SCAQMD's VOC significance threshold and, therefore, will have a significant adverse impact on air quality.

Lead Agency:

South Coast Air Quality Management District

Division:

Planning, Rule Development and Area Sources

Initial Study and all supporting documentation are available at:

SCAQMD Headquarters
21865 Copley Drive
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or by calling:

(909) 396-2039

Initial Study is available by accessing the SCAQMD website at:

<http://www.aqmd.gov/ceqa/aqmd.html>

The Public Notice of Preparation is provided through the following:

☒ Los Angeles Times (January 24, 2006)

☒ SCAQMD Website

☒ SCAQMD Mailing List

Initial Study Review Period:

January 24, 2006 – February 22, 2006

Scheduled Public Meeting Dates (subject to change):

SCAQMD Governing Board Hearing: June 2, 2006

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

Initial Study:

Proposed Amended Rule 1113 – Architectural Coatings

January 24, 2006

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CHAPTER 1 - PROJECT DESCRIPTION

Introduction

California Environmental Quality Act

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INTRODUCTION

The California Legislature created the South Coast Air Quality Management District (SCAQMD) in 1977¹ as the agency responsible for developing and enforcing air pollution control rules and regulations in the South Coast Air Basin (Basin) and portions of the Salton Sea Air Basin and Mojave Desert Air Basin. By statute, the SCAQMD is required to adopt an air quality management plan (AQMP) demonstrating compliance with all federal and state ambient air quality standards for the areas over which the SCAQMD has jurisdiction.² Furthermore, the SCAQMD must adopt rules and regulations that carry out the AQMP.³ The 2003 AQMP concluded that major reductions in emissions of volatile organic compounds (VOCs) and oxides of nitrogen (NO_x) are necessary to attain the air quality standards for ozone and particulate matter less than 10 microns in size (PM₁₀).

Rule 1113 - Architectural Coatings was originally adopted by the AQMD on September 2, 1977, to regulate the VOC emissions from the application of architectural coatings, and has since undergone numerous amendments. Future VOC limits for many coating categories are to take effect on July 1 of 2006, 2007 and 2008. The current rule contains a requirement for staff to conduct a technology assessment prior to implementation of the lower limits.

As a result of the comprehensive technology assessment, summarized in the 2005 Annual Status Report on Rule 1113 – Architectural Coatings⁴ (Status Report), staff has developed the currently proposed amendments to Rule (PAR) 1113 to implement the recommendations from the Status Report. Public comments on the Status Report were considered in preparing the recommendations for amendments to Rule 1113.

The proposed amendments to Rule 1113 will allow the coating manufacturers to use tertiary butyl acetate (TBAC) as an exempt solvent in industrial maintenance (IM) Coatings, including zinc-rich industrial maintenance primers, and establish a new high-gloss nonflat coating category and postpone the 50 grams per liter (g/l) final VOC content limit by one year to July 1, 2007 for the high gloss nonflat and quick dry enamel coating categories. In addition, the proposed amendments will require lowering the VOC content limit for the following five existing coating categories: bond breakers, concrete-curing compounds, dry-fog coatings, fire-retardant coatings, and traffic coatings by July 1, 2007. These specific categories were identified by SCAQMD staff and National Paint and Coating Association (NPCA) as potential

¹ The Lewis-Presley Air Quality Management Act, 1976 Cal. Stats., ch 324 (codified at Health & Safety Code, §§40400-40540).

² Health & Safety Code, §40460 (a).

³ Health & Safety Code, §40440 (a).

⁴ Presented to the Governing Board at their January 6, 2006 meeting and can be accessed online at <http://www.aqmd.gov/hb/2006/060126a.html>

cost-effective means of offsetting the VOC emissions foregone due to the delay in implementation of the final VOC content limit for nonflat high gloss and quick-dry enamel categories. The delay in emission reductions is expected to exceed the SCAQMD's VOC significance threshold and, therefore, will have a significant adverse impact on air quality.

CALIFORNIA ENVIRONMENTAL QUALITY ACT

The proposed amendments to Rule 1113 are a "project" as defined by the California Environmental Quality Act (CEQA) Guidelines §15378. California Public Resources Code §21080.5 allows public agencies with regulatory programs to prepare a plan or other written document in lieu of an environmental impact report once the Secretary of the Resources Agency has certified the regulatory program. The SCAQMD's regulatory program was certified by the Secretary of the Resources Agency on March 1, 1989, and is codified as SCAQMD Rule 110.

CEQA requires that the potential adverse environmental impacts of proposed projects be evaluated and that feasible methods to reduce or avoid significant adverse environmental impacts of these projects be identified. To fulfill the purpose and intent of CEQA, the SCAQMD has prepared this initial study (IS) to identify potential adverse environmental impacts associated with amending Rule 1113. As noted above, since the air quality impacts are anticipated to be adversely significant, an EIR equivalent CEQA document will be prepared pursuant to SCAQMD's certified regulatory program and CEQA Guidelines §15252.

The purposes of the IS are to: provide the lead agency with the information to use as the basis for deciding whether to prepare a CEQA document with significant impacts (EIR equivalent) or a CEQA document with no significant impacts (Negative Declaration equivalent). If the lead agency decides, on the basis of preparing an initial study, that an EIR or EIR-equivalent CEQA document is warranted, the initial study assists in the preparation of the CEQA document by focusing on the effects determined to be significant, identifying effects not significant, and explaining the reasons for determining why potentially significant effects would not be significant. All comments received during the public comment period on the IS will be responded to and included in the Draft EA.

PROJECT LOCATION

PAR 1113 would apply to the SCAQMD's entire area of jurisdiction. The SCAQMD has jurisdiction over an area of 10,473 square miles (referred to hereafter as the district), consisting of the four-county South Coast Air Basin (Basin) and the Riverside County portions of the Salton Sea Air Basin (SSAB) and the Mojave

Desert Air Basin (MDAB). The Basin, which is a subarea of the SCAQMD's jurisdiction, is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The 6,745 square-mile Basin includes all of Orange County and the nondesert portions of Los Angeles, Riverside, and San Bernardino counties. The Riverside County portion of the SSAB and MDAB is bounded by the San Jacinto Mountains in the west and spans eastward up to the Palo Verde Valley. The federal nonattainment area (known as the Coachella Valley Planning Area) is a subregion of both Riverside County and the SSAB and is bounded by the San Jacinto Mountains to the west and the eastern boundary of the Coachella Valley to the east (Figure 1-1).

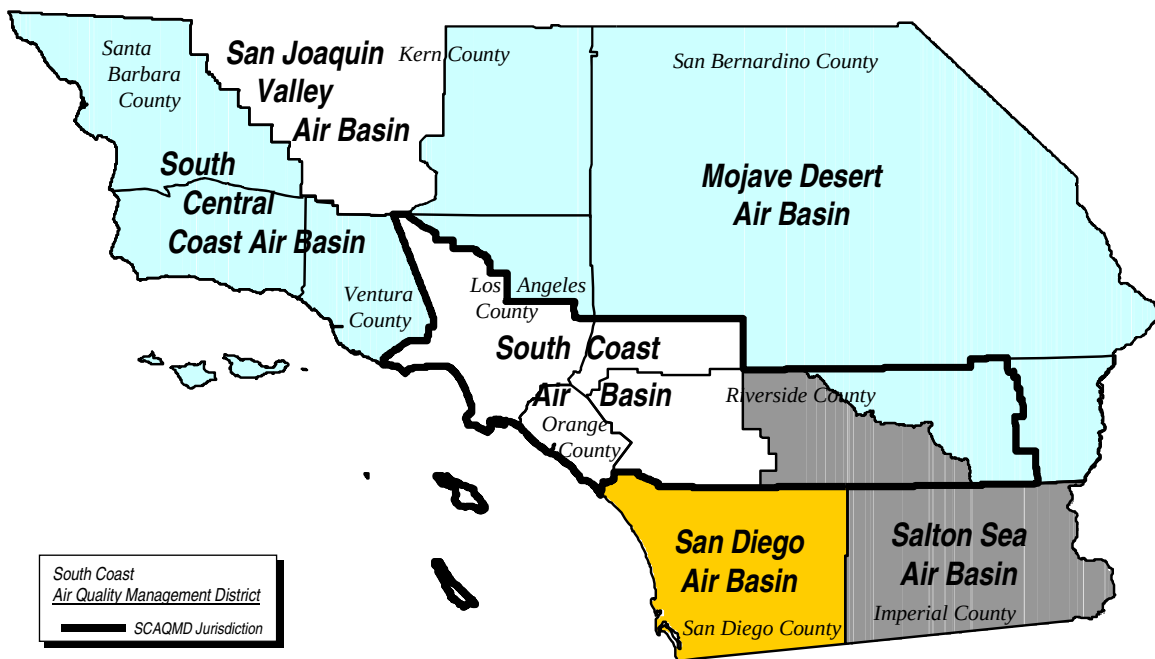


FIGURE 1-1

South Coast Air Quality Management District

PROJECT BACKGROUND

Architectural coatings, including IM coatings, are one of the largest non-mobile sources of VOC emissions in the district. Rule 1113 is applicable to manufacturers,

distributors, and end-users of architectural coatings. These coatings are used to enhance the appearance of and to protect homes, office buildings, factories and other structures, and their appurtenances on a variety of substrates. The coatings may be applied primarily by brush, roller, or spray gun; and those applying these coatings include homeowners, paint contractors, or maintenance personnel. Aerosol coatings are regulated by California Air Resource Board (CARB) and are therefore exempt from this rule.

The 2003 AQMP shows VOC emissions from the use of architectural coatings in 1997 at 50.9 tons per day (tpd) on an Annual Average Inventory and 60 tpd on the Summer Planning Inventory. The latest CARB architectural coating survey for year 2000 sales confirms the Annual Average Inventory by showing more than 50 tons per day of VOCs are attributed to the application of architectural coatings in the district based on demographics. Emissions for the architectural coatings source category for 2006 and 2010 are projected to be 32.7 tpd and 24 tpd respectively on the Annual Average Inventory, and 38.5 tpd and 28.3 tpd for 2006 and 2010 respectively on the Summer Planning Inventory.

VOC emissions contribute to the formation of ozone, PM 2.5 (particulate matter less than 2.5 microns) and PM10, three pollutants that exceed the state and national ambient air quality standards. They are the most serious regional air quality problems within the district and the most difficult to reduce to comply with healthful levels.

VOCs react photochemically with NO_x to form ozone. Ozone is a strong oxidizer that irritates the human respiratory system and damages plant life and property. VOCs also react in the atmosphere to form PM10, a pollutant that adversely affects human health and limits visibility. Because these small particulates penetrate into the deepest regions of the lung, they affect pulmonary function and have been linked to an increased morbidity and mortality.

Rule 1113 was first adopted in 1977, and has since undergone numerous amendments. When Rule 1113 was amended on November 8, 1996, it included an averaging compliance option (ACO) for complying with coating VOC limits. Under an ACO, manufacturers are allowed to average their emissions over a compliance period not to exceed one year provided they demonstrate their actual cumulative emissions from the averaged coatings are less than or equal to the cumulative emissions that would have been allowed under the VOC limits specified in the Rule 1113 Table of Standards. That version of Rule 1113 offered the averaging option for the flat coating category only. Further amendments to Rule 1113 on December 6, 2002, and December 5, 2003, added numerous other coating categories to the ACO provision to provide manufacturers additional compliance flexibility with the future VOC limits specified in the Rule 1113 Table of Standards. The 2004 amendments

addressed U.S. EPA concerns regarding the approvability of the ACO for the State Implementation Plan and the administration of the ACO Program.

Following the May 14, 1999 amendments to Rule 1113, the Governing Board directed staff to provide technical oversight and contribute funding to the Essential Public Service Agency (EPSA) technology assessment. SCAQMD staff formed a committee in September 1999 comprised of representatives from Metropolitan Water District (MWD), Department of Water Resources, Cal Trans and the Department of Water and Power to conduct a technology assessment for the EPSA's. The EPSA's primary responsibilities are to identify and test low-VOC IM coating products.

The scope of the program is being completed in multiple phases and is designed to test and evaluate VOC compliant coatings necessary for maintenance and new construction projects for agencies essential to the public. Approximately 150 VOC compliant industrial maintenance coating systems have already been applied and are undergoing environmental testing over a three to four year period.

The provisions in the CARB architectural coating suggested control measure (SCM) were developed by a consortium of California air pollution control districts, CARB, U.S. EPA Region IX, and paint manufacturers. The main provisions of the SCM, however, including the interim limits and the averaging provisions, were largely based the interim limits and the averaging provision of Rule 1113 as amended in May 1999.

During the course of Rule 1113 development, the SCAQMD Governing Board approved a workplan that requires staff to submit an annual status report summarizing issues and activities regarding the implementation of the rule. In addition, the rule requires technology assessments for specific coating categories. In preparing the annual status reports, staff has received input from the technical Advisory Committee made up of individuals from manufacturing companies, NPCA, CARB, a consulting and engineering firm, a painting contractor and several members from academia. The 2006 annual status reports and technology assessments completed to date indicate that great progress has been made toward developing future compliant products in practically all categories.

In 2005 at Chairman Dr. William Burke's request, the Governing Board established an Adhoc Committee for the purpose of providing an open forum to discuss key regulatory issues relative to the coatings industry and improving communication between the SCAQMD and the architectural coating industry to resolve current and future regulatory issues in a non-litigious manner. During the discussions, NPCA acknowledged the air quality challenges of the region and expressed their desire to submit an alternate proposal that would be emissions neutral.

TECHNOLOGY ASSESSMENT

The 1999 amendments to Rule 1113 require staff to conduct an annual technology assessment to assess the availability of coatings with future VOC limits. In addition, the rule requires staff to consider any applicable future CARB architectural coating surveys when assessing the availability of compliant products. After the technology assessment is completed, a status report on the appropriateness of the future VOC limits is required to be presented to the SCAQMD Board. The latest Annual Status Report on Rule 1113 was presented to the SCAQMD Board on January 6, 2006. A copy of the report is available on the SCAQMD's web-site (<http://www.aqmd.gov/hb/2006/060126a.html>) or from the SCAQMD's Public Information Center.

Highlights of the Annual Status Report on Rule 1113

Industrial Maintenance Coatings and the Use of TBAC in Formulation

The IM coating category has been part of many of the studies conducted by the SCAQMD and is considered to be the most challenging with regard to performance characteristics. Results of past studies indicate that coatings meeting the future limit of 100 g/l are currently available for the industrial maintenance coating category. Staff continues to obtain additional information on IM coatings from technical data sheet and material safety data sheet analysis. Included in that analysis are over 280 Industrial Maintenance Coatings (more than triple the number reported in the 2003 Status Report to the Board) that are well below the July 1, 2006 100 g/l VOC limit.

Various public service agencies have also tested low-VOC IM products in recent years and have found compliant products with acceptable performance for some applications. For example, SCAP conducted its own independent evaluation of IM coatings. Southern California Alliance of Publicly Owned Treatment Works is a non-profit corporation organized to help ensure that regulations affecting Publicly Owned Treatment Works are reasonable and in the public's best interest. Their testing of IM coatings was conducted to identify low-VOC coating systems suitable for wastewater treatment and conveyance facilities. Participants in this study included the Los Angeles County Sanitation District, the Orange County Sanitation District, the Eastern Municipal Water District, Las Virgenes Municipal Water District and the City of Los Angeles.

Southern California Alliance Of Publicly Owned Treatment Works evaluation of the performance of low-VOC atmospheric and immersion coating systems, completed in February 2003, indicated that compliant coating systems meeting the performance criteria for wastewater environments and the 2006 limits in Rule 1113, performed similarly to existing coating systems.

The MWD and EPSA continue to test new products that meet its very stringent internal standards for performance and that also meet the future VOC limit of 100 g/l. Typical IM coatings are expected to have a seven year longevity, whereas under the stringent performance standard established by MWD, an IM coating is expected to last at least 15 years under extreme environmental conditions. The testing completed by MWD is extremely critical in compiling the list of approved IM coatings that meet its stringent standards because the list is utilized by the EPSA. The testing to date indicates that:

- 1) Low-VOC “immersion” (immersion in water) IM coatings meeting the 2006 VOC content limits and conforming to MWD’s stringent performance standards that are currently available.
- 2) MWD continues to search for “atmospheric” IM products that comply with the 2006 VOC content limits and also meet the stringent performance standards.

SCAQMD staff recognizes that there is a lack of sufficient atmospheric IM coatings available that meet MWD’s and the EPSA’s rigorous standards. MWD has completed testing of some atmospheric IM coatings formulated using TBAC, a solvent that the U.S. EPA has delisted as a VOC. At the time EPA delisted TBAC as a VOC, it raised the issue of the potential toxicity of TBAC because one of its metabolites tert butyl alcohol (TBA) has been demonstrated to induce cancer in laboratory animals. In spite of the uncertainty regarding the toxicity of TBAC, the EPSA and some IM coating manufacturers are looking to the SCAQMD to delist TBAC for use in coatings that meet the stringent standards established for coatings used on public infrastructure. At the present time the availability of other non-VOC exempt solvents that could be used to manufacture compliant IM atmospheric coatings appears to be limited.

California EPA (Cal/EPA) conducted an environmental impact assessment pursuant to CEQA to determine the environmental impacts associated with granting an exemption for TBAC as a VOC in the CARB Consumer Products Regulation (Environmental Impact Assessment of Tertiary-Butyl Acetate, June 2006). CARB concluded that there were no significant impacts statewide associated with the exemption of TBAC as a VOC in the definition in the CARB Consumer Products Regulation. The environmental impact assessment further recommended that local regulatory agencies conduct their own analysis prior to exempting TBAC as a VOC in any applicable rule.

At the federal level, TBAC was given an exemption by U.S. EPA due to its low photochemical reactivity. As part of the federal delisting of TBAC, U.S. EPA requested that the manufacturer of TBAC commit to working with U.S. EPA to conduct the additional toxicity testing as necessary to resolve the long-term toxicity uncertainty of TBAC.

As recommended by CARB and required by CEQA, the Draft EA for PAR 1113 will analyze the short-term (acute) non-carcinogenic effects from a “worst case” scenario use of TBAC in IM coating applications based on the parameters of the health analysis provided by Cal/EPA. Since the application of architectural coatings does not occur continuously over a long period of time, carcinogenic risk and long-term (chronic) non-carcinogenic effects will not be analyzed since they are both based on long-term exposure.

Recent survey and tests have demonstrated that there are sufficient compliant coatings available on the market in the other architectural coating categories that will meet the VOC limits of Rule 1113 without the use of TBAC. As a result, given the uncertainties regarding the toxicity of TBAC, staff is not recommending at this time exempting TBAC from the definition of VOC for any coating category other than the limited exemption for IM coatings.

In response to the concerns regarding the potential toxicity of TBAC expressed during the PAR 1151 process, the SCAQMD has committed to conduct a technical assessment on the use of TBAC by July 1, 2007. Upon completion of this technical assessment, staff will report back to the Governing Board on the appropriateness of maintaining TBAC as a non-VOC. Until that time, the proposed limited exemptions for TBAC will maintain its potential risk at low levels, while providing some level of flexibility in developing compliant coatings.

New High Gloss Subcategory of Non Flat Coatings

Rule 1113 – Architectural Coatings, defines nonflat coatings as registering a gloss of five or greater on a 60-degree meter and a gloss of 15 or greater on an 85-degree meter. The current rule does not delineate various gloss ranges into distinct categories such as high, medium or low gloss.

Some coating manufacturers have requested that a high gloss category be developed in Rule 1113, similar to the 2000 CARB SCM for Architectural Coatings. In the SCM, high gloss coatings are those that register a gloss of 70 or above on a 60-degree meter and are allowed a higher VOC limit of 250 grams per liter. Appendix A in the 2006 Annual Status Report lists several high gloss coatings that are currently available and are below the 50 g/l limit that will be in effect in July 1, 2006, based on results from the technology assessment.

Several coating manufacturers have commented on expected performance for certain key characteristics such as dirt pickup. This issue is due to the softer resin technology used for 50 g/l products in the high gloss nonflat and the companion quick-dry enamel category. Subsequent discussions with other manufacturers indicated that with the latest resin and additive technologies, coating manufacturers were able to overcome the dirt pick up issue. Discussions with raw material

suppliers also reinforced the point of view that new resins that were recently made commercially available to the market will address these issues. Based on the state of technology, it appears that it is reasonable to expect that all manufacturers will be able to soon produce good performing products.

Despite this expressed concern with nonflat high gloss coatings, overall, the list of currently available super-compliant nonflats continues to grow as indicated by staff reviews and updates of information based on technical data sheets and material safety data sheets. There are currently over 50 coatings below 10 g/l (“super-compliant”) and a total of over 80 coatings below 50 g/l listed in Appendix A of the Annual Status Report. This is more than double the number of coatings listed in the report to the Board in December of 2003, indicating an increasing number of available compliant products. Consumers in the Do-It-Yourself (DIY) market purchase these compliant products for their personal use in and around their homes on a daily basis.

In spite of the increase in the availability of coatings in this category below 50 g/l, the rule still incorporates alternative compliance options, such as the averaging provision and an allowable three-year sell through provision for coating manufacturers to take advantage of.

The request to establish a high gloss category is based on the fact that some manufacturers may need additional time to formulate nonflat high gloss coatings using resins recently introduced into the market. In response to this industry request, SCAQMD staff is proposing to divide the nonflat coatings category, creating a new category specifically for nonflat high gloss coatings effective July 1, 2006 with a VOC limit of 150 g/l and modifying the future effective date for meeting the VOC limit of 50 g/l to July 1, 2007. To date, staff has found few low-VOC products meeting the definition of high gloss.

Quick-Dry Enamels

Quick-dry enamels, which are a subcategory of nonflats, are defined as having gloss values greater than 70 on a 60 degree meter, should be capable of achieving set-to-touch in at least two hours, dry-hard in at least eight hours and be tack-free in at least four hours. Due to a low number of products identified by staff that meet the definition of quick-dry enamels with a VOC content limit at or below 50 g/l, staff is proposing to establish an interim limit of 150 g/l effective July 1, 2006, and the postpone the final VOC content limit of 50 g/l to July 1, 2007, consistent with the nonflat high gloss category. This delay in the final compliance date is expected to provide additional time to allow coating formulators to formulate new or improved products using recently introduced resins. The technology assessment has demonstrated that the coatings formulated with these new resins will meet the consumers and industry demands for acceptable coating characteristics.

Existing Coating Categories Selected for Reduced VOC Content Limits

Bond Breakers

Bond breakers are coatings applied between layers of concrete to prevent the freshly poured top layer of concrete from bonding to the substrate over which it is poured. The primary use for this type of coating is in site-cast tilt-up concrete construction. Different types of resins are used in the formulations such as Oleoresinous binders, paraffin wax, polybutene and other polymer emulsions, acrylics and hydrocarbons. Most are chemically active meaning that they bond with the calcium in the fresh cement paste. The VOC limit for this category is currently 350 g/l and is proposed to be reduced to 100 g/l effective July 1, 2007, since there are adequate formulations currently available at or below this limit.

Concrete-Curing Compounds

Concrete-curing compounds are coatings applied to freshly poured concrete to retard the evaporation of water promoting the optimum cement hydration immediately after placement. As cement hydrates, strength increases and permeability decreases. When hydration stops, strength gain ceases. Resins include acrylic, acrylic copolymer, alkyd, phenolic, calcium nitrate, hydrocarbon, lignosulfonate, silicate, sodium silicate, wax, styrene acrylate, and polystyrene. The VOC limit for this category is currently 350 g/l and is proposed to be reduced to 100 g/l effective July 1, 2007, since there are adequate formulations currently available at or below this limit.

Dry-Fog Coatings

Dry-fog coatings are applied by spray application so that the overspray droplets dry before falling on floors and other surfaces. Resins include acrylic, acrylic copolymer, alkyd amines epoxy, vinyl toluene, and vinyl acrylic copolymer. The VOC limit for this category is currently 400 g/l and is proposed to be reduced to 100 g/l effective July 1, 2007, since there are adequate formulations currently available at or below this limit.

Fire-Retardant Coatings

Fire-retardant coatings retard ignition and flame spread. The coating has to be fire tested and rated by a testing agency approved by building code officials for use in bringing building and construction materials into compliance with federal, state, and local building code requirements. The fire-retardant coating and the testing agency must be approved by building code officials. The coating must be tested in accordance with ASTM Test Method E-89 or listed by Underwriter's Laboratories, Inc., as a fire-retardant coating with a flame spread index of less than 25. Resins include acrylic, acrylic copolymer amines, poly vinyl acetate, urethane, polyurethane, and vinyl acrylic copolymer. The VOC limits for this category are currently divided

into clear coatings at 650 g/l and pigmented coatings at 350 g/l with both proposed to be reduced to 50 g/l effective July 1, 2007, because compliant coatings have been found to be available.

Traffic Coatings

Traffic coatings are applied to public streets, highways, and other surfaces such as curbs, berms, driveways, and parking lots. Resins include acrylic, acrylic copolymer, alkyd, oleoresin, vinyl toluene, and vinyl acrylic copolymer. The VOC limit for this category is currently 150 g/l and is proposed to be reduced to 100 g/l effective July 1, 2007, because compliant coatings are currently available.

PROJECT DESCRIPTION

The proposed amendments to Rule 1113 include the following:

- Amend the definition for floor coatings to include clear floor coatings, except for IM coatings and clear wood finishes. This clarification is necessary to keep the intent of the original definition which included both opaque and clear coatings.
- Add a new definition for nonflat high gloss by separating this category from the general nonflat category.
- Extend the VOC limit effective date for nonflat high gloss coatings from July 1, 2006 to July 1, 2007.
- Modify the definition of VOC to exclude TBAC when used in formulating IM coatings and zinc-rich industrial maintenance primers.
- Remove the requirement to submit an annual report to the Executive Officer for the following specialty coating categories: clear brushing lacquers, rust preventative coatings and special primers. These coatings have or will be subsumed by July 1, 2006, into the lower VOC general coating categories lacquer; nonflat; and primer, sealer, undercoater; respectively.
- Change the VOC limit of 50 g/l for quick-dry enamels to 150 g/l effective July 1, 2006, and implement the limit of 50 g/l effective July 1, 2007.
- In the Table of Standards in paragraph (c)(2), reduce the VOC content limits to 100 g/l for bond breakers, concrete-curing compounds, dry-fog coatings and traffic coatings, and to 50 g/l for fire retardant coatings effective July 1, 2007.

- Update administrative requirements such as outdated labeling requirements for brushing lacquers, technology assessments and acronyms.

Table 1-1 outlines the current and proposed VOC content limits for the affected coating categories. A detailed version of PAR 1113 can be found in Appendix A.

TABLE 1-1

Current and Proposed VOC Content Limits
(grams of VOC per liter of coating, less water and less exempt compounds)

COATING TYPE	Current Limit*	Effective Date	Effective Date
		7/1/06	7/1/07
Bond Breakers	350		100
Concrete-Curing Compounds	350		100
Dry-Fog Coatings	400		100
Fire-Retardant Coatings			
Clear	650		50
Pigmented	350		50
Nonflat Coatings, High Gloss	150		50
Quick-Dry Enamels	250	150	50
Traffic Coatings	150		100

ALTERNATIVES

The Draft EA will discuss and compare the relative merits of alternatives to the proposed project as required by CEQA and by SCAQMD Rule 110 when there are significant adverse impacts. Alternatives must include realistic measures for attaining the basic objectives of the proposed project and provide a means for evaluating the comparative merits of each alternative. Alternatives are typically designed to mitigate the significant adverse environmental impacts of the project. In addition, the range of alternatives must be sufficient to permit a reasoned choice and it need not include every conceivable project alternative. The key issue is whether the selection and discussion of alternatives fosters informed decision making and public participation. A CEQA document need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative. Suggestions on alternatives submitted by the public will be evaluated for inclusion in the Draft EA.

As mentioned previously, NPCA acknowledged the air quality challenges of the region and has submitted an alternative to the proposed project that is intended to be emissions neutral. The NPCA proposal will be considered an alternative to the

proposed project and would be evaluated in the Draft EA in accordance with the requirements of CEQA. The current NPCA proposal to the proposed amendment to Rule 1113 expands the number of coating categories, maintains the current limits and deletes the future effective limits for those categories. The NPCA proposal also advances the future limit for a portion of the flat coatings category. The NPCA proposal will result in significant foregone emission reductions from the current Rule 1113.

SCAQMD Rule 110 does not impose any greater requirements for a discussion of project alternatives in an environmental assessment than is required for an Environmental Impact Report under CEQA. Alternatives will be developed based in part on the major components of the proposed rule. The rationale for selecting alternatives rests on CEQA's requirement to present "realistic" alternatives; that is alternatives that can actually be implemented. CEQA also requires an evaluation of a "No Project Alternative." Written suggestions on potential project alternatives received during the comment period for the Initial Study will be considered when preparing the Draft EA.

CHAPTER 2 - ENVIRONMENTAL CHECKLIST

Introduction

General Information

Potentially Significant Impact Areas

Determination

Environmental Checklist and Discussion

INTRODUCTION

The environmental checklist provides a standard evaluation tool to identify a project's adverse environmental impacts. This checklist identifies and evaluates potential adverse environmental impacts that may be created by the proposed amendments to SCAQMD Rule 1113 – Architectural Coatings.

GENERAL INFORMATION

Project Title:	Proposed Amended Rule 1113 – Architectural Coatings
Lead Agency Name:	South Coast Air Quality Management District
Lead Agency Address:	21865 Copley Drive Diamond Bar, CA 91765
CEQA Contact Person:	Michael A. Krause (909) 396-2706
Rule Contact Person:	Dan Russell (909) 396-2333
Project's Sponsor Name:	South Coast Air Quality Management District
Project's Sponsor Address:	21865 Copley Drive Diamond Bar, CA 91765
General Plan Designation:	Not Applicable
Zoning:	Not Applicable
Description of Project:	The proposed amendments to Rule 1113 would define tertiary butyl acetate as a non-VOC on a limited basis, lower the VOC limits from specific coating categories, differentiate nonflat high gloss from the other nonflat coatings, postpone the compliance date for nonflat high gloss coatings and quick-dry enamels by one year and other minor clarifications.
Surrounding Land Uses and Setting	Not Applicable
Other Public Agencies Whose Approval is Required:	Not Applicable

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The following environmental impact areas have been assessed to determine their potential to be affected by the proposed project. Any checked items represent areas that may be adversely affected by the proposed project. An explanation relative to the determination of impacts can be found following the checklist for each area.

- | | | |
|---|--|--|
| ☐ Aesthetics | ☐ Geology and Soils | ☐ Population and Housing |
| ☐ Agricultural Resources | ☐ Hazards and Hazardous Materials | ☐ Public Services |
| ☒ Air Quality | ☐ Hydrology and Water Quality | ☐ Recreation |
| ☐ Biological Resources | ☐ Land Use and Planning | ☐ Solid/Hazardous Waste |
| ☐ Cultural Resources | ☐ Mineral Resources | ☐ Transportation./Traffic |
| ☐ Energy | ☐ Noise | ☐ Mandatory Findings |

DETERMINATION

On the basis of this initial evaluation:

- ☐ I find the proposed project, in accordance with those findings made pursuant to CEQA Guideline §15252, COULD NOT have a significant effect on the environment, and that an ENVIRONMENTAL ASSESSMENT with no significant impacts will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will NOT be significant effects in this case because revisions in the project have been made by or agreed to by the project proponent. An ENVIRONMENTAL ASSESSMENT with no significant impacts will be prepared.
- ☒ I find that the proposed project MAY have a significant effect(s) on the environment, and an ENVIRONMENTAL ASSESSMENT will be prepared.
- ☐ I find that the proposed project MAY have a "potentially significant impact" on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL ASSESSMENT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL ASSESSMENT pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL ASSESSMENT, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Date January 24, 2006

Signature: _____

Steve Smith

Steve Smith, Ph.D.
Program Supervisor

ENVIRONMENTAL CHECKLIST AND DISCUSSION

	Potentially Significant Impact	Less Than Significant Impact	No Impact
I. AESTHETICS. Would the project:			
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒

SIGNIFICANCE CRITERIA

The proposed project impacts on aesthetics would be considered significant if:

- The project will block views from a scenic highway or corridor.
- The project will adversely affect the visual continuity of the surrounding area.
- The impacts on light and glare will be considered significant if the project adds lighting which would add glare to residential areas or sensitive receptors.

DISCUSSION

- I. a): The proposed amendments do not require any changes in the physical environment that would obstruct any scenic vistas or views of interest to the public. In addition, no major changes to existing architectural coatings operations or stockpiling of additional materials or products outside of existing facilities are expected. The reason for this

determination is that the proposed project is not expected to produce any physical changes because PAR 1113 is expected only to alter the formulation of specific architectural coatings. Coatings subject to PAR 1113 for use on an architectural structure is anticipated to improve the aesthetic view of that structure. Therefore, no significant impacts adversely affecting existing visual resources such as scenic views or vistas, etc. are anticipated to occur.

- I. b), c): No new construction of buildings or other structures will result from the lowering of the VOC content in coatings so scenic resources will not be obstructed and the existing visual character of any site in the vicinity of affected operations will not be degraded. The purpose of architectural and industrial maintenance (AIM) coatings is to improve the visual character and protect the surface of the substrate upon which the coating is applied. Defects in the appearance of the low-VOC coating after application, which could be argued as less aesthetically pleasing, is not anticipated because the rule contains a compliance schedule sufficient for coating formulators to produce acceptable quality low-VOC products that exhibit the desired performance characteristics. In addition, compliant low-VOC coatings are currently available for most affected coating categories and are currently being sold and used and have been demonstrated to be as durable as coatings formulated with conventional solvents.
- I. d): There are no components in PAR 1113 that would alter existing work practices, or require coating activities at night. Therefore, PAR 1113 is not expected to create a new source of substantial light or glare that would adversely affect day or nighttime views in an area.

Based on the above considerations, significant adverse impacts to aesthetics are not expected from PAR 1113. Since there are no significant adverse impacts, no mitigation measures are required and this environmental topic will not be further analyzed in the draft EA.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
II. AGRICULTURE RESOURCES. Would the project:			
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland mapping and Monitoring Program of the California Resources Agency, to non- agricultural use?	☐	☐	☒

- | | | | | |
|----|--|--------------------------|--------------------------|-------------------------------------|
| b) | Conflict with existing zoning for agricultural use, or a Williamson Act contract? | ☐ | ☐ | ☒ |
| c) | Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use? | ☐ | ☐ | ☒ |

SIGNIFICANCE CRITERIA

Project-related impacts on agricultural resources would be considered significant if any of the following conditions are met:

- The proposed project conflicts with existing zoning or agricultural use or Williamson Act contracts.
- The proposed project will convert prime farmland, unique farmland or farmland of statewide importance as shown on the maps prepared pursuant to the farmland mapping and monitoring program of the California Resources Agency, to non-agricultural use.
- The proposed project would involve changes in the existing environment, which due to their location or nature, could result in conversion of farmland to non-agricultural uses.

DISCUSSION

II. a) - c): As discussed under Aesthetics, no major construction is associated with the lowering of the VOC content of affected coating categories. Further, the coating activities would occur at existing industrial or commercial areas. Therefore, the proposed project would not result in any construction of new buildings or other structures that would convert farmland to non-agricultural use or conflict with zoning for agricultural use or a Williamson Act contract. Since the proposed project would not substantially change the equipment or process in which the coatings are applied, there are no provisions in the proposed amended rule that would convert farmland to non-agricultural uses, thus, affecting land use plans, policies, or regulations. Land use and other planning considerations are determined by local governments and no land use or planning requirements will be altered by the proposed project.

Based on the above considerations, significant adverse impacts to agriculture resources are not expected from PAR 1113. Since there are no significant adverse impacts, no

mitigation measures are required and this environmental topic will not be further analyzed in the draft EA.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
III. AIR QUALITY. Would the project:			
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒
b) Violate any air quality standard or contribute to an existing or projected air quality violation?	☒	☐	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?	☐	☐	☒
d) Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐
e) Create objectionable odors affecting a substantial number of people?	☒	☐	☐
f) Diminish an existing air quality rule or future compliance requirement resulting in a significant increase in air pollutant(s)?	☒	☐	☐

SIGNIFICANCE CRITERIA

Impacts will be evaluated and compared to the significance criteria in Table 2-1. If impacts equal or exceed any of the following criteria, they will be considered significant.

TABLE 2-1
Air Quality Significance Thresholds

Mass Daily Thresholds ^a		
Pollutant	Construction	Operation
NOx	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM10	150 lbs/day	150 lbs/day
SOx	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
Toxic Air Contaminants (TACs) and Odor Thresholds		
TACs (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Hazard Index ≥ 1.0 (project increment) Hazard Index ≥ 3.0 (facility-wide)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
Ambient Air Quality for Criteria Pollutants ^b		
NO2 1-hour average annual average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.25 ppm (state) 0.053 ppm (federal)	
PM10 24-hour average annual geometric average annual arithmetic mean	10.4 µg/m ³ (recommended for construction) ^c 2.5 µg/m ³ (operation) 1.0 µg/m ³ 20 µg/m ³	
Sulfate 24-hour average	1 ug/m ³	
CO 1-hour average 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) 9.0 ppm (state/federal)	

^a SCAQMD CEQA Handbook (SCAQMD, 1993)

^b Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, Table A-2 unless otherwise stated.

^c Ambient air quality threshold based on SCAQMD Rule 403.

KEY: lbs/day = pounds per day ppm = parts per million $\mu\text{g}/\text{m}^3$ = microgram per cubic meter $\geq$ greater than or equal to

DISCUSSION

III. a): PAR 1113 would not conflict with or obstruct, air quality plan implementation but rather implement, in part, control measure CTS-07 from the 2003 AQMP, which was

developed for the primary purpose of controlling emissions to attain and maintain all federal and state ambient air quality standards for the district. The 2003 AQMP concluded that major reductions in emissions of VOC and NO_x are necessary to attain the air quality standards for ozone and PM₁₀. VOC emissions contribute to the formation of ozone and PM₁₀, two pollutants that exceed the state and national ambient air quality standards. VOCs react photochemically with NO_x to form ozone. Ozone is a strong oxidizer that irritates the human respiratory system and damages plant life and property. VOCs also react in the atmosphere to form PM₁₀, a pollutant that adversely affects human health and limits visibility. Because these small particulates penetrate into the deepest regions of the lung, they affect pulmonary function and have even been linked to increased morbidity and mortality. The net affect of implementing PAR 1113 is that VOC emissions from this source category will be reduced 1,620 pounds per day thus providing an eventual overall direct air quality benefit. This VOC emission reduction will assist the SCAQMD's progress in attaining and maintaining the ambient air quality standards for ozone and, although there is a delay in emission reductions, the proposed project will not obstruct with the goals of the AQMP since the overall air quality benefit will be achieved in 2007 when the next AQMP is expected to be promulgated and implemented.

- III. b) and f): To determine whether or not air quality impacts from adopting and implementing the proposed amendments are significant, impacts will be evaluated and compared to the criteria in Table 2-1. If impacts equal or exceed any of the criteria in Table 2-1, they will be considered significant. All feasible mitigation measures will be identified and implemented to reduce significant impacts to the maximum extent feasible. By delaying compliance with some existing architectural coating categories, the amendments to the existing air quality Rule 1113 and its future compliance requirements will result in a delay in anticipated VOC emission reductions that exceed the SCAQMD daily operational VOC significance threshold of 55 pounds per day. In order to determine the amount of increase, the existing VOC emission inventory of the affected coating categories needs to be determined to compare with the overall emission reduction. The following discussion provides the data necessary to determine the significance of the air quality impact from PAR 1113.

VOC Emission Inventory for Affected Coating Categories

To establish an emission inventory for the architectural coatings source category, SCAQMD staff relies on air quality data provided by CARB. CARB gathers air quality data for the state of California, ensures the quality of this data, designs and implements air models, and sets ambient air quality standards. CARB compiles the state emissions inventory and performs air quality and emissions inventory special studies. CARB uses the emissions inventory and air quality models to evaluate air quality which is then used by the local air agencies to reduce emissions in each of the 35 local air basins.

Table 2-2 summarizes the 2000 emissions inventory for both California and the district and with the assumption that 45 percent of the state sales are within the AQMD jurisdiction.

TABLE 2-2
2000 California and SCAQMD Emission Inventory

	California		District	
Coating Category - Proposed VOC Content Limit (grams/liter)	Sales	Emission Inventory	VOC Emission Inventory	
	Gallons	Tons per year	Tons per year	Tons per day
Bond Breakers – 100	67,308	22.56	10.15	0.03
Concrete-Curing Compounds – 100	359,428	112.56	50.65	0.14
Dry-Fog Coatings – 100	305,557	385.19	173.33	0.47
Fire-Retardant Coatings – 50	PD*	5.33	2.40	0.01
Nonflat, High Gloss – 150	1,961,924	549.22	247.15	0.68
Quick-Dry Enamel – 150	932,806	439.06	197.58	0.54
Quick-Dry Enamel – 50	828,113	234.60	105.58	0.29
Traffic coatings – 100	2,249,225	838.65	838.65	1.03
Totals	6,704,361	1,364.28	613.93	1.68

* PD is protected data, fewer than 3 companies reported sales

Delay of Emission Reductions and Future Emission Reductions

There are two purposes for amending Rule 1113. First, PAR 1113 would allow additional time for manufacturers to formulate compliant products for specific coating categories. The VOC emission reductions postponed for one year from the nonflat, high gloss category will be 960 pounds per day and from the quick-dry enamel category, 400 pounds per day. Thus, the total delay in VOC emission reductions will be 1,360 pounds per day but will be temporary and last only until July 1, 2007 when the original lower VOC content limits are required to be met. On July 1, 2007, all originally anticipated VOC emission reductions from nonflat, high gloss coatings and quick-dry enamels will be achieved. Consequently, PAR 1113 will diminish existing air quality, but for only one year.

The second purpose for amending Rule 1113 is to further reduce VOC emissions, which contribute to ozone and PM₁₀ formation. PAR 1113 is expected to achieve an overall VOC emission reduction of 1,620 pounds per day from bond breakers, concrete-curing compounds, dry-fog coatings, fire-retardant coatings and traffic coatings beginning July 1, 2007. These reductions will be permanent and will provide an overall air quality benefit to the district. Table 2-3 summarizes the

estimated delay in VOC emission reductions as well as the future emission reductions from PAR Rule 1113 beyond the current rule.

TABLE 2-3

Estimated Delay of Emission Reductions and
Future Emission Reductions from the Proposed Project

Coating Category	Proposed VOC Content Limit (grams/liter)	Delay VOC Emissions Reductions (pounds per day)	VOC Emission Reductions (pounds per day) as of July 1, 2007
Bond Breakers	100		40
Concrete-Curing Compounds	100		180
Dry-Fog Coatings	100		800
Fire-Retardant Coatings	50		20
Nonflat, High Gloss Coatings*	50	960	
Quick-Dry Enamel*	150/50	400	
Traffic Coatings	100		580
Total		1,360	1,620

* The emission reductions from these categories have been accounted for in prior rule amendments.

Since the delay in VOC emission reductions in year 2006 exceeds the SCAQMD's daily VOC significance threshold, the impact to air quality will be significant. This significant adverse impact, however, will only be temporary for one year as the original VOC content limits will be required to be met by July 1, 2007.

- III. c): The cumulative air quality impacts from the proposed amendments will be analyzed in the Draft EA.
- III. d) The potential pollutant concentrations impacts from the exposure of TBAC to sensitive receptors will be further analyzed in the Draft EA. The short-term (acute) non-carcinogenic effects from a "worst case" scenario use of TBAC in IM coating applications will be based on the parameters of the health analysis provided by Cal/EPA. Since the application of architectural coatings does not occur continuously over a long period of time, carcinogenic risk and long-term (chronic) non-carcinogenic effects will not be analyzed since they are both based on long-term exposure. The analysis would also include a comparison of toxic impact from solvents currently used to formulate coating affected by PAR 1113 (bond breakers, concrete curing, dry fog, fire retardants and traffic coatings) to the solvents used in reformulating new compliant lower VOC coatings. Table 2-4 lists typical solvents found in affected coatings at the current VOC content limits and solvents found in the reformulated lower-VOC coatings, along with the high weight percent of the solvents

in the formulations. This data was compiled from MSDS sheets of affected coatings from a variety of coating manufacturers. Further, it should be noted that MSDS sheets do not always lists all the solvents used in coating formulations but rather highlight the potentially hazardous solvents.

TABLE 2-4

Typical Solvents Found in Affected Coatings at Current and Lower-VOC Limits

		AFFECTED COATING CATEGORIES				
		Bond Breakers	Concrete Curing	Dry Fog	Fire Retardant	Traffic
VOC Content		350 g/l	350 g/l	400 g/l	350 g/l	150 g/l
Existing Solvents	CAS No.	Weight Percent (High)				
Ethylene glycol	107211	10	10			1.46
Stoddard solvent	8052413	2.5	25		25	
Solvent naphtha	64742956	1	5			
1,2,4-Trimethylbenzene	95636	1	5			
Mesitylene	108678	1				
Propylene glycol phenyl ether	770354		5			
Diethylene glycol	111466		5			
Hydrocarbon polymer	68527253		28			
Alpha methyl styrene	9011114		35			
VM&P naphtha	8032324					
Petroleum distillates	8002059				25	
Mineral Spirits	64742887					
Isopropanol	67630					
p-Chlorobenzotrifluoride	98566				8	
Methanol	67561					2.89
Texanol ester alcohol	25265774					2
Denatured ethanol	64175					5
		Bond Breakers	Concrete Curing	Dry Fog	Fire Retardant	Traffic
VOC Content		100 g/l	100 g/l	100 g/l	50 g/l	100 g/l
Replacement Solvents	CAS No.	Weight Percent (High)				
Ethylene glycol	107211	10		10		10
Stoddard solvent	8052413	2.5	2.5			
Solvent naphtha	64742956	1			5	
1,2,4-Trimethylbenzene	95636	1			5	
Mesitylene	108678	1				

TABLE 2-4 (CONCLUDED)

Typical Solvents Found in Affected Coatings at Current and Lower-VOC Limits

VOC Content		AFFECTED COATING CATEGORIES				
		Bond Breakers	Concrete Curing	Dry Fog	Fire Retardant	Traffic
		100 g/l	100 g/l	100 g/l	50 g/l	100 g/l
Replacement Solvents	CAS No.	Weight Percent (High)				
Glycol ether DB	111762		4	1		
Epoxy resin	25068386		70			
Acrylic polymer			28			
Sodium glucoheptonate	31138655		60			
Propylene glycol phenyl ether	770354		5			
Diethylene glycol montobutyl ether	112345			5		2
VM&P naphtha	8032324			30		
Propylene glycol	57556			5		5
Texanol ester alcohol	25265774			5		5
Isopropanol	67630			2		5
Styrene acrylic copolymer				20		5
Methanol	67561			1	0.5	2.5
Vinyl Acetate	108054				1	
Ethylbenzene	100414				5	0.5
Formaldehyde	50000				1	
Acetone	67641					26
Denatured ethanol	64175					

- III. e): Historically, the SCAQMD has enforced odor nuisance complaints through SCAQMD Rule 402 - Nuisance. PAR 1113 will require the reduction of the VOC content limit from various coating categories which will require coating manufacturers to formulate with solvents that emit less VOC. The proposed amendments will also classify TBAC as an exempt solvent for IM coatings and zinc-rich maintenance primers. To comply with the lower VOC content limits, some architectural coatings will be water-based. Water-based coatings have less solvent than existing solvent-based coatings. Based on site visit comparison between a solvent-based coating manufacturing facility and a water-based coating manufacturing facility, facilities that convert to water-based coatings are assumed to have a beneficial effect on nuisance odor. However, due to the re-classification of

TBAc, PAR 1113 could increase the amount of exempt solvents used for two coating categories that might not be reformulated using water-based formulations.

Affected facilities are not expected to create objectionable odors affecting a substantial number of people for the following reasons: 1) the coating of an architectural structure is temporary and typically not in great quantities; 2) the use of any new compliant materials are generally expected to replace existing architectural coating materials such that there will no additional odors generated; 3) the use of future compliant materials must comply with all applicable SCAQMD rules and regulations; and, 4) some of the future compliant coatings with lower VOC contents may actually result in lower odor impacts compared to the current coatings in use.

In order to determine the extent of the potential odor impact from the proposed rule, an odor analysis will need to be conducted to compare the conventional solvents with the lower VOC formulations, including TBAc.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES. Would the project:			
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒
c) Have a substantial adverse effect on federally protected wetlands as defined by §404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through	☐	☐	☒

direct removal, filling, hydrological interruption, or other means?

- | | | | | |
|----|---|--------------------------|--------------------------|-------------------------------------|
| d) | Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | ☐ | ☐ | ☒ |
| e) | Conflicting with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | ☐ | ☐ | ☒ |
| f) | Conflict with the provisions of an adopted Habitat Conservation plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | ☐ | ☐ | ☒ |

SIGNIFICANCE CRITERIA

Impacts on biological resources would be considered significant if any of the following criteria apply:

- The project results in a loss of plant communities or animal habitat considered to be rare, threatened or endangered by federal, state or local agencies.
- The project interferes substantially with the movement of any resident or migratory wildlife species.
- The project adversely affects aquatic communities through construction or operation of the project.

DISCUSSION

IV. a), b), d): Implementation of the proposed amendments will not cause impacts to sensitive habitats of plants or animals because they do not require acquisition of or construction on open space areas. The overall intent of the proposed amendments is to reduce VOC emissions from affected coating categories. Therefore, the proposed amendments to Rule 1113 will have no direct or indirect impacts that could adversely affect plant or animal species or the habitats on which they rely in the SCAQMD's

jurisdiction. The overall net effect of implementing the proposed amended rule will be improved air quality resulting from reduced VOC emissions, which is expected to be beneficial for both plant and animal life. Modifications at existing affected coating manufacturers to switch to low-VOC coatings, such as water-based, would not require acquisition of additional land or further conversions of riparian habitats or sensitive natural communities where endangered or sensitive species may be found.

IV. c): Acquisition of protected wetlands is not expected to be necessary to switch to compliant coatings, such as water-based coatings. Affected coating contractors would continue to practice existing operating procedures so the proposed amended rule will not directly remove, fill or interrupt any hydrological system or have an adverse effect on federally protected wetlands. Since coating contractors typically operate in urbanized areas, it is not likely that disposal or accidental releases of coating materials would occur in areas that harbor federally protected wetlands as defined by §404 of the Clean Water Act.

IV. e), f): There are no provisions in the proposed amended rule that would adversely affect land use plans, local policies or ordinances, or regulations because the ultimate effect of PAR 1113 is to reduce VOC emissions from architectural coatings. Land use and other planning considerations are determined by local governments and no land use or planning requirements will be altered by the proposed project. Proposed amended Rule 1113 would not affect in any way habitat conservation or natural community conservation plans, agricultural resources or operations, and would not create divisions in any existing communities.

Based on the above consideration, significant adverse impacts to biological resources are not expected from PAR 1113. Since there are no significant adverse impacts, no mitigation measures are required and this environmental topic will not be further analyzed in the draft EA.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES. Would the project:			
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☒
b) Cause a substantial adverse change in the	☐	☐	☒

significance of an archaeological resource as defined in §15064.5?

- | | | | |
|---|--------------------------|--------------------------|-------------------------------------|
| c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | ☐ | ☐ | ☒ |
| d) Disturb any human remains, including those interred outside a formal cemeteries? | ☐ | ☐ | ☒ |

SIGNIFICANCE CRITERIA

Impacts to cultural resources would be considered significant if:

- The project results in the disturbance of a significant prehistoric or historic archaeological site or a property of historic or cultural significance to a community or ethnic or social group.
- Unique paleontological resources are present that could be disturbed by construction of the proposed project.
- The project would disturb human remains.

DISCUSSION

V. a) - d): There are existing laws in place that are designed to protect and mitigate potential impacts to cultural resources. PAR 1113 is not expected to affect archeological or cultural sites because reformulation of architectural coatings won't require major construction activities such as grading, trenching, etc. The application of architectural coatings typically occurs after site preparation and construction of structures has been completed. As a result, it is expected that archaeological resources would have already been assessed or if the new structure is at an existing residential, commercial or industrial site, then they have already been disturbed or protected. The proposed revisions to Rule 1113 are, therefore, not anticipated to result in any activities, or promote any programs that could have a significant adverse impact on cultural resources in the district. As a result, the proposed project has no potential to cause a substantial adverse change to a historical or archaeological resource, directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, or disturb any human remains, including those interred outside a formal cemeteries.

Based on the above consideration, significant adverse impacts to cultural resources are not expected from PAR 1113. Since there are no significant adverse impacts, no

mitigation measures are required and this environmental topic will not be further analyzed in the draft EA.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
VI. ENERGY. Would the project:			
a) Conflict with adopted energy conservation plans?	☐	☐	☒
b) Result in the need for new or substantially altered power or natural gas utility systems?	☐	☐	☒
c) Create any significant effects on local or regional energy supplies and on requirements for additional energy?	☐	☐	☒
d) Create any significant effects on peak and base period demands for electricity and other forms of energy?	☐	☐	☒
e) Comply with existing energy standards?	☐	☐	☒

SIGNIFICANCE CRITERIA

The impacts to energy and mineral resources would be considered significant if any of the following criteria are met:

- The project conflicts with adopted energy conservation plans or standards.
- The project results in substantial depletion of existing energy resource supplies.
- An increase in demand for utilities impacts the current capacities of the electric and natural gas utilities.
- The project uses non-renewable resources in a wasteful and/or inefficient manner.

DISCUSSION

VI. a), e): Lowering VOC content limits of affected architectural facilities will not conflict with adopted energy conservation plans or cause affected facilities to be out of compliance with existing energy standards because coating contractors are expected to continue current coating operations using the same or similar coating equipment, but using new formulations of coatings affected by PAR 1113. Because add-on control equipment is not expected to be used to comply with the provisions of PAR 1113, no additional energy use is expected to be required. Additionally, PAR 1113 will not substantially increase the number of businesses or amount of equipment in the district and, therefore, would not be expected to interfere with existing energy standards or future energy conservation plans because these are typically targeted to residential consumers, etc.

VI. b), c), d): The architectural coating operations are not expected to change as a result of lowering the VOC content limit of affected coatings. Since there will be no additional demand for electricity, there will be no need for new or substantially altered power or natural gas utility systems as a result of the proposed project. The proposed project will have a non-significant effect on the electricity capacity or demand and, therefore, no significant impact on peak or base demands for electricity.

Based on the above consideration, significant adverse impacts to energy are not expected from PAR 1113. Since there are no significant adverse impacts, no mitigation measures are required and this environmental topic will not be further analyzed in the draft EA.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS. Would the project:			
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	☐	☐	☒
<ul style="list-style-type: none"> Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? 	☐	☐	☒
<ul style="list-style-type: none"> Strong seismic ground shaking? 	☐	☐	☒

• Seismic-related ground failure, including liquefaction?	☐	☐	☒
• Landslides?	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒
c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☒

SIGNIFICANCE CRITERIA

Impacts on the geological environment would be considered significant if any of the following criteria apply:

- Topographic alterations would result in significant changes, disruptions, displacement, excavation, and compaction or over covering of large amounts of soil.
- Unique geological resources (paleontological resources or unique outcrops) are present that could be disturbed by the construction of the proposed project.
- Exposure of people or structures to major geologic hazards such as earthquake surface rupture, ground shaking, liquefaction or landslides.
- Secondary seismic effects could occur which could damage facility structures, e.g., liquefaction.
- Other geological hazards exist which could adversely affect the facility, e.g., landslides, mudslides.

DISCUSSION

VII. a): Architectural coatings are applied to new and existing buildings, stationary structures, roads, etc. The proposed amendments affect coating formulators, sellers, and users and have no effects on geophysical formations in the district because the proposed project does not require or induce the construction of any structures. Coating activities and operations are not expected to change from current practice so the proposed amendments to Rule 1113 will not expose people to potential substantial adverse geological effects greater than what they are exposed to already. Lowering the VOC content limit of affected coating categories will not result in exposing people or structures to risks of loss, injury, or death involving: rupture of an earthquake fault, seismic ground shaking, ground failure or landslides.

VII. b): The proposed project will not require major construction activities (e.g., grading, trenching, refilling and repaving), so there are no potential impacts to existing geophysical conditions. No soil is expected to be disrupted because no new development will be required as a result of the proposed project. Therefore, no substantial soil erosion or loss of topsoil is expected from lowering the VOC content limit of affected coating categories.

VII. c), d): The proposed project does not involve construction of new structures and, therefore, will not involve locating any structures on soil that is unstable or expansive. For this reason, no destabilization of unstable soils would be expected that could cause on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse.

VII. e): The proposed project does not involve the installation of septic tanks or alternative waste water disposal systems. Therefore, this type of soil impact will not occur.

Based on the above considerations, significant adverse impacts to geology and soils are not expected from PAR 1113. Since there are no significant adverse impacts, no mitigation measures are required and this environmental topic will not be further analyzed in the draft EA.

Potentially Significant Impact	Less Than Significant Impact	No Impact
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VIII. HAZARDS AND HAZARDOUS

MATERIALS. Would the project:

- | | | | |
|--|--------------------------|--------------------------|-------------------------------------|
| a) Create a significant hazard to the public or the environment through the routine transport, use, disposal of hazardous materials? | ☐ | ☐ | ☒ |
|--|--------------------------|--------------------------|-------------------------------------|

- | | | | | |
|----|---|--------------------------|--------------------------|-------------------------------------|
| b) | Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | ☐ | ☐ | ☒ |
| c) | Emit hazardous emissions, or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | ☐ | ☐ | ☒ |
| d) | Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would create a significant hazard to the public or the environment? | ☐ | ☐ | ☒ |
| e) | For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? | ☐ | ☐ | ☒ |
| f) | For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? | ☐ | ☐ | ☒ |
| g) | Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | ☐ | ☐ | ☒ |
| h) | Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? | ☐ | ☐ | ☒ |
| i) | Significantly increased fire hazard in areas with flammable materials? | ☐ | ☐ | ☒ |

SIGNIFICANCE CRITERIA

The impacts associated with hazards would be considered significant if any of the following occur:

- Non-compliance with any applicable design code or regulation.
- Non-conformance to National Fire Protection Association standards.
- Non-conformance to regulations or generally accepted industry practices related to operating policy and procedures concerning the design, construction, security, leak detection, spill containment or fire protection.
- Exposure to hazardous chemicals in concentrations equal to or greater than the Emergency Response Planning Guideline (ERPG) 2 levels.

DISCUSSION

VIII. a): Architectural coating operations are not expected to change from current practice and, thus, the amount of solvents used or transported is not expected to change. As the production and use of architectural coatings is not expected to change as a result of implementing PAR 1113, no additional transport of the solvents is expected and, thus, no new hazards to the public will be created through transport, use or disposal of hazardous materials. Consequently, the proposed amendments to Rule 1113 will not create a significant new hazard to the public or create a reasonably foreseeable upset involving the release of hazardous materials.

VIII. b), c): Hazard impact concerns are related to the risk of fire, explosions, or the release of hazardous substances in the event of an accident or upset conditions. It is expected that the lower VOC content limits required by PAR 1113 may be achieved, in part, through the use of replacement solvents and predominantly water-borne technologies. Overall, exempt solvents are considered to be viable alternatives to other, more toxic solvents currently found in various coatings. However, as noted in Table 2-4 in the "Air Quality" section, the typical solvents found in the affected coatings at the current VOC content limits are the same or similar to the solvents found in the same coatings reformulated to the lower-VOC content limit. In order to comply with the lower VOC content limits, the affected coatings are expected to be formulated with less of these similar solvents and more water, which are typically less hazardous than currently used. The coatings reformulated to lower VOC content limits typically are subject to a change in the resin technology making the resin "softer" and, thus, less solvent is needed to break the resin down. As mentioned previously, the solvent list was compiled from MSDS sheets from a variety of coating manufacturers and the MSDS may not list all the solvents used in the formulation but

rather highlight the solvents with potentially hazardous affects. Since the type of solvents are not substantially changing with the reformulation of the affected coatings, the potential adverse hazard impact from exposure to these solvents will either reduce or not change from current conditions.

With regards to the handling and application of any coating, the following safety practices and application techniques are recommended by the National Association of Corrosion Engineers (NACE) and the Society for Protective Coatings. Coating contractors are not expected to require additional training regarding the proper handling or application of compliant coatings containing hazardous materials which will further reduce the applicator's exposure because these safety measures tend to already be in place.

Worker Isolation – Areas where coatings with hazardous materials are applied should be restricted to essential workers. If feasible, these workers should avoid direct contact with hazardous materials by using automated equipment or area with plenty of ventilation.

Protective Clothing and Equipment – When there is potential for hazardous material exposure, workers should be provided with and required to use appropriate personal protective clothing and equipment such as coveralls, footwear, chemical-resistant gloves and goggles, full faceshields, and suitable respiratory equipment.

Respiratory Protection – Only the most protective respirators should be used for situations involving exposures to hazardous materials because they have poor warning properties, are potent sensitizers, or may be carcinogenic. These respirators include:

Any respiratory protection program must, at a minimum, meet the requirements of the OSHA respiratory protection standard [29 CFR 1910.134]. Respirators must be certified by NIOSH and MSHA according to 30 CFR or by NIOSH (effective July 19, 1995) according to 42 CFR 84. A complete respiratory protection program should include: (1) regular training and medical evaluation of personnel, (2) fit testing, (3) periodic environmental monitoring, (4) periodic maintenance, inspection, and cleaning of equipment, (5) proper storage of equipment, and (6) written standard operating procedures governing the selection and use of respirators. The program should be evaluated regularly. The following publications contain additional information about selection, fit testing, use, storage, and cleaning of respiratory equipment: NIOSH Guide to Industrial Respiratory Protection [NIOSH 1987a] and NIOSH Respiratory Design Logic [NIOSH 1987b]. Examples of complying with these regulations include the following:

- Any self-contained breathing apparatus with a full facepiece operated in a pressure-demand or other positive-pressure mode, and

- Any supplied-air respirator with a full facepiece operated in a pressure-demand or other positive-pressure mode in combination with an auxiliary self-contained breathing apparatus operated in a pressure-demand or other positive-pressure mode.

Worker and Employer Education – Worker education is vital to a good occupational safety and health program. OSHA requires that workers be informed about:

- Materials that may contain or be contaminated with hazardous materials;
- The nature of the potential hazard [29 CFR 1910.1200]. Employers must transmit this information through container labeling, material safety data sheets (MSDSs), and worker training;
- The serious health effects that may result from hazardous material exposures; and
- Any materials that may contain or be contaminated with hazardous materials.

Additionally, workers should take the following steps to protect themselves from hazardous material exposure:

- Be aware that the highest hazardous material concentrations may occur inside containment structures.
- Wash hands and face before eating, drinking, or smoking outside the work area.
- Participate in medical monitoring and examination programs, air monitoring programs, or training programs, offered by your employer.

VIII. d): Government code §65962.5 refers to hazardous waste handling practices at facilities subject to the Resources Conservation and Recovery Act (RCRA). Since the proposed project primarily affects the VOC content limit of specific coatings used by coating contractors, hazardous waste handling practices, if any, at regulated facilities would not be affected. However, it is expected that any facility using affected coatings that are on the §65962.5 list will continue to comply with any applicable requirements.

VIII. e), f): Even for facilities that may be located near airports or private airstrips, the proposed project will not create new safety hazards because any affected coating operations are not expected to change their current operating practices.

VIII. g): Reducing the VOC content of affected coatings is not expected to affect or interfere with a user's ability to comply with all adopted emergency response plans and emergency evacuation plans because the proposed project does not involve construction of any structures or features that could impede the execution of emergency response or emergency evacuation plans.

In addition, Health and Safety Code §25506 specifically requires all businesses handling hazardous materials to submit a business emergency response plan to assist local administering agencies in the emergency release or threatened release of a hazardous material. Business emergency response plans generally require the following:

1. Identification of individuals who are responsible for various actions, including reporting, assisting emergency response personnel and establishing an emergency response team;
2. Procedures to notify the administering agency, the appropriate local emergency rescue personnel, and the California Office of Emergency Services;
3. Procedures to mitigate a release, or threatened release to minimize any potential harm or damage to persons, property or the environment;
4. Procedures to notify the necessary persons who can respond to an emergency within the facility;
5. Details of evacuation plans and procedures;
6. Descriptions of the emergency equipment available in the facility;
7. Identification of local emergency medical assistance; and
8. Training (initial and refresher) programs for employees in:
 - a. The safe handling of hazardous materials used by the business;
 - b. Methods of working with the local public emergency response agencies;
 - c. The use of emergency response resources under control of the handler; and
 - d. Other procedures and resources that will increase public safety and prevent or mitigate a release of hazardous materials.

In general, every county or city and all facilities using a minimum amount of hazardous materials are required to formulate detailed contingency plans to eliminate, or at least minimize, the possibility and effect of fires, explosion, or spills. In conjunction with the California Office of Emergency Services, local jurisdictions have enacted ordinances that set standards for area and business emergency response plans. These requirements include immediate notification, mitigation of an actual or threatened release of a hazardous material, and evacuation of the emergency area. Based on the preceding information, it is not anticipated that PAR 1113 would impair implementation of or physically interfere with an adopted or modified emergency response plan or emergency evacuation plan.

VIII. h): Architectural coatings are used predominantly in urbanized areas. For this reason and the fact that PAR 1113 affects a limited number of architectural coating

categories, the proposed project is not expected to increase the probability of wildfires in urbanized or wilderness areas.

VIII. i): PAR 1113 is expected to reduce the VOC content limits for specified coating categories primarily through reformulation of the solvent or conversion to alternative resin technologies. It is anticipated that the reformulation will primarily entail the use of water-based components or low-VOC materials less hazardous or flammable than currently being used. Refer to the discussion in VIII b) and c) for the comparison of solvents currently used in the affected coatings versus the solvents used to reformulate the same coatings to a lower VOC content limit.

The proposed amendments will also specifically consider TBAC as a non-VOC on a limited basis. TBAC has low photochemical reactivity, but physical and chemical properties are generally similar to the conventional solvents currently used in IM coatings as noted in Table 2-5. The Uniform Fire Code and Uniform Building Code set standards intended to minimize risks from flammable or otherwise hazardous materials. Local jurisdictions are required to adopt the uniform codes or comparable regulations. Local fire agencies require permits for the use or storage of hazardous materials and permit modifications for proposed increases in their use. Permit conditions depend on the type and quantity of the hazardous materials at the facility. Permit conditions may include, but are not limited to, specifications for sprinkler systems, electrical systems, ventilation, and containment. The fire departments make annual business inspections to ensure compliance with permit conditions and other appropriate regulations. Consequently, local fire departments ensure that adequate permit conditions are in place to protect against potential risk of upset from the use of hazardous materials. However, any use of hazardous materials at affected facilities is not expected to change and may even decrease as a result of implementing the proposed project.

TABLE 2-5
Chemical Characteristics for Typical IM Coating Solvents

<i>Traditional/Conventional Solvents</i>						
Chemical Compounds	M.W.	Boiling Point (°F)	Flashpoint^a (°F)	Vapor Pressure (mmHg @ 68 °F)	Lower Explosive Limit (% by Vol.)	Flammability Classification (NFPA)*
Toluene	92	231	40	22	1.3	3
Xylene	106	292	90	7	1.1	3
MEK	72	175	21	70	2.0	3
Isopropanol	60	180	53	33	2.0	3
Butyl Acetate	116	260	72	10	1.7	3
Isobutyl Alcohol	74	226	82	9	1.2	3
Stoddard Solvent	144	302 - 324	140	2	0.8	2

TABLE 2-5 (CONCLUDED)

Chemical Characteristics for Typical IM Coating Solvents

<i>Traditional/Conventional Solvents</i>						
Chemical Compounds	M.W.	Boiling Point (°F)	Flashpoint^a (°F)	Vapor Pressure (mmHg @ 68 °F)	Lower Explosive Limit (% by Vol.)	Flammability Classification (NFPA)*
Petroleum Distillates (Naptha)	100	314 - 387	105	40	1.0	4
EGBE	118	340	141	0.6	1.1	2
EGME	76	256	107	6	2.5	2
EGEE	90	275	120	4	1.8	2
<i>Replacement Solvents</i>						
Chemical Compounds	M.W.	Boiling Point (°F)	Flashpoint^a (°F)	Vapor Pressure (mmHg @ 68 °F)	Lower Explosive Limit (% by Vol.)	Flammability Classification (NFPA)*
Acetone	58	133	1.4	180	2.6	3
Di-Propylene Glycol	134	451	279	30	1	1
Propylene Glycol	76	370	210	0.1	2.6	1
Ethylene Glycol	227	388	232	0.06	3.2	1
texanol	216	471	248	0.1	0.62	1
Oxsol 100	181	282	109	5	0.90	1
t-Butyl Acetate	113	208	59	34	1.5	3

*National Fire Protection Association

0 = minimal; 1 = slight; 2 = moderate; 3 = serious; 4 = severe

Thus, the use of TBAC as a replacement solvent for IM coatings and zinc-rich maintenance primers will not result in adverse hazard impacts as the conditions which lead to a potentially hazardous situation is not expected to substantially change from current conditions.

Based on the above considerations, significant adverse impacts to hazards and hazardous materials are not expected from PAR 1113. Since there are no significant adverse impacts, no mitigation measures are required and this environmental topic will not be further analyzed in the draft EA.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY.			
Would the project:			
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?	☐	☐	☒
d) Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	☐	☐	☒
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒
f) Otherwise substantially degrade water quality?	☐	☐	☒
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard	☐	☐	☒

	Boundary or Flood Insurance Rate Map or other flood hazard delineation map?			
h)	Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☒
i)	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☒
j)	Inundation by seiche, tsunami, or mudflow?	☐	☐	☒
k)	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒
l)	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒
m)	Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒
n)	Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒
o)	Require in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒

SIGNIFICANCE CRITERIA

Potential impacts on water resources would be considered significant if any of the following criteria apply:

Water Quality:

- The project will cause degradation or depletion of ground water resources substantially affecting current or future uses.
- The project will cause the degradation of surface water substantially affecting current or future uses.
- The project would result in a violation of National Pollutant Discharge Elimination System (NPDES) permit requirements.
- The capacities of existing or proposed wastewater treatment facilities and the sanitary sewer system are not sufficient to meet the needs of the project.
- The project results in substantial increases in the area of impervious surfaces, such that interference with groundwater recharge efforts occurs.
- The project results in alterations to the course or flow of floodwaters.

Water Demand:

- The existing water supply does not have the capacity to meet the increased demands of the project, or the project would use a substantial amount of potable water.
- The project increases demand for water by more than five million gallons per day.

DISCUSSION

IX. a), f): Lowering the VOC content limit of coatings at affected facilities will have no direct or indirect impact on hydrology and water quality because the reformulation of the coatings is not expected to change the current architectural coating operation practices or alter the coating formulations to be more detrimental to water quality. It is likely that resin manufacturers and coating formulators will replace conventional coating formulations and, as noted in Table 2-4, may contain similar solvents. Also, due to the change in resin technology to formulate coatings with lower VOC content, the need for stronger solvents to break down the newer “softer” resin is reduced.

In the past the SCAQMD has received comments that with the increased use of water-borne technologies to meet the lower VOC content limits, there will be a greater trend of coating applicators to improperly dispose of the waste generated from these coatings into the ground, storm drains, or sewer systems. However, there are no data to support this contention. In any event, there are several reasons why there should be no significant increase over current practices for improper disposal due to greater use of water-borne coatings.

Results from a survey of contractors determined that a majority either dispose of the waste material properly as required by the coating manufacturer's MSDS or recycle the waste material regardless of type of coating. Based upon these results, there is no reason to expect that paint contractors will change their disposal practices, especially those that dispose of wastes properly, with the implementation of PAR 1113. There is also no reason to expect that illegal disposal practices will increase as a result of implementing PAR 1113.

State and federal regulations promote the development and use of coatings formulated with non-hazardous solvents. Based on discussions with resin manufacturers and coating formulators, the trend in coating technologies is to replace toxic/hazardous solvents with equal or less toxic/hazardous solvents. Therefore, wastewater which may be generated from reformulated coatings is expected to contain less hazardous materials than the wastewater generated for solvent-based coating operations, thereby reducing toxic influent to the POTWs.

Consumer and user outreach and education programs such as NPCA's "Protocol for Management of Post Consumer Paint," and the SCAQMD's "Painter's Guide to Clean Air" provide the public and painting contractors with information on environmentally sound coating disposal practices. These public outreach programs are expected to reduce the amount of coating waste material entering the sewer systems, storm drainage systems, and being dumped on the ground, therefore, further reducing any water quality impacts associated with the improper disposal of compliant coatings.

The EPA in its Report to Congress entitled "Study of Volatile Organic Compound Emissions from Consumer and Commercial Products" evaluated consumer products to determine which categories were likely to be disposed of to POTWs. The study found that the likelihood of paints, primers, and varnishes being disposed of to POTWs was low. Therefore, this category was not even evaluated for its VOC emission impacts on POTWs. This suggests that the presence of solvents from this category of consumer products in wastewater streams is very low compared to the total volume of solvents being disposed of from other consumer product categories.

To evaluate potential water quality impacts from PAR 1113, it is assumed that future compliant AIM coatings will be formulated primarily with water-borne technologies. As a result, more water will be used for clean-up and the resultant wastewater material could be disposed of into the public sewer system. It is anticipated that current coating

equipment (i.e., spray guns, rollers, and brushes) clean-up practices of using water will continue into the future. Table 2-6 illustrates the “worst-case” potential increase of waste material likely to be received by POTWs in the district as a result of implementing PAR 1113. POTW’s average daily flow is based on historical wastewater flow in the district. Further, the estimated usage is based on the assumption that 45 percent of the state sales (from Table 2-2) are within the SCAQMD jurisdiction.

TABLE 2-6**Projected POTW Impact From Implementing PAR 1113**

Year	POTW Average Daily Flow^a (mgd)	POTW Capacity^b (mgd)	Estimated Usage (gallons/year)	Coatings Disposal Daily Flow^c (mgd)	Total Impacts (% Increase)
2006	1394.00	1687.30	3,016,962	0.0083	0.00048

^a 2002 data of total average daily wastewater flows handled by all POTWs greater than 10 mgd in the district (2003 AQMP).

^b Based on design daily flows by all POTWs greater than 10 mgd in the district (2003 AQMP).

^c Assumes that one gallon of water will be used to clean-up equipment for every gallon of coating applied. The figures for Coatings Disposal Flow are based on the annual emissions inventory of the affected coating categories in 2006; originally expressed in mgy, they are converted to mgd by dividing by 365.

mgd = millions of gallons per day

The potential increase estimated as a result of implementing PAR 1113 is considered to be well within the projected capacity of POTWs in the district based on historical wastewater data. Hence, wastewater impacts associated with the disposal of water-borne clean-up waste material generated from PAR 1113 affected coating categories are not considered significant. With the increasing trend toward less toxic water-borne coatings, it is likely that there will be less severe impacts to water quality because of improvements in affluent water quality. Therefore, PAR 1113 will not significantly adversely affect water resources, water quality standards, groundwater supplies, existing water supplies or wastewater treatment facilities.

IX. b), n): Historically, potential water demand to reformulate conventional coatings into waterbased coatings and to clean up waterbased coatings has not resulted in a significant adverse impact on water demand or depleted groundwater supplies. Using “worst-case” assumptions, increased water demand from implementing PAR 1113 can be calculated for both manufacturer of water-based coatings and water used to clean coating equipment. As shown in Table 2-7, water demand associated with the manufacture and clean-up of water-borne formulations is estimated to be 16,548 gallons per day (6.04 million gallons per year). This increased water demand does not exceed the SCAQMD’s significant threshold of 5,000,000 gallons per day and, therefore, is not considered to be a significant water demand impact.

While it is not possible to predict water shortages in the future, existing entitlements and resources in the district provide sufficient water supplies that currently exceed demand. Further, according to the Metropolitan Water District (MWD), the largest supplier of water to California, “For its part, Metropolitan expects to be able to meet 100 percent of its member agencies’ water needs for the next ten years, even during times of critical drought. Metropolitan and its member agencies have identified and are implementing programs and projects to assure continued reliable water supplies for at least the next 20 years.”⁵ MWD is expected to continue providing a reliable water supply through developing a portfolio of diversified water sources that includes: cooperative conservation; water recycling; and groundwater storage, recovery, and replenishment programs. Other additional water supplies will be supplied in the future as a result of water transfer from other water agencies, desalination projects and state and federal water initiatives, such as CALFED and California’s Colorado River Water Use Plan.

TABLE 2-7**Projected Water Demand from Implementing PAR 1113**

Year	Projected Population^a (millions of people)	Projected Water Demand^b (bgg)	Projected Coating Sales^c (mgg)	Projected Mfgr Demand^d (mgg)	Projected Cleanup Demand^e (mgg)	PAR 1113 Total Demand^f (mgg)	Total Impacts^g (% Increase)
2006	17.04	1,414.84	3.02	3.02	3.02	6.04	0.0004

^a Population projections obtained from SCAG’s 1998 RTP.

^b Water demand and supply projections obtained from Hydrology Existing Setting in 2003 AQMP. AF (acre-feet) equals approximately 326,000 gallons

^c Obtained from Table 2-2 in this Initial Study.

^d Assumes that one gallon of water will be used to manufacture one gallon of coating applied. Also assumes as a “worst-case” scenario, that all affected coatings used in the SCAQMD’s jurisdiction were manufactured here.

^e Assumes that one gallon of water will be used to clean-up equipment for every gallon of coating applied. Also assumes as a “worst-case” scenario, that full conversion of affected coating categories to water-borne formulations occurs in 2006.

^f Total amount of manufacturer and clean-up water demand.

^g The percentage increase in water demand as a result of the incremental increase due to water clean-up of water-borne coating material.

Acronyms: bgg = billion gallons per year; mgg = millions of gallons per year

As shown in Table 2-7, it is within the capacity of the local water suppliers to supply the small incremental increase in water demand associated with the implementation of PAR 1113. Sufficient water supplies are available to serve the project from existing entitlements and no new or expanded entitlements are needed to implement the proposed project. Therefore, no significant water demand impacts are expected as the result of implementing PAR 1113.

⁵ From Metropolitan Water District, Annual Progress Report to the California’s State Legislature, February 2002.

- IX. c), d), e): The proposed project would not change current architectural coating application or practices. Consequently, no major construction activities will be necessary to comply with PAR 1113, so the proposed project will not require site preparation, so the proposed project is not expected to alter any existing drainage patterns, increase the rate or amount of surface runoff water that would exceed the capacity of existing or planned stormwater drainage systems.
- IX. g), h): Since PAR 1113 does not require construction of new structures, it will not result in placing housing in a 100-year flood hazard areas. Architectural coating contractors are not expected to change their existing coating practices, so any flood hazards would be part of the existing setting or would be present for reasons unrelated to PAR 1113.
- IX. i), j): Since PAR 1113 does not require construction of new facilities, it will not alter existing flood risks or risks from seiches, tsunami's or mudflow conditions.
- IX. k): Since the proposed project is not expected to generate significant adverse water quality impacts industry-wide, no changes to existing wastewater treatment permits at affected coating manufacturing facilities are expected to be necessary. As a result, it is expected that operators of affected facilities would continue to comply with existing wastewater treatment requirements of the applicable Regional Water Quality Control Boards or sanitation districts.
- IX. l), m), o): As indicated in the discussion under items IX a) and f), the proposed project is not expected to result in a significant increase in the volume of wastewater generated in the district. Similarly, as discussed under items IX b) and n), the proposed project is not expected to significantly increase demand for water in the district. As a result, it is not anticipated that PAR 1113 would generate additional volumes of wastewater that could exceed the capacity of existing stormwater drainage systems or require the construction of new wastewater or stormwater drainage facilities.

Based on the above considerations, significant adverse impacts to hydrology and water quality are not expected to occur from implementing PAR 1113. Since there are no significant adverse impacts, no mitigation measures are required and this environmental topic will not be further analyzed in the draft EA.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
X. LAND USE AND PLANNING. Would the project:			
a) Physically divide an established community?	☐	☐	☒
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒
c) Conflict with any applicable habitat conservation or natural community conservation plan?	☐	☐	☒

SIGNIFICANCE CRITERIA

- Land use and planning impacts will be considered significant if the project conflicts with the land use and zoning designations established by local jurisdictions.

DISCUSSION

X. a.): Lowering the VOC content limit of certain coatings manufactured by affected facilities will not create divisions in any existing communities because there is no anticipated change to current architectural coating practices. Further, the proposed project does not require construction of any features, such as freeways, that would physically divide an established community.

X. b), c): Architectural coating operations would still be expected to comply, and not interfere, with any applicable land use plans, zoning ordinances, habitat conservation or natural community conservation plans. There are no provisions of the proposed project that would directly affect these plans, policies, or regulations. Land use and other planning considerations are determined by local governments and no present or planned land uses in the region or planning requirements will be altered by the proposed project. No new development or alterations to existing land use designations will occur as a result of the implementation of the proposed amendments. It is not

anticipated that architectural coating operations located in the district would require additional land to continue current operations or require rezoning as a result of implementing PAR 1113. Therefore, no significant adverse impacts affecting existing or future land uses are expected.

Based on the above consideration, significant adverse impacts to land use and planning are not expected from PAR 1113. Since there are no significant adverse impacts, no mitigation measures are required and this environmental topic will not be further analyzed in the draft EA.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
XI. MINERAL RESOURCES. Would the project:			
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☒

SIGNIFICANCE CRITERIA

Project-related impacts on mineral resources would be considered significant if any of the following conditions are met:

- The project would result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.
- The proposed project results in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

DISCUSSION

XI. a), b): There are no provisions of the proposed amended rule that would directly result in the loss of availability of a known mineral resource, such as aggregate, coal, shale, etc., of value to the region and the residents of the state, or of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. The proposed project would lower the VOC content of certain coatings, which typically do not require mineral resources to reformulate compliant products.

Based on the above consideration, significant adverse impacts to mineral resources are not expected from PAR 1113. Since there are no significant adverse impacts, no mitigation measures are required and this environmental topic will not be further analyzed in the draft EA.

		Potentially Significant Impact	Less Than Significant Impact	No Impact
XII. NOISE. Would the project result in:				
a)	Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒
b)	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒
c)	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒
d)	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport	☐	☐	☒

or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

- f) For a project within the vicinity of a private airship, would the project expose people residing or working in the project area to excessive noise levels? ☐ ☐ ☒

SIGNIFICANCE CRITERIA

Impacts on noise would be considered significant if:

- Construction noise levels exceed local noise ordinances or, if the noise threshold is currently exceeded, project noise sources increase ambient noise levels by more than three decibels (dBA) at the site boundary. Construction noise levels will be considered significant if they exceed federal Occupational Safety and Health Administration (OSHA) noise standards for workers.
- The proposed project operational noise levels exceed any of the local noise ordinances at the site boundary or, if the noise threshold is currently exceeded, project noise sources increase ambient noise levels by more than three dBA at the site boundary.

DISCUSSION

XII. a), b), c), d): Excessive generation of noise, excessive groundborne vibration, or substantial increase in ambient noise levels is generally not associated with architectural coating operations. The proposed project is not expected to increase noise levels relative to existing noise levels that are currently generated from the application and use of architectural coatings. Even though architectural coating operations are not noise intensive, it is expected that painting contractors would comply with existing relevant local community noise standards and ordinances. It is likely that noise generated by coating contractors' operations would be indistinguishable from noise sources generated from adjacent sources which may include nearby freeways, truck traffic to adjacent businesses, and operational noise from adjacent businesses. In general, the primary noise source at existing facilities that manufacture architectural coatings is generated by vehicular traffic, such as trucks transporting raw materials to the facility, trucks hauling wastes away from the facility, trucks to recycle waste or other materials, and miscellaneous noise such as spray equipment (i.e. compressors, spray nozzles) and heavy equipment use (forklifts, trucks, etc.). Noise would typically be generated during operating hours, which generally

range from 6 a.m. to 5 p.m. Monday through Friday. PAR 1113 is not expected to alter noise from existing noise generating sources. It is likely that coating contractors or affected facilities manufacturing architectural coatings are operating in compliance with any local noise regulations that may exist in their respective communities. Additionally, the implementation of PAR 1113 is not expected to result in significant noise impacts in residential areas because changing the VOC content will not affect noise levels from coating applications, since it is expected that coating contractors would use the same or similar equipment. Contractors or do-it-yourselfers applying compliant PAR 1113 coatings in residential areas are expected to comply with local community noise standards. Thus, lowering of VOC content limit requirement of affected coating categories would have no additional noise impacts.

XII. e), f): Lowering the VOC content of coatings affected by PAR 1113 is not expected to alter in any way coating contractor operations. As a result, noise levels from coating equipment is not expected to change as a result of the proposed project and, therefore, will not create significant adverse noise impacts even if coating operations occur near an airport or private airstrip.

Based on the above considerations, significant adverse impacts to noise are not expected from PAR 1113. Since there are no significant adverse impacts, no mitigation measures are required and this environmental topic will not be further analyzed in the draft EA.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
XIII. POPULATION AND HOUSING. Would the project:			
a) Induce substantial growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (e.g. through extension of roads or other infrastructure)?	☐	☐	☒
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☒

SIGNIFICANCE CRITERIA

The impacts of the proposed project on population and housing would be considered significant if the following criteria are exceeded:

- The demand for temporary or permanent housing exceeds the existing supply.
- The proposed project produces additional population, housing or employment inconsistent with adopted plans either in terms of overall amount or location.

DISCUSSION

XIII. a), b), c): Human population in the SCAQMD's jurisdiction is anticipated to grow regardless of implementing the proposed project. The proposed amendments will primarily affect the formulation of architectural coatings and are not anticipated to generate any significant effects, either direct or indirect on the district's population as no additional workers are anticipated to be required to comply with the proposed amendments. Further, PAR 1113 is not expected to cause a relocation of population within the district. As a result, housing in the district is expected to be unaffected by the proposed amendments. The population will not grow directly as a result of the proposed amended rule and the coating activity will not indirectly induce growth in the area of the coating facilities. The construction of single- or multiple-family housing units would not be required as a result of implementing the proposed project. Therefore, existing housing or populations in the district are not anticipated to be displaced necessitating the construction of replacement housing elsewhere.

Based on the above considerations, significant adverse impacts to population and housing are not expected from PAR 1113. Since there are no significant adverse impacts, no mitigation measures are required and this environmental topic will not be further analyzed in the draft EA.

Potentially Significant Impact	Less Than Significant Impact	No Impact
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XIV. PUBLIC SERVICES. Would the proposal result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered government facilities, the construction of

which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:

a) Fire protection?	☐	☐	☒
b) Police protection?	☐	☐	☒
c) Schools?	☐	☐	☒
d) Parks?	☐	☐	☒
e) Other public facilities?	☐	☐	☒

SIGNIFICANCE CRITERIA

- Impacts on public services would be considered significant if the project results in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response time or other performance objectives.

DISCUSSION

XIV. a), b): The proposed amendments will not substantially increase the amount of businesses or equipment in the district. Reformulation of coatings is not expected to require new or additional fire fighting resources or police protection. In fact, PAR 1113 may actually result in fewer impacts to public service agencies because compliant coatings are generally expected to be formulated with less hazardous materials compared to current conventional coatings. Any increase in accidental releases of compliant coating materials would be expected to result in a concurrent reduction in the number of accidental releases of existing conventional coating materials. As a result, the net number of accidental releases would be expected to remain constant, allowing for population growth in the district. Additionally, future compliant coating materials are not expected to cause significant adverse human health impacts, so accidental release scenarios would be expected to pose a lower risk to the public and less need for emergency responders such as fire and police departments. Furthermore, if manufactures continue to use solvents such as texanol, propylene glycol, ethylene glycol, etc., in their compliant water-borne coatings, fire departments would not be expected to experience adverse impacts because in general these solvents are equal or less flammable solvents than currently used solvents and, therefore, create fewer emergency incidents. Additional demands on fire or police department services are not expected to increase, so impacts to these services are, therefore, not considered to be significant. Any potential increase in the use of flammable substances, such as

TBAc or acetone, would be offset by a reduction in the use of flammable solvents such as toluene or xylene. As a result, fire or police department performance objectives, service ratios, response times, etc., are not expected to be significantly adversely affected.

XIV. c), d): Because coating operations are not expected to change, coating contractor operations are not expected to require new employees. As noted in item "XIII. Population and Housing," the proposed project will not increase population growth in the district. Consequently, no new impacts to schools, parks or other recreational facilities are foreseen as a result of implementing the proposed amendments to Rule 1113.

XIV. e): Lowering the VOC content of a few selected architectural coatings is not anticipated to result in the need for new or physically altered government facilities in order to maintain acceptable service ratios, response times or other performance objectives because use of reformulated coatings would simply displace use of conventional coatings.

Based on the above considerations, significant adverse impacts to public services are not expected from PAR 1113. Since there are no significant adverse impacts, no mitigation measures are required and this environmental topic will not be further analyzed in the draft EA.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
XV. RECREATION.			
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.?	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☒

SIGNIFICANCE CRITERIA

The impacts to recreation would be considered significant if:

- The project results in an increased demand for neighborhood or regional parks or other recreational facilities.
- The project adversely affects existing recreational opportunities.

DISCUSSION

XV. a), b): The proposed amendments will not generate additional demand for, or otherwise affect land used for recreational purposes. The proposed amendments are not expected to have adverse affects on land uses in general. As discussed under “Land Use and Planning” above, there are no provisions in the proposed project that would affect land use plans, policies or ordinances, or regulations. Land use and other planning considerations are determined by local governments; no land use or planning requirements will be altered by the proposal. As already noted in item “XIII, Population and Housing”, the proposed project is not expected to increase population growth in the district because use of low VOC coatings does not require additional employees. As a result, no additional demand for parks is anticipated. Further, the proposed amendments would not increase the use of existing neighborhood and regional parks or other recreational facilities or include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.

Based on the above considerations, significant adverse impacts to recreation are not expected from PAR 1113. Since there are no significant adverse impacts, no mitigation measures are required and this environmental topic will not be further analyzed in the draft EA.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
XVI. SOLID/HAZARDOUS WASTE. Would the project:			
a) Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?	☐	☐	☒
b) Comply with federal, state, and local statutes	☐	☐	☒

and regulations related to solid and hazardous waste?

SIGNIFICANCE CRITERIA

The proposed project impacts on solid/hazardous waste would be considered significant if the following occur:

- The generation and disposal of hazardous and non-hazardous waste exceeds the capacity of designated landfills.

DISCUSSION

XVI. a), b): Coating operations are not expected to change as a result of the proposed amendments. Similarly, the volume of coatings and coating wastes is not expected to increase as a result of implementing PAR 1113. Therefore, no new solid or hazardous waste will be generated as a result of lowering the VOC content limit of certain coatings in Rule 1113. Affected facilities would continue to complying with federal, state, and local statutes and regulations related to solid and hazardous waste handling and disposal. Therefore, potential solid waste impacts are considered not significant.

Based on the above consideration, significant adverse impacts to solid/hazardous waste are not expected from PAR 1113. Since there are no significant adverse impacts, no mitigation measures are required and this environmental topic will not be further analyzed in the draft EA.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION/TRAFFIC. Would the project:			
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	☐	☐	☒

b)	Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	☐	☐	☒
c)	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☒
d)	Substantially increase hazards due to a design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	☐	☐	☒
e)	Result in inadequate emergency access or?	☐	☐	☒
f)	Result in inadequate parking capacity?	☐	☐	☒
g)	Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g. bus turnouts, bicycle racks)?	☐	☐	☒

SIGNIFICANCE CRITERIA

The impacts on transportation/traffic would be considered significant if any of the following criteria apply:

- Peak period levels on major arterials are disrupted to a point where level of service (LOS) is reduced to D, E or F for more than one month.
- An intersection's volume to capacity ratio increase by 0.02 (two percent) or more when the LOS is already D, E or F.
- A major roadway is closed to all through traffic, and no alternate route is available.
- There is an increase in traffic (e.g., 350 heavy-duty truck round-trips per day) that is substantial in relation to the existing traffic load and capacity of the street system.
- The demand for parking facilities is substantially increased.

- Water borne, rail car or air traffic is substantially altered.
- Traffic hazards to motor vehicles, bicyclists or pedestrians are substantially increased.

DISCUSSION

XVII. a), b), f): PAR 1113 is not expected to alter affected coating contractor operations so no additional transportation/circulation impacts are expected to occur directly or indirectly as a result of lowering the VOC content limit of certain coatings in Rule 1113. As noted in item XIII, Population and Housing, no new employees are expected to be needed for architectural coating operations and therefore no new worker trips that could increase traffic or affect in any way the level of service designation for any roadways will result from the proposed amendments. Similarly, additional parking would not be required from implementing PAR 1113. Because affected coating operations are not expected to change, no new or additional raw materials will be needed and, therefore, no additional transport trips that could affect the level of service for roadways will be generated from the continued operation of the coating activity.

XVII. c): Air traffic patterns are not expected to be directly or indirectly affected by the proposed amended rule because the coating activity will not require any air transportation of any materials. Since PAR 1113 will not require transport of materials by air, no increase in any safety risks are expected.

XVII. d), e): The proposed amendments to Rule 1113 are not expected to generate significant not have direct or indirect roadway hazard impacts because the proposed project does not require or induce the construction of roadway design features. PAR 1113 simply lowers the VOC content limit of certain coatings, so it is expected that the architectural coating operations would not change.

XVII. g): Affected facilities would still be expected to comply with, and not interfere with adopted policies, plans, or programs supporting alternative transportation. The lowering of the VOC content limit of certain coatings in Rule 1113 will not hinder compliance with any applicable alternative transportation plans or policies.

Based on the above considerations, significant adverse impacts to transportation/circulation are not expected from PAR 1113. Since there are no significant adverse impacts, no mitigation measures are required and this environmental topic will not be further analyzed in the draft EA.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.			
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)	☒	☐	☐
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐

XVIII. a): As discussed in item III above, the proposed amended rule has the potential to cause significant adverse air quality impacts from the delay in complying with current lowering of the VOC content for certain architectural coatings in Rule 1113. However, the delay is expected to last one year when the original VOC content limits are required to be met. Therefore, the proposed project is not expected to permanently degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal. Similarly, PAR 1113 would not eliminate important examples of the major periods of California history or prehistory or otherwise degrade cultural resources.

XVIII.b) The foregoing analysis indicates that implementing PAR 1113 may generate significant adverse impacts to air quality. This environmental topic will be analyzed in the Draft EA and cumulative impacts will be analyzed where warranted.

XVIII.c) Based on the foregoing analyses, PAR 1113 has the potential to cause significant adverse air quality impacts, which could adversely affect human beings, either directly, or indirectly.

APPENDIX A OF THE NOTICE OF PREPARATION / INITIAL STUDY

PROPOSED AMENDED RULE 1113

In order to avoid confusion, the proposed amended rule included in the NOP/IS package has been excluded. The “PAR 1113 January, 2006” version of the proposed amended rule was circulated with the NOP/IS that was released on January 24, 2006 for a 30-day public review and comment period ending February 22, 2006.

Original hard copies of the NOP/IS, which include the “PAR 1113 January, 2006” version of the proposed amended rule, can be obtained through the SCAQMD Public Information Center at the Diamond Bar headquarters or by calling (909) 396-2039.

