DRAFT ENVIRONMENTAL IMPACT REPORT

PROPOSED AMENDMENTS TO APCD RULE 74.2, ARCHITECTURAL COATINGS

Ventura County Air Pollution Control District

669 County Square Drive
Ventura, California 93003

State Clearinghouse # 2020070158

August 2020

Foreword

The Ventura County Air Pollution Control District (VCAPCD, or District) in compliance with the California Environmental Quality Act (CEQA) of 1970 has prepared this draft environmental impact report (EIR). An EIR is an informational document that must be prepared and considered by public agencies prior to the approval or disapproval of a project that may have a significant impact on the environment. The purpose of this report is to provide public agencies and the public with detailed information about the effect that a proposed project is likely to have on the environment, to list ways that any potentially significant adverse effects of the project might be minimized, and to suggest alternatives to the proposed project.

Ventura County exceeds the state and federal standards for ozone and the state standard for particulate matter. Ground level ozone is a secondary pollutant formed by photochemical reactions between oxides of nitrogen and reactive organic compounds (ROC and synonymous with VOC) in the presence of sunlight. The objective of the proposed amendments to Rule 74.2 is to reduce the amount of ROC emissions being released into the atmosphere, which originate from the organic solvent portion of the coating. On February 14, 2017, the Ventura County Air Pollution Control Board adopted the 2016 Air Quality Management Plan, which contains measures needed to meet the federal ambient air quality standards including Control Measure R-333-2017, Architectural Coatings. The estimated ROC emission reductions from the adoption of proposed amendments to Rule 74.2 are 0.13 tons per day.

In addition, Ventura County is required to meet California Clean Air Act requirements. Air districts that are nonattainment for the state ozone standard, such as Ventura County, are required by the California Health and Safety Code to adopt All Feasible Measures (H&SC 40914) and to develop rules to implement their plans for attaining state ambient air quality standards (H&SC 40920) for the serious non-attainment areas. The state guidelines for the determination of feasible measures require the review of the Suggested Control Measure (SCM) prepared by a state agency like California Air Resource Board (CARB or ARB), which have been considered in the proposed rule amendments. Adoption of the proposed Rule 74.2 amendments would fulfill the District's commitment to its AQMP and responsibility to continue protecting human health and the environment in Ventura County.

The proposed project, which is the subject of this EIR, is a new and improved version of an existing air pollution control regulation (Rule 74.2) designed to reduce ROC emissions from the use of architectural coatings. Since the intent of the amendments to this existing regulation is to improve environmental quality, there is no need to list ways to minimize potentially significant adverse effects.

According to the County of Ventura Administrative Supplement to the State CEQA Guidelines last amended July 13, 2010, (Section 5.4.3, Use of an Environmental Document from an Earlier Project, page 15), an agency may reuse an EIR, previously prepared and certified for one project, for another project if an Initial Study shows that the previous EIR adequately describes the current project's setting, impacts, alternatives, and mitigation measures. According to the Initial Study (Appendix C) for this project, the previous 2009 Final EIR for Proposed Amendments to Rule 74.2, Architectural Coatings, can be reused based on the following:

1. The proposed project, Proposed Amendments to Rule 74.2, Architectural Coatings, is a more stringent version of Rule 74.2, and will further reduce ROC emissions from the use

of architectural coatings and will further improve air quality. Since the air pollution source being regulated is identical to the previous project, and the control measure being implemented is similar, i.e., the requirement to use architectural coatings that are more environmentally friendly, the reuse of the 2009 Final EIR, which is identical in scope and impacts, adequately describes the settings and impacts for the proposed 2020 Proposed Amendments to Rule 74.2.

2. The issues raised by architectural coating manufacturers during the 2009 Final EIR that the rule requirements, which mandated the use of lower ROC content coatings, are counterproductive to air quality, are identical to those currently being raised. These issues were addressed in the 2009 Final EIR and the 2020 Initial Study for this project and in the Environmental Analysis (EA) contained in the 2019 SCM Staff Report.

3. When the South Coast Air Quality Management District (SCAQMD) adopted the 2016 Proposed Amendments to Rule 1113 (a more stringent version of proposed amendments to Rule 74.2), they adopted the corresponding Final Environmental Assessment (State Clearinghouse -SCH No. 2015091040). Because SCAQMD is a certified regulatory agency under CEQA, they have the ability to perform an Environmental Assessment instead of an EIR.

4. The proposed project is based on the 2019 SCM prepared by ARB. This SCM was updated from the previous update in 2007. Both SCMs went through the CEQA process by providing an EA in an effort to facilitate use of the SCM by local air districts such as VCAPCD. It was noted by CARB that their EA serves as a substitute document equivalent to an addendum to the Final Program Environmental Impact Report (PEIR) for the 2000 SCM (State Clearinghouse – SCH No. 99062093) which explains CARB's determination that no additional environmental analysis is required for the proposed SCM in 2007 and 2019. The 2000 PEIR to the architectural coatings SCM concluded that no significant environmental impacts would occur as a result of air districts adopting the state SCMs.

5. This action is allowed under the Ventura County Supplement to State CEQA Guidelines and CEQA Guidelines Section 15153, if the previous EIR adequately describes the current project's setting, impacts, alternatives and mitigation measures and no new significant impacts or mitigation measures are identified, provided an Initial Study is conducted. The 2009 Final EIR took a similar approach to analyses and references from CARB's 2000 SCM PEIR, pursuant to CEQA Guidelines Sections 15150 and 15168. VCAPCD staff concluded that there will be no new significant adverse impacts from any of the aforementioned six potential impacts. Numerous air districts across the state have also determined no significant environmental impacts from lowering ROC limits in architectural coatings and have rightfully elected to claim the CEQA Categorical Exemption of Actions by Regulatory Agencies for the Protection of the Environment (15308), as also noted by CARB in their PEIR. However, VCAPCD chooses to provide an environmental analysis for consistency with the District's past 74.2 rule amendments process.

Prior to the reuse of an EIR, the agency must provide the following:

1. Provide public notice that the previous EIR will be used as a draft EIR.
2. Respond to public comments received in response to the notices, and

3. Complete the remaining steps in the CEQA process.

On July 10, 2020, VCAPCD made available online and at the County Offices a Notice of Preparation of a draft EIR, a Workshop Notice scheduled for July 23, 2020, and made an Initial Study available to all interested parties by posting this document on the VCAPCD website. This notice stated that VCAPCD, as the Lead Agency, is proposing to reuse the September 2009 Final EIR on Proposed Amendments to Rule 74.2, as the draft EIR for this project. No comments on this proposal were received either by mail, email, or at the July 23, 2020, meeting. Also, we received no comments on the Initial Study during the 30-day review period (Appendix C).

Following this page is the 2009 Final EIR with only the appendices changed to add the project description, updated Staff Report, and 2020 Initial Study. In addition, the 2009 Final EIR relied on the reuse of 2001 Final EIR. So, in effect, this EIR also relies on that report, which also follows this page. Because both the 2009 amendments to Rule 74.2 and the proposed Rule 74.2 amendments represent a similar type of rule change, which strengthens proposed ROC content standards for architectural coatings, the environmental impacts are likewise similar. The Ventura County Air Pollution Control Board will use the information contained in the Final EIR in evaluating the proposed amendments to Rule 74.2, Architectural Coatings, set forth in Appendix A.

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ATTACHMENT 1

FINAL ENVIRONMENTAL IMPACT REPORT

PROPOSED AMENDMENTS TO APCD RULE 74.2, ARCHITECTURAL COATINGS

Ventura County Air Pollution Control District

669 County Square Drive
Ventura, California 93003

State Clearinghouse # 2001061106

November 2009

The Environmental Report Review Committee recommends that the Ventura County Air Pollution Control Board find that this document has been completed in compliance with the California Environmental Quality Act.

Bruce Smith — 11/19/09

Chair, Environmental Report Review Committee — Date

Foreward

The Ventura County Air Pollution Control District (VCAPCD, or District) in compliance with the California Environmental Quality Act (CEQA) of 1970 has prepared this draft environmental impact report (EIR). An EIR is an informational document that must be prepared and considered by public agencies prior to the approval or disapproval of a project that may have a significant impact on the environment. The purpose of this report is to provide public agencies and the public with detailed information about any effect that a proposed project is likely to have on the environment, to list ways that any potentially significant adverse effects of the project might be minimized, and to suggest alternatives to the proposed project.

The proposed project, which is the subject of this EIR, is a new and improved version of an air pollution control regulation (Rule 74.2) designed to reduce the ozone precursor reactive organic compound (ROC[1]) emissions from the use of architectural coatings. Since the intent of this new regulation is to improve environmental quality, there is no need to list ways to minimize potentially significant adverse effects.

According to the County of Ventura Administrative Supplement to the State CEQA Guidelines last amended August 3, 1999, (Section 5.4, Special Situations, page 16), an agency may reuse an EIR, previously prepared and certified for one project, for another project if an Initial Study shows that the previous EIR adequately describes the current project's setting, impacts, alternatives, and mitigation measures. According to the Initial Study (Appendix C) for this project, the previous 2001 Final EIR for Proposed Amendments to Rule 74.2, Architectural Coatings, can reused based on the following:

1. The proposed project, Proposed Amendments to Rule 74.2, Architectural Coatings, is a more stringent version of Rule 74.2, and will further reduce ROC emissions from the use of architectural coatings and will further improve air quality. Since the air pollution source being regulated by is identical to the previous project, and the control measure being implemented is similar, i.e., the requirement to use architectural coatings that are more environmentally friendly, the reuse of the 2001 Final EIR adequately describes the settings and impacts for the 2010 Proposed Amendments to Rule 74.2.

2. The issues raised by architectural coating manufacturers during the 2001 Final EIR that the rule requirements, which mandate the use of lower ROC content coatings, are counter productive to air quality are identical to those raised recently during hearings at the California Air Resources Board during the adoption of the 2007 Suggested Control Measure (SCM). The SCM is virtually identical to proposed amendments to Rule 74.2, and these issues were addressed in the 2001 Final EIR and 2009 Initial Study for this project.

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[1] In this report, the acronym ROC for Reactive Organic Compounds is identical in meaning to VOC for Volatile Organic Compounds.

3. When the Air Resources Board (ARB) adopted the 2007 SCM for Architectural Coatings, the basis for proposed amendments to Rule 74.2, ARB staff relied on the 2000 Program EIR as the foundation for their environmental analysis. Because ARB is a certified regulatory agency under CEQA, they have the ability to perform an Environmental Assessment instead of an EIR. This assessment in the 2007 Technical Support Document for the SCM contains similar analysis to that done in the original Program EIR, and was reviewed as part of the preparation for this draft EIR.

Prior to the reuse of an EIR, the agency must provide the following:

1. Provide public notice that the previous EIR will be used as a draft EIR.
2. Respond to public comments received in response to the notices, and
3. Complete the remaining steps in the CEQA process.

On May 18, 2009, VCAPCD mailed a Notice of Preparation of a draft EIR, and a Notice of a Public Consultation Meeting scheduled for June 18, 2009, and made an Initial Study available to all interested parties (see Contact List, Appendix D) by posting this document on the VCAPCD website (www.vcapcd.org) and submitting copies to the State Clearinghouse. This notice stated that VCAPCD, as the Lead Agency, is proposing to reuse the September 2001 Final EIR on Proposed Amendments to Rule 74.2, as the draft EIR for this project. No comments on this proposal were received either by mail, email, or at the June 18, 2009, meeting on this proposal. Also, we received no comments on the Initial Study during the 30 day review period which ended on June 29, 2009.

However, we did receive three (3) comments letters from coating manufacturers that raised their concerns with the proposed air pollution control regulatory requirements in proposed amendments to Rule 74.2 rather than any CEQA related issues. These comments and VCAPCD's response to these comments may be found in Appendix II of the Staff Report on Proposed Amendments to Rule 74.2 (Appendix B). In response to these comments, VCAPCD is proposing to designate three organic solvents as exempt Reactive Organic Compounds(ROC) under Proposed Amendments to Rule 2, Definitions. These solvents, which have already been classified as exempt by the Environmental Protection Agency (EPA), include tert-butyl acetate, dimethyl carbonate, and propylene carbonate. In addition, the South Coast AQMD is proposing to exempt these solvents as Class I exempt VOCs. Both tert-butyl acetate and dimethyl carbonate are insoluble in water so both may only be used in oil based coatings. The use of propylene carbonate in some cosmetics demonstrates its safety relative to public health.

The Ventura County Air Pollution Control Board will use the information contained in this Final EIR in evaluating the proposed amendments to Rule 74.2, Architectural Coatings set forth in Appendix A.

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Final Environmental Impact Report

Proposed Amendments: Rule 74.2, Architectural Coatings

SCH No.: 2001061106

Ventura County
Air Pollution Control District

September 2001

The Environmental Report Review Committee recommends that the Ventura County Air Pollution Control Board find that this document has been completed in compliance with the California Environmental Quality Act.

Bruce Smith — *Chair, Environmental Report Review Committee*

9/20/01 — *Date*

Final Environmental Impact Report

Proposed Amendments to Rule 74.2, Architectural Coatings

Ventura County Air Pollution Control District

September 2001

State Clearinghouse No.: 2001061106

Prepared by:

Ventura County Air Pollution Control District

669 County Square Drive, 2nd Floor
Ventura, CA 93003

(805) 645-1400

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Preface

The Ventura County Air Pollution Control District (VCAPCD, or District) in compliance with the California Environmental Quality Act of 1970[1] has prepared this environmental impact report (EIR). An EIR is an informational document that must be prepared and considered by public agencies prior to the approval or disapproval of a project that may have a significant impact on the environment. The purpose of the report is to provide public agencies and the public with detailed information about the effect that a proposed project is likely to have on the environment, to list ways that any potentially significant adverse effects of the project might be minimized, and to suggest alternatives to the proposed project.

The Ventura County Air Pollution Control Board (Board) will use the information contained in this EIR in evaluating the proposed amendments to Rule 74.2, Architectural Coatings. The proposed amendments are set forth in Appendix A.

The District scheduled a 45-day public comment period, which will ran from July 31 to September 14, 2001. Reviewers who wished to comment on the draft EIR were urged to submit written comments to the person and address noted below by September 14, 2001. Reviewers also could submit oral comments during the Environmental Report Review Committee (ERRC) meeting held on September 19, 2001 at 1:30 p.m. The District did not receive any written comments on the draft EIR. Moreover, the ERRC did not receive any oral comments during its September 19, 2001 meeting on the draft EIR and recommended that the Ventura County Air Pollution Control Board find that the EIR was completed in compliance with the California Environmental Quality Act. The Ventura County Air Pollution Control Board is scheduled to consider certification of the Final EIR and adoption of the proposed rule amendments at a public hearing on November 11, 2001 at 11:00 a.m. at the Ventura County Board of Supervisors Hearing Room, Administration Building, Ventura County Government Center, 800 S. Victoria Avenue, Ventura, California.

Contact: Ventura County Air Pollution Control District
669 County Square Drive, 2nd Floor
Ventura, CA 93003

Attn: Stan Cowen
(805) 645-1408

Copies of the Final EIR, the current rule, the proposed rule amendments, and staff report may also be viewed on the Internet at www.vcapcd.org

[1] Public Resources Code (PRC), §21000 et seq.

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Summary

A. Introduction

Architectural coatings are coatings applied to stationary structures and their appurtenances, and include house paints, stains, industrial maintenance coatings, and traffic coatings.[2] The use of architectural coatings in California results in substantial emissions of volatile organic compounds (VOCs), which contribute to the formation of ozone and particulate matter (PM). These two pollutants pose Ventura County's – and California's – most serious air quality problems. State and federal law requires that Ventura County attain and maintain the applicable ambient air quality standards for these pollutants.

Control of air emissions from architectural coatings is primarily the role of the local air pollution control and air quality management districts (districts). Widespread regulation of architectural coatings began in 1977, when the California Air Resources Board (ARB) adopted a Suggested Control Measure (SCM) for architectural coatings. Many districts adopted architectural coatings rules based on this SCM, as well on subsequent revisions to the SCM approved by ARB in 1985 and 1989. The VCAPCD adopted its architectural coatings rule, Rule 74.2, Architectural Coatings, based on the ARB SCM in 1979. The VCAPCD subsequently amended Rule 74.2 in 1980, 1982, 1983, 1986, 1991, and 1992.

ARB, in cooperation with the local districts, again amended its SCM for architectural coatings in June 2000. According to the ARB, the revised SCM reflects both the advances in coatings technologies over the past 10 years, and the need for further emission reductions to attain health-based air quality standards in many districts.

In accordance with the California Environmental Quality Act (CEQA),[3] the ARB, as lead agency, prepared a Program Environmental Impact Report (PEIR) prior to approving the latest architectural coatings SCM. The CEQA Guidelines encourages the use of a PEIR when agencies are evaluating the issuance of "rules, regulations, plans, or other general criteria."[4] The ARB anticipated that local air districts would rely upon the PEIR when conducting their own environmental evaluation of the SCM.[5]

The ARB PEIR included an analysis of environmental impacts that could potentially result from implementation of local architectural coatings rules based on the SCM. The ARB prepared and

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[2] A definition of "architectural coatings" can be found in the text of the proposed Rule 74.2 (Appendix A of this EIR).
[3] Public Resources Code (PRC), §21000 et seq.
[4] 14 California Code of Regulations (CCR), §15168, subs. (a)(3)
[5] ARB Final PEIR, pp. I-2 to I-4.

published a Notice of Preparation and Initial Study (NOP/IS) for the PEIR and allowed a 30-day review and comment period, which ended July 22, 1999. The NOP/IS identified potential adverse impacts in the following areas: air quality, water, public services, transportation/circulation, solid waste/hazardous waste, and hazardous substances. ARB then prepared a Draft PEIR, which it distributed to responsible agencies and interested parties for a 45-day review and comment period. The comment period ended April 7, 2000. The Draft PEIR contained a detailed discussion and evaluation of the environmental impacts identified in the NOP/IS, mitigation measures for the potentially significant impacts, and alternatives to the proposed SCM. The ARB certified the Final PEIR and adopted the SCM on June 22, 2000.

VCAPCD prepared and published a Notice of Preparation and Initial Study (NOP/IS) for the proposed amendments to Rule 74.2, Architectural Coatings, and allowed a 30-day review and comment period, which ended June 23, 2001. The NOP/IS identified potential adverse impacts in the following areas: air quality, water, public services, transportation/circulation, solid waste/hazardous waste, and hazardous substances. Therefore, as required by CEQA, an EIR was prepared for the proposed Rule 74.2 amendments. The NOP/IS and this Final EIR are tiered from the ARB-certified PEIR as permitted and encouraged by CEQA. CEQA requires that environmental impact reports be tiered whenever feasible. Tiering means using the information and analyses of general matters contained in a broader EIR.[6] Accordingly, this analysis incorporates the ARB PEIR by reference.[61] Relevant sections of the ARB PEIR are summarized as appropriate throughout this EIR and their relationship to this EIR are described.[62]

This Final EIR looks at the ARB PEIR and analyzes whether proposed Rule 74.2 may cause significant effects on the environment that were not examined in the ARB PEIR. Although the ARB PEIR thoroughly analyzed air quality impacts, the VCAPCD elected to do a critical analysis of these issues in this EIR to ensure that there would be no new or more significant impacts in Ventura County.

Copies of the ARB Final PEIR (SCH No. 99062093) are available at:

Street Address:	California Air Resources Board *or* CalEPA Headquarters Building 1001 I Street Sacramento, CA 95814	Ventura County APCD 669 County Square Drive, 2nd Floor Ventura, CA 93003
Internet Address:	www.arb.ca.gov/arch/CEQA/FEIR.htm	

[6] 14 CCR, §15152, subd. (a)
[61] 14 CCR, §15150
[62] 14 CCR §15150(c)

Economic and Social Effects. A discussion of the economic and social effects of the proposed rule amendments for Rule 74.2 is contained in the District staff report for the Ventura County Air Pollution Control Board. This District staff report dated July 25, 2001, for the proposed amendments to Rule 74.2, Architectural Coatings, is hereby incorporated by reference and is presented in Appendix B.

B. Legal Authority

The California Clean Air Act (CCAA) establishes a comprehensive air pollution control program.[7] Under this program, the responsibility for controlling air pollution in California is shared by the ARB and the local districts. The districts have the primary responsibility, subject to ARB oversight, to adopt control measures for nonvehicular sources of air pollution, including architectural coatings.[8]

The ARB has the responsibility to adopt control measures for vehicular sources of air pollution in California.[9] The CCAA also assigned numerous other duties to ARB. For example, the ARB is charged with coordinating efforts to attain and maintain federal and state ambient air quality standards, and conducting research into the causes of and solutions to air pollution;[10] providing technical assistance to the districts;[11] coordinating, encouraging, and reviewing the districts' efforts to attain and maintain air quality standards;[12] and doing other such acts as may be necessary for the proper execution of the powers and duties imposed upon the ARB by the CCAA and any other provision of law.[13] To fulfill these statutory mandates, the ARB provides guidance and assistance to the districts, including development of model rules such as the SCM for architectural coatings.

The District is designated a severe nonattainment area for the federal and state ozone standards. The California Clean Air Act requires areas designated as severe nonattainment for ozone to adopt control measures required in §§40913, 40914, and 40919 of the California Health and Safety Code (HSC):

- Section 40913 requires districts to develop a plan to achieve California's ambient air quality standards by the earliest practicable date. Control Measure R-303 in the District's 1997 Revision to the Air Quality Management Plan includes the proposed revisions to Rule 74.2. Rule 74.2 is being amended to implement Control Measure R-303.

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[7] California Health and Safety Code (HSC), §39000 et seq.
[8] HSC, §§39002, 40000, 40001, and 40702
[9] HSC, §§39002 and 40000
[10] HSC, §39003
[11] HSC, §§39605 and 40916
[12] HSC, §§39500 and 41500
[13] HSC, §39600

- Section 40914 requires each district plan to demonstrate that the plan includes "every feasible measure." Districts must adopt the most effective control measures to reduce VOC emissions from architectural coatings. An ARB letter dated December 8, 2000 identifies the SCM as a "feasible measure" that should be adopted by districts that are required to prepare California Clean Air Act triennial progress reports and plan revisions. Rule 74.2 is being amended to meet this requirement.

- Section 40919 requires districts with serious nonattainment for ozone to adopt Best Available Retrofit Control Technology (BARCT) for all existing sources. BARCT means an emission limitation that is based on the maximum degree of reduction achievable, taking into account environmental, energy, and economic impacts by each class or category of sources (HSC §40406). District staff has found that the SCM requirements meet the BARCT requirement, and therefore, the proposed rule revisions meet the requirements of HSC §40919.

C. Emission Reductions

The proposed rule amendments, if adopted will reduce VOC emissions by 0.4 tons per day upon full implementation.

D. Executive Summary

The organization of this EIR is as follows: Chapter I – Summary; Chapter II – Project Description; Chapter III – Environmental Impacts and Mitigation; Chapter IV – Required CEQA Topics; Chapter V – Project Alternatives; and Chapter VI – Organizations and Persons Consulted. The following subsections briefly summarize the contents of each chapter.

1. Chapter I – Summary

This chapter contains a discussion of the legal authority of the ARB to adopt SCMs as guidance to local districts and the VCAPCD's responsibility to adopt control measures for nonvehicular sources of air pollution, including architectural coatings. In addition, this chapter contains a discussion of the District's legal authority and mandate to adopt the proposed Rule 74.2 revisions. This chapter also provides a summary of the contents of each chapter.

2. Summary of Chapter II – Project Description

In addition to including a description of the project location, Chapter II also includes a brief description of the proposed rule amendments. Briefly, the primary objective of the proposed rule amendments are to set feasible VOC limits and other requirements (based on existing and

currently developing coatings technology) and that will achieve significant reductions in VOC emissions from architectural coatings to help Ventura County meet the mandated state and federal clean air standards for ozone. The proposed rule amendments also are intended to improve the clarity and enforceability of the current rule. The proposed rule amendments set allowable VOC content limits for a number of architectural coatings categories, including flats, nonflats, industrial maintenance, lacquers, floor, roof, rust preventative, stains, and primers, sealers, and undercoaters. The proposed VOC limits would become effective on various dates with complete implementation on January 1, 2003 (except for the industrial maintenance standard, which is January 1, 2004). For a complete description of the proposed rule, the reader is referred to Appendix A.

3. Summary of Chapter III – Environmental Impacts and Mitigation Measures

CEQA Guidelines §15126.2(a) require the following: "An EIR shall identify and focus on the significant environmental effects of the proposed project. Direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short-term and long-term effects."

The following subsections briefly summarize the analysis of the proposed project's environmental impacts identified as being potentially significant.

a. Air Quality

The adoption and implementation of the proposed rule amendments are expected to produce substantial long-term VOC emission reductions countywide. The EIR analyses conclude that no significant adverse air quality impacts will result from the proposed rule amendments. The proposed VOC content limits will result in a long-term reduction in VOC emissions of approximately 0.4 tons per day upon full implementation in 2004, yielding a net air quality benefit.

Some coating industry companies have claimed that lowering the VOC content of coatings results in increased VOC emissions for a variety of reasons: increased coating thickness, more thinning, more topcoats, more touch-ups, more priming, more frequent re-coating, more substitution with higher VOC coatings, and greater reactivity. These companies claim that new formulations result in more coating use, resulting in an overall increase in VOC emissions for a specific area covered or over time. Industry also asserts that more reactive solvents will be used in compliant formulations than those used in existing coatings, thus contributing to increased ozone formation. The analyses reveal that overall, the proposed rule amendments will achieve significant VOC emission reductions and the claimed adverse impacts are not anticipated to occur.

Another claim made by some companies is that increased application of acetone-based coatings has the potential to increase objectionable odors. However, acetone used as a replacement for other traditional solvents may have fewer odor impacts because it has a higher odor threshold than many other solvents currently used in coatings.

The analyses also conclude that cumulative impacts are insignificant, and no significant project-specific impacts are anticipated. Therefore, no mitigation measures are necessary.

b. Water

Impacts on water resources are divided into several categories: water quality, water supply (quantity), and wastewater impacts. Water impacts are considered significant if any of the following criteria are met:

Groundwater Quality:

- A proposal that will degrade the quality of groundwater and cause groundwater to fail to meet groundwater quality objectives.
- If the groundwater quality impact is unknown, and there is evidence that the proposed project could cause the quality of groundwater to fail to meet the groundwater quality objectives, the project shall be considered to have a potentially significant impact until such time as reliable studies determine otherwise.

Surface Water Quality:

- A proposal that will degrade the quality of surface water and cause it to fail to meet surface water quality objectives.
- If the surface water quality impact is unknown or the quality of surface water in a hydrologic unit is unknown, the impact is unknown and must be determined by additional investigation.

Water Supply – Quality: Domestic water available to development must be in compliance with the applicable State Drinking Water Standards, as described in Title 22 of the California Code of Regulations, §64421 et seq.

Water Supply – Quantity: This item is either considered potentially significant or not significant based on whether the General Plan requirement is met. A source of water supplied by the following shall be determined to constitute a permanent supply of water: Casitas Municipal Water District; United Water Conservation District; cities, water companies, districts, mutuals, public sources – unless there is a special known adverse situation; groundwater in an area where it is certain that a properly designed and constructed well will produce a long term supply; and, wells that have successfully completed the Water Resource Division's pump test.

Sewage Collection/Treatment Facilities: Any project that would individually or cumulatively generate sewage effluent which would be discharged to and exceed the capacity of an existing sewer main or sewage treatment plant.

i. Water Quality

The proposed rule amendments are not expected to adversely impact water quality. First, use of replacement solvents is expected to result in equivalent or fewer water quality impacts than currently used solvents, since the replacement solvents are generally considered less toxic. Second, because currently available compliant coatings are already using waterborne technology, no additional water quality impacts from future compliant waterborne coatings are expected. There is no evidence that the current manufacturing and cleanup practices associated with waterborne coatings will change as a result of the proposed rule amendments. The proposed rule amendments are not expected to promote the use of compliant coatings formulated with hazardous solvents that could create water quality impacts. Finally, increases in wastewater flow to the wastewater treatment plants as a result of the proposed project are considered negligible.

The analysis concludes that cumulative impacts are insignificant, and no significant project-specific impacts are anticipated. Therefore, no mitigation measures are necessary.

ii. Water Demand

Increased water demand from the manufacturing and use of compliant waterborne coatings was evaluated. The analysis concluded that water demand impacts associated with the proposed rule amendments will be insignificant.

The analysis concluded that cumulative impacts are insignificant, and no significant project-specific impacts are anticipated. Therefore, no mitigation measures are necessary.

c. Public Services

Public Services impacts are considered significant if any of the following criteria are met:

Fire Protection – Distance/Response Time: Project distance from a full-time paid fire department is considered a significant impact if the project is in excess of five (5) miles, measured from the apron of the fire station to the structure or pad of the proposed structure. Fire sprinklers will mitigate the impact and will be required as per Ordinance 14. If it appears that a response time would be in excess of 12 minutes, it would signify a significant impact.

Public Services Facilities – Fire, Law Enforcement/Emergency Services, Education, Recreation: If the project results in a substantial amount of additional personnel, equipment, or materials to

any of the above-mentioned public service facilities, the project will have a significant adverse impact.

i. Fire Protection

The increased use of exempt solvents or other replacement solvents as a result of implementing the proposed rule amendments will not result in any significant increased need for fire protection. Although acetone, which is flammable, is expected to be used to reformulate a limited number of coatings (e.g., lacquers), it is unlikely that implementation of the proposed rule amendments will substantially increase the future use of acetone. The flammability ratings of many conventional solvents used in architectural coatings are the same order of magnitude as acetone, so there would be no net change or possibly a reduction in the hazard consequences from replacing some conventional solvents with acetone.

ii. Public Facility Maintenance

This section examines the potential for increased maintenance at public facilities due to implementing the proposed rule amendments. Infrastructure needs at public facilities are not expected to be impacted due to more frequent touchups to maintain facility appearance, equipment, or safety. Implementation of the proposed rule amendments is also not expected to result in the need for new or altered public facilities.

The analysis concludes that cumulative impacts are insignificant, and no significant project-specific impacts are anticipated. Therefore, no mitigation measures are necessary.

d. Transportation/Circulation

Transportation/circulation impacts are considered significant if the project would cause the level of service (LOS) at a roadway segment or intersection to fall to a less-than-acceptable level.

The potential additional vehicle trips caused by the disposal of coatings due to the possibility of shorter shelf or pot lives or lesser freeze-thaw capabilities were evaluated. The analysis concludes that cumulative impacts are insignificant, and no significant project-specific impacts are anticipated. Therefore, no mitigation measures are necessary.

e. Solid Waste/Hazardous Waste

Solid waste impacts are considered significant if the project would result in additional demand for solid waste disposal in the county and the County has reason to believe that there is less than 15 years of disposal capacity available for county disposal. Hazardous waste impacts are considered significant if the project results in the storage, handling, or disposal of hazardous waste that is not in conformance with applicable regulations.

The solid waste/hazardous waste analysis examined increased disposal of compliant coatings due to the possibility of shorter shelf or pot lives or lesser freeze-thaw capabilities.

The analysis concluded that cumulative impacts are insignificant, and no significant project-specific impacts are anticipated. Therefore, no mitigation measures are necessary.

f. Hazards

Above-ground hazardous materials impacts are evaluated on a case-by-case basis, and the determination of whether the impacts are considered significant depend on the following factors:

- Individual or cumulative physical hazard of material or materials.
- Amounts of materials on-site, either in use or storage.
- Proximity of hazardous materials to populated areas and compatibility of materials with neighboring facilities.
- Federal, state, and local laws and ordinances, governing storage and use of hazardous materials.
- Potential for spill or release.
- Proximity of hazardous materials to receiving waters or other significant environmental resource.

Significance for public health impacts also must be determined on a case-by-case basis. The determination of significance depends on the project type, location, and other environmental factors.

i. Risk of Upset

Any increase in accidental releases of future compliant coatings materials would be expected to result in a concurrent reduction in the number of accidental releases of existing coatings materials. Further, it is anticipated that resin manufacturers and coatings formulators will continue the trend of using less hazardous solvents such as Texanol and propylene glycol in their compliant coatings. It is expected that future compliant coatings will contain less hazardous materials, or nonhazardous materials, as compared to conventional coatings, resulting in a net benefit with respect to potential upset risks.

The analysis concludes that cumulative impacts are insignificant, and no significant project-specific impacts are anticipated. Therefore, no mitigation measures are necessary.

ii. Human Health

Industry representatives have asserted that low-VOC compliant coatings will contain compounds that are more toxic than current formulations. The ARB PEIR evaluated potential human health

impacts associated with the use of these replacement solvents. The ARB PEIR analysis concluded that significant adverse human health impacts [including carcinogenic, chronic (non-carcinogenic), and acute health effects] are not anticipated to occur as a result of replacement solvents being used due to implementation of the SCM statewide.

In addition, the PEIR addressed human health impacts that were alleged to occur due to an increase in sandblasting operations, which would result in increased human exposure to crystalline silica, a carcinogen. The PEIR analysis concluded that an increase in sandblasting activities is not anticipated as a result of implementation of the SCM.

District staff has reviewed this information and have determined that these conclusions regarding human health impacts are also applicable to Ventura County.

The analysis concluded that cumulative impacts are insignificant, and no significant project-specific impacts are anticipated. Therefore, no mitigation measures are necessary.

Table I-1 summarizes the impacts and mitigation measures associated with the environmental impact areas analyzed for the proposed rule amendments.

Table I-1 – Environmental Impacts From Implementation of Rule 74.2

Environmental Impact Area	Significance Determination Project Specific	Significance Determination Cumulative	Mitigation Measures
Air Quality	Not Significant	Not Significant	None Required
Water			
Water Demand	Not Significant	Not Significant	None Required
Water Quality	Not Significant	Not Significant	None Required
Public Services			
Fire Protection	Not Significant	Not Significant	None Required
Public Facility Maintenance	Not Significant	Not Significant	None Required
Transportation/Circulation	Not Significant	Not Significant	None Required
Solid Waste/Hazardous Waste	Not Significant	Not Significant	None Required
Hazards			
Risk of Upset	Not Significant	Not Significant	None Required
Human Health	Not Significant	Not Significant	None Required

4. Summary of Chapter IV – Required CEQA Topics

a. Environmental Impacts Found Not to be Significant

The ARB Initial Study for the SCM includes an environmental checklist of 15 environmental categories. Review of the proposed project at the NOP/IS stage identified six areas for further review in ARB's Final PEIR. For the remaining nine environmental areas where the Initial Study concluded that the project would have no significant direct or indirect adverse effects, no comments were received on the NOP/IS or at the public meetings that changed this conclusion. VCAPCD staff conducted its own Initial Study and determined that there will be no significant impacts to the following environmental resources in Ventura County as a result of implementing the proposed rule amendments:

- General Plan Environmental Goals and Policies
- Land Use
- Water Resources – Groundwater and Surface Water Quantity
- Mineral Resources
- Biological Resources
- Agricultural Resources
- Visual Resources
- Paleontological Resources
- Cultural Resources
- Energy Resources
- Coastal Beaches & Sand Dunes
- Seismic Hazards
- Geologic Hazards
- Hydraulic Hazards
- Aviation Hazards
- Fire Hazards
- Hazardous Materials/Waste – Belowground Hazardous Materials
- Noise and Vibration
- Glare
- Transportation/Circulation – Safety/Design, Tactical Access, Facilities and Services
- Water Supply – Fire Flow
- Waste Treatment/Disposal – Individual Disposal Systems and Solid Waste Facilities
- Utilities
- Flood Control/Drainage
- Law Enforcement/Emergency Services – Personnel/Equipment
- Recreation – Regional Trails/Corridors

b. Irreversible Environmental Changes

CEQA requires EIRs to address the potential for irreversible environmental changes. Consistent with CEQA, additional analysis of the proposed project confirms that it would not result in irreversible environmental changes or the irretrievable commitment of resources.

c. Potential Growth Inducing Impacts

CEQA requires EIRs to address the potential for growth-inducing impacts. Consistent with CEQA, additional analysis of the proposed project confirms that it would not foster economic or population growth or the construction of new housing.

d. Consistency with Other Plans

CEQA requires that an EIR address any inconsistency between the proposed project and applicable general plans and regional plans. Consistent with CEQA, analysis of the proposed project confirms that the project is consistent with State Implementation Plans, California Clean Air Act plans, and other regional plans.

5. Summary of Chapter V – Project Alternatives

Chapter V provides a discussion of alternatives to the proposed project. The alternatives analyzed include measures for attaining the objectives of the proposed project and provide a means for evaluating the comparative merits of each alternative.

Our analysis includes eight concepts that could possibly be further developed into project alternatives. These concepts included a low vapor pressure exemption, performance-based standards, reactivity-based standards, product line averaging, regional regulation, seasonal regulation, modification of the VOC content limits/final compliance deadlines, and exceedance fees.

Alternatives the staff rejected as infeasible include the low vapor pressure exemption, performance-based standards, reactivity-based standards, regional regulation, seasonal regulation, and exceedance fees. Alternatives District staff considered feasible include the No Project alternative, the Extended Compliance Deadlines alternative, and the Further Reduction of VOC Content Limits alternative. The proposed Rule 74.2 revisions include provisions of the product line averaging alternative proposed in the ARB PEIR. The rationale for the staff's conclusions is presented in Chapter V.

II. Project Description

A. Project Location

The proposed revisions to Rule 74.2, Architectural Coatings, would apply within the jurisdiction of the Ventura County Air Pollution Control District (District). The District covers all of Ventura County, California (Figure II-1). Ventura County covers an area of 1,873 square miles and is located along the southern portion of the California coast between Santa Barbara and Los Angeles Counties.

The administrative offices of the Ventura County Air Pollution Control District are located at 669 County Square Drive, 2nd Floor, Ventura, CA 93003.

B. Proposed Amendments to Rule 74.2, Architectural Coatings

The proposed project is to adopt amendments to Rule 74.2, Architectural Coatings, to incorporate, with appropriate modifications, the volatile organic compound (VOC) limits and other requirements contained in the Suggested Control Measure (SCM) for Architectural Coatings adopted by the California Air Resources Board (ARB) on June 22, 2000. The SCM sets allowable VOC content limits and other requirements (based on existing and currently developing coating technologies) for a number of architectural coating categories, including flats, nonflats, industrial maintenance, lacquers, floor, roof, rust preventative, stains, and primers, sealers, and undercoaters. The proposed VOC limits would become effective on various dates with complete implementation on January 1, 2004.

The revised Rule 74.2 would apply to any person who supplies, sells, offers for sale, or manufactures any architectural coating for use within the District, as well as any person who applies or solicits the application of any architectural coating within the District. Appendix A presents the proposed revisions to Rule 74.2 in strikeout/underline format. Further information regarding ARB's SCM for architectural coatings is presented in the ARB Final Program EIR.

The proposed revisions to Rule 74.2 involve lowering the VOC content limit for a number of architectural coating categories. The proposed revisions also include increasing the VOC content limits for two coating categories, however. The proposed revisions to increase the VOC content limits for certain architectural coating categories are being proposed because coatings that meet the current VOC limits in Rule 74.2 for those categories may not be available. These revised VOC limits will be consistent with the corresponding limits in the SCM. The subject categories are Antenna Coatings and Temperature-Indicator Safety Coatings. The amount of emission reductions that will be lost as a result of raising the VOC limits for these two coating categories is considered negligible and will be more than offset by emission reductions from other coating

categories. The current and proposed VOC limits for these categories are indicated in Appendix A (Reference: Page 3 of Proposed Rule 74.2).

Provisions for product-line averaging are included in the proposed rule amendments. These provisions add a short-term averaging compliance option to the rule. It allows manufacturers to average designated coatings such that their average cumulative emissions are less than or equal to the cumulative emissions that are allowed under the rule. The averaging is only in effect from January 1, 2003 until January 1, 2005. Proposed Rule 74.2 also includes a VOC ceiling (maximum VOC limit) that applies to the product line averaging provision. The VOC ceiling table was not included in the SCM; it is an issue that came up as ARB and the South Coast AQMD were working on specific guidelines for the averaging program. The VOC ceiling represents the most common district limit in effect when the SCM was approved in June 2000.

C. Project Objective

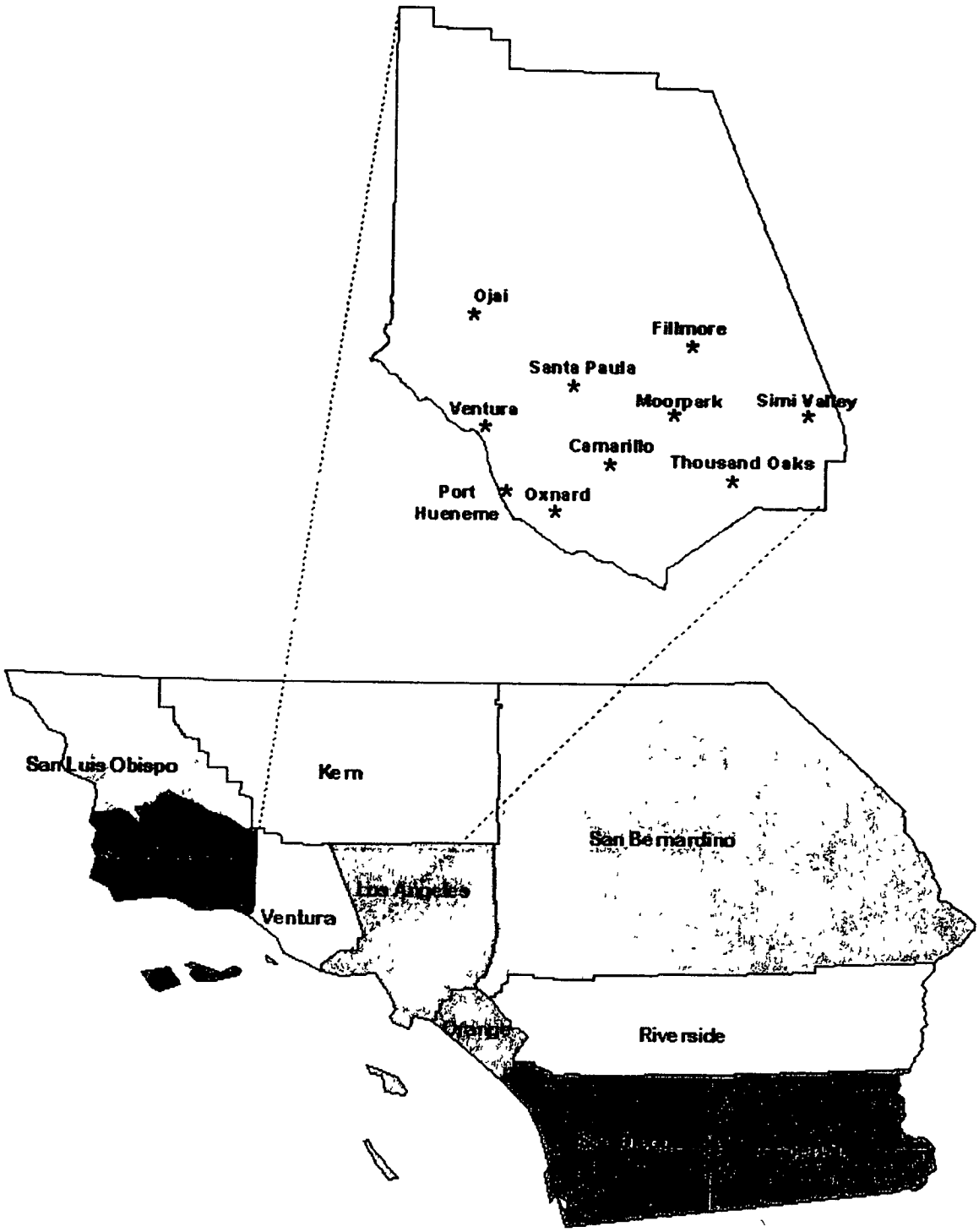
The purpose of this project is to reduce VOC emissions by incorporating lower VOC limits and other requirements for architectural coatings. These emission reductions are necessary for Ventura County to attain state ambient air quality standards for ozone as required by the California Clean Air Act. The total countywide reduction in VOC emissions from these proposed revisions to Rule 74.2 is approximately 0.4 tons per day, or 146 tons per year.

D. Approvals Required

To implement the project, adopting the proposed revisions to Rule 74.2 by the Ventura County Air Pollution Control Board is required. The Air Pollution Control Board is the governing board of the District.

FIGURE II-1

Project Location: Ventura County



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III. Environmental Impacts and Mitigation

Environmental impact reports must identify the potentially significant environmental effects that may result from a proposed project. The EIR analysis must include direct and indirect significant effects of a project, as well as short- and long-term impacts. The discussion of environmental impacts should include, but is not limited to the following: physical changes; alterations of ecological systems; health and safety problems caused by physical changes; and other aspects of the resource base, including water, scenic quality, and public services. If the lead agency identifies potentially significant adverse environmental impacts, the EIR must discuss mitigation measures that could either avoid or substantially reduce any adverse environmental impacts.

The degree of specificity required in a CEQA document depends on the type of project being proposed. For example, the environmental document for projects such as the adoption or amendment of a comprehensive zoning ordinance or a local general plan should focus on the secondary effects that can be expected to follow from the adoption or amendment. The analysis need not be as detailed as the analysis of the specific construction projects that might follow, however. CEQA and the CEQA Guidelines establish the categories of environmental impacts that generally should be evaluated. The CEQA Guidelines establish a checklist that lists 16 environmental categories to be addressed when determining whether to prepare an EIR, for use by public agencies. ARB prepared an initial study, based upon this checklist, prior to preparing the Draft PEIR.

VCAPCD reviewed the ARB Initial Study when it conducted its own Initial Study to determine the scope of this EIR. On June 22, 2001, VCAPCD sent a Notice of Preparation including the Initial Study to responsible and trustee agencies. The Initial Study included a brief summary of the potential environmental effects of the rule adoption. Of the 30 potential environmental impact categories on the checklist, VCAPCD determined that an EIR should be prepared to address potentially significant impacts for the following categories: air quality, water, public services, transportation/circulation, solid waste/hazardous waste, and hazards. The following sections analyze the potential adverse environmental impacts associated with implementing the proposed amendments to Rule 74.2, Architectural Coatings.

General Environmental Setting

The project, which involves revisions to Rule 74.2, impacts the entire area of Ventura County, California. Thus, the environmental setting for this project is the entire area of Ventura County.

Ventura County is located along the southern portion of the California coast between Santa Barbara and Los Angeles Counties. Its diverse topography is characterized by mountain ranges to the north, two river valleys (the Santa Clara, which trends east-west, and the Ventura, which

trends roughly north-south), and the Oxnard Plain to the south and west. Generally, steep hills border the river valleys. Bluffs dominate the coastline north of the mouth of the Ventura River, while the coastline south of the Ventura River to Point Mugu is near sea level. The Santa Monica Mountains rise above the Oxnard Plain and continue east into Los Angeles County.

The climate is dominated by the county's coastal location and is characterized by cool winters and generally moderate summers. Marine air influences the climate throughout the year. Rain occurs mostly from November through April. The summer months are generally dry. The average annual temperature in this region ranges from the upper fifties at Point Mugu to the mid-sixties in Simi Valley. Average annual rainfall varies between about 13 inches in Camarillo to about 27 inches near Ojai. Annual average relative humidity is 75 percent at coastal locations (e.g., Point Mugu) and 64 percent at inland locations (e.g., Simi Valley). Fog and low clouds are common with inland locations typically having a lower percentage of cloud cover than coastal areas. Winds are dominated by a diurnal land-sea breeze cycle resulting in nighttime gentle movement of air out to sea and a stronger afternoon land breeze. The net result of the winds is to move air onshore, which can lead to a buildup of pollutants over several days. The buildup may be aggravated by atmospheric inversions that prevent vertical dispersion of air pollutants.

Outside urban and agricultural areas, the countryside is dominated by sage brush, chaparral scrub, and oak forest plant communities typical of a Mediterranean climate. These generally cover the lower hillsides and southern exposures of higher slopes while conifer forests typically occur in deep valleys and on the northern slopes of higher elevations.

The majority of the population in the county lives in the incorporated cities of Oxnard, Port Hueneme, Ventura, Ojai, Santa Paula, Fillmore, Camarillo, Moorpark, Thousand Oaks, and Simi Valley.

Agriculture is the dominant non-urban activity in the Oxnard Plain, along much of the river valleys, and on the neighboring hillsides. The tourist industry is also an important economic activity in many parts of Ventura County, including the Ojai Valley area and along the coast. Finally, petroleum production remains an important activity in the region, although production rates have been declining over the past 20 to 30 years.

A. Air Quality

1. Environmental Setting

VOC emissions contribute to the formation of both ozone and PM_{10} (particulate matter less than 10 microns equivalent aerodynamic diameter). Ozone formation in the lower atmosphere results from a series of chemical reactions between VOC and nitrogen oxides in the presence of sunlight. PM_{10} is the result of both direct and indirect emissions. Direct sources of PM_{10} include

emissions from fuel combustion and wind erosion of soil. Indirect PM_{10} emissions result from the chemical reaction of VOCs, nitrogen oxides, sulfur oxides, and other chemicals in the atmosphere.

Ventura County violates state and federal standards for one criteria air pollutant: ozone. Ventura County also violates state ambient air quality standards for airborne particulates. The efforts of the Ventura County Air Pollution Control District are focused primarily on attainment of state and federal standards for these pollutants and maintaining the standards for all other criteria pollutants. Below is a brief description of each of Ventura County's non-attainment pollutants.

Ozone. Ozone, the main component of photochemical smog, is primarily a summer and fall air pollution problem. Ozone is not emitted directly into the air, but is formed through a complex series of photochemical reactions involving other compounds that are directly emitted. These directly emitted pollutants (also known as ozone precursors) include volatile organic compounds (VOC) and nitrogen oxides (NO_x). The time period required for ozone formation allows the reacting compounds to spread over a large area, producing a regional pollution problem.

Once formed, ozone generally remains in the atmosphere for one or two days. Ozone is then eliminated through chemical reactions with plants (reacts with chemicals on the leaves of plants), rainout (attaches to water droplets as they fall to earth), and washout (absorbed by water molecules in clouds and later falls to earth with rain).

The total contribution of VOC emissions from architectural coatings in Ventura County is estimated at 5.2 tons per day in the year 1996 (annual average). In future years this amount is expected to increase, approximately proportional to population increase within Ventura County.

Airborne Dust (PM_{10}) In Ventura County, PM_{10} emissions are generated by a variety of sources. The primary sources of PM_{10} in Ventura County include the following: dust, paved and unpaved roads, diesel exhaust, acidic aerosols, construction and demolition operations, soil and wind erosion, agricultural operations, residential wood combustion, and smoke. Also, indirect PM_{10} is formed via complex chemical reactions involving gas-to-particulate matter conversion processes in which VOCs can participate. PM_{10} can remain in the atmosphere for up to seven days before gravitational settling and rainout remove it.

2. Significance Criteria for Air Quality

The threshold of significance for a given environmental effect is that level at which the lead agency finds the effects of the project to be significantly adverse. According to the Office of Planning and Research (OPR), a threshold of significance can be defined as: "A quantitative or qualitative standard, or set of criteria, pursuant to which the significance of a given environmental effect may be determined." Significant effect on the environment means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and

objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.

The significance criteria used by the ARB in the PEIR certified for the adoption of the SCM (Table III-1) were adopted by the South Coast Air Quality Management District (SCAQMD) and were used in its analysis of the environmental impacts associated with implementation of SCAQMD Rule 1113 – Architectural Coatings.

Table III-1 – SCAQMD Air Quality Significance Thresholds

Mass Daily Thresholds		
Pollutant	**Construction**	**Operation**
NO_x	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM10	150 lbs/day	150 lbs/day
SO_x	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
TAC, AHM, and Odor Thresholds		
Toxic Air Contaminants (TACs) Accidental Release of Acutely Hazardous Materials (AHMs)	MICR $\geq$ 10 in 1 million* HI $\geq$ 1.0 (project increment) HI $\geq$ 5.0 (facility-wide) Federal Clean Air Act §112(r) threshold quantities	
Odor	Project creates or is subjected to an objectionable odor > 10 D/T	
NO_2 1-hour average annual average	 20 ug/m^3 (= 1.0 pphm) 1 ug/m^3 (= 0.05 pphm)	
PM10 24-hour annual geometric mean	 2.5 ug/m^3 1.0 ug/m^3	
Sulfate 24-hour average	 1 ug/m^3	
CO 1-hour average 8-hour average	 1.1 mg/m^3 (= 1.0 ppm) 0.50 mg/m^3 (= 0.45 ppm)	

* Note: For purposes of the human health impacts analysis in this PEIR, we used a MICR $\geq$ 1 in 1 million. Some districts use this threshold in their health risk analysis programs. MICR = maximum individual cancer risk; HI = Hazard Index; D/T = dilution to threshold factor; ug/m^3 = microgram per cubic meter; pphm = parts per hundred million; mg/m^3 = milligram per cubic meter; ppm = parts per million; TAC = toxic air contaminant; AHM = acutely hazardous material

3. Analysis of Potential Environmental Impacts

a. Industry Concerns

The following is a discussion and analysis of industry issues. For each issue area, VCAPCD staff reviewed the detailed analysis of these issues prepared by ARB and contained in Section IV, Subsection C of the PEIR prepared by the ARB staff for the SCM for architectural coatings. We also reviewed the comments received by ARB, and ARB's responses to comments. In addition, we considered the information compiled to date through ongoing studies by the SCAQMD with National Technical Systems (NTS), a testing program by the essential public service agencies (EPSA) and an analysis of the Harlan Associates Study prepared by Stan Cowen of the VCAPCD. The analysis and discussion in this EIR also considers the following update of the studies prepared since certification of the ARB PEIR.

SCAQMD Phase II Assessment Study of Architectural Coatings (NTS): In 1998, the South Coast Air Quality Management District (SCAQMD) initiated a performance study with National Technical Systems (NTS) to evaluate the following six architectural coating categories: Industrial Maintenance, Non-flats, Primers/Sealers/Undercoaters, Quick Dry Enamels, Quick Dry Primers/Sealers/Undercoaters and Waterproofing Sealers. The objective of the performance study was to conduct side-by-side laboratory and outdoor exposure tests for coatings with varying volatile organic compound (VOC) contents.

The study involved 31 manufacturers or brands, 94 coatings, 46 coating systems (e.g., primer and topcoat), and over 3000 test panels. The laboratory portion of the study was completed in 1999, and is summarized in Appendix E of the ARB staff report for the proposed Suggested Control Measure for Architectural Coatings, approved by the ARB Board on June 22, 2000. In general, the laboratory portions of the study revealed similar performance among high and low-VOC coatings.

The outdoor real time exposure testing is ongoing and includes a desert and coastal environment. The outdoor real time exposure will last for two years, and will not be completed until 2002. ARB staff will summarize the data at that time.

Essential Public Service Agencies (EPSA) Testing Program: In response to comments provided by the essential public service agencies (EPSA), the SCAQMD's May 1999 architectural coatings rule amendments established a new specialty category called "essential public service coating." The category is for protective coatings applied to components of power, municipal wastewater, water, bridges and other roadways, transmission or distribution systems during repair and maintenance procedures. The category includes coatings used by the EPSA that were previously included in the industrial maintenance coatings category. The essential public service category was created to allow additional time for EPSA to complete its lengthy administrative processes to identify and evaluate new coatings to replace those currently used for public

infrastructure. The category's VOC limit decreases (in SCAQMD Rule 1113) to 100 g/l by 2006, which matches the industrial maintenance category limit. Thus, the ESPA testing program will primarily focus on coatings capable of meeting the 100-g/l VOC limit. However, the program is also evaluating some coatings at the 250-g/l level.

Earlier this year, the members of EPSA entered into a memorandum of understanding (MOU) to accomplish their common coating performance testing goals. The EPSA membership consists of:

- Caltrans (California Department of Transportation);
- California Department of Water Resources (DWR);
- Los Angeles Department of Water and Power (LADWP); and
- Metropolitan Water District of Southern California (MWD).

A technical steering committee, consisting of representatives from each public service agency, SCAQMD, and ARB, has been established. The technical steering committee approved a test program design that includes test sequences, test procedures, and performance evaluation criteria. Coating selection and application is ongoing. The scope of testing will involve laboratory and field tests of compliant coatings and is expected to last a number of years even with expedited testing efforts. For example, the coating evaluation process at Caltrans entails a laboratory screening and characterization, including health and safety review (4 months), cyclic corrosion testing in the laboratory (8 months), field application tests (2 years), and specification development (2 years).

Southern California Alliance of Publicly Owned Treatment Works (SCAP) Testing Program

The Southern California Alliance of Publicly Owned Treatment Works (SCAP) represents over 55 government agencies involved in the treatment of recycling of water and wastewater. These agencies operate facilities and equipment that are exposed to a harsh environment. As a result of VOC limits specified in SCAQMD Rule 1113 and the ARB's Architectural Coatings SCM, SCAP has committed to evaluate the performance of low-VOC coatings suitable for wastewater environments. Their testing program includes laboratory and field tests that are being conducted to evaluate the performance, durability and application requirements of low-VOC coatings. The coatings included in this test program have VOC contents that range from less than 100 g/L to 340 g/L. This testing program is scheduled to conclude in 203

Harlan Associates Study: In February 1995, the ARB published the results of performance testing of architectural coatings by Harlan Associates, Inc. The purpose of the study was to determine the physical properties and performance of representative products in eight coating categories. A total of 110 coating products, purchased during late 1993 and throughout 1994, were tested in the following categories: industrial maintenance primers and topcoats, high-temperature industrial maintenance coatings, lacquers, varnishes, non-flats (including quick-dry

enamels), primer/sealers (including quick-dry primer/sealers), sanding sealers, and waterproofing sealers (wood and concrete).

While the raw data from this study was published in 1995, an analysis of the overall comparison of the coatings' test performance was not published. In developing the proposed SCM, ARB and district staffs analyzed and summarized the raw data. This performance study, although somewhat dated, is used to supplement the newer NTS study.

i. More Thickness

Project Specific Impacts: Industry has commented that, in order to meet the VOC limits proposed, manufacturers would need to reformulate many of their coatings to increase the amount of solids contained in those coatings. According to industry, this increase in solids content would lead to increased thickness of the low-VOC coatings being sprayed. Increased coating thickness would have two main effects. First, the coatings would become more difficult to handle during application due to increased viscosity. Secondly, a set amount of coating would cover less surface area, also due in part to increased viscosity. Industry contends that it is mainly high-solid, solvent-based alkyds, non-flats in particular, that will have this problem. During the review period of the ARB Draft PEIR for the architectural coatings SCM, ARB received comments from industry that ARB had misinterpreted earlier comments that addressed this issue. Industry stated that ARB had focused too narrowly on increased thickness as it applied to waterborne coatings, not high solid, solvent-based alkyds.

Analysis: ARB's response to these comments indicated that more attention was paid to waterborne coatings because waterborne coatings made up a very large percentage (95 percent) of non-flats. ARB also stated that there are a number of options manufacturers could choose which would allow them to reformulate coatings that would comply with the rule while not increasing solids. These include using exempt solvents, or moving to a water-based system. If a manufacturer does decide to reformulate a coating to increase solids content, less viscous resins exist which would allow compliant coatings to be manufactured while not increasing overall thickness. In evaluating product data sheets[14] from 500 different coatings and the results of its 1998 Architectural Coatings Survey, there was no apparent relationship between VOC content and the amount of solids that are present in the coating and no relationship between solids content and coverage. ARB also stated that an accurate way to determine whether low-VOC levels corresponded to increased solids and increased thickness was to see whether there had

[14] Product data sheets contain the coating performance specifications provided by coatings manufacturers to their customers. These specifications generally are based on laboratory tests performed by the manufacturers. Manufacturers usually use test methods approved by the American Society for Testing and Materials (ASTM). (Proposed Rule 74.2, Architectural Coatings, Section f.)

been an increase in overall sales over time. ARB found that coatings sales had remained constant on a per-capita basis over the last 12 years.

Conclusion: ARB's analysis of this issue in the PEIR is relevant to Ventura County. VCAPCD staff looked at this issue to see if there were any local issues that might alter ARB's conclusion and found that ARB's analysis is equally applicable to Ventura County. There is nothing to suggest that reformulated coatings that work in other parts of the state would not also work in Ventura County. Furthermore, according to test data accumulated by ARB, many water-based, compliant coatings are available. These coatings would not have the problem of increased thickness. Companies that do business in Ventura County also do business in other parts of the state, so there is no reason to believe that these coatings would not be available in Ventura County from the manufacturers of these coatings.

ii. Illegal Thinning

Project Specific Impacts: When commenting on ARB's Draft PEIR, industry also raised the issue of possible illegal thinning that would occur if the proposed VOC limits were adopted. The coatings affected by this are supposedly the same kinds of coatings that would be affected by the increased thickness problem discussed previously. According to industry, individual users will add illegal amounts of thinner to products that have been made more viscous due to increased solids content.

Industry also commented that the ARB field study on thinning was flawed due to inaccurate sampling where the focus was on higher-VOC specialty coatings that are less likely to be thinned.

Analysis: As stated in the discussion on increased thickness, the low-VOC coatings referenced by industry were found to exhibit similar thickness and coverage to higher VOC coatings when applied. ARB used product data sheets in part to determine the coverage exhibited by these products. These products should behave and perform in a manner that is consistent with what is described by their manufacturers. Also, these products should exhibit coverage qualities in Ventura County that are either identical or very similar to the qualities exhibited in any other part of the state. These would indicate that there would be no need for users to thin coatings in excess of legal limits.

Also, ARB has stated that its 1991 study focused on coatings that were found being used in the field and that users indicated had been thinned with VOC containing material.

Conclusion: The low-VOC coatings referred to by industry have been found to have coverage qualities similar to that of higher-VOC coatings; thinning to reduce viscosity should therefore not be an issue. ARB's analysis also concluded that thinning also inhibits hiding properties, increases drying time, and that when thinning occurred, the VOC limits were rarely exceeded.

Additionally, most of the products on the market are water-based. Because waterborne coatings are thinned with water, and are not usually thinned with solvent, low-VOC waterborne products would not be expected to result in illegal thinning.

iii. More Priming

Project Specific Impacts: Industry has commented that adopting the proposed VOC limits will lead to an increase in the amount of priming necessary to apply low-VOC water-based latex enamels. Industry contends that the increased priming would be necessary because the water-based latex enamels have poorer adhesion when being used to coat difficult substrates, and because the coatings have poor sealing and stain-blocking properties.

Analysis: The product data sheets that ARB used to make its determination of the performance capabilities of low-VOC coatings do not state that primers are recommended at all prior to application of latex enamel on an enamel surface. Also, the NTS study demonstrated that adhesion characteristics of low-VOC coatings are similar to conventional coatings. Also, data sheets for these products list, as some of their performance characteristics, "excellent adhesion to aged enamels."

Conclusion: Data sheets on latex enamel products reviewed by ARB do not substantiate industry's claims that primer would be necessary before applying these products. In fact, many products are marketed as having excellent adhesion properties. The NTS study showed adhesion characteristics similar to conventional coatings. Furthermore, no increase in primer sales has been demonstrated that corresponds with previous attempts to increase the stringency of VOC levels for architectural coatings. These facts contradict the suggestion that adopting the proposed VOC levels would lead to an increase in the use of primers. Finally, there is nothing in the relationship that would be different for Ventura County.

iv. More Topcoats

Project Specific Impacts: Industry has commented that they expect the proposed VOC reductions will result in an increased amount of topcoats. This is because industry contends that low-VOC products will not exhibit satisfactory coverage, build, or flow-and-level. Industry indicates that the problems that would lead to more topcoat use are mostly exhibited in water-based latex topcoats whereas ARB relied in part on studies that focused mostly on solvent-based products. Industry also stated that the NTS study used by ARB was flawed because test panels were coated by the draw down method that does not reflect real-world application, and because industrial maintenance topcoats were not subjected to real-world exposure levels for a sufficient amount of time. It should be noted that industry was represented on the NTS technical advisory committee that approved the testing protocol, including draw downs.

Analysis: ARB has noted that its data showed that water-based latex products did not demonstrate the deficiencies enumerated by industry. These products make up the majority of latex non-flats available on the market. The use of the draw down method to coat test panels was thought to be appropriate because this helps to standardize the application process. Industry was involved in a technical advisory committee for choosing test protocol. ARB also responded to industry by stating that tests represent a reasonable level of exposure, and that to subject coatings to all possible types of exposure would be an unrealistic undertaking. The length of exposure was not deemed to be an important factor for measuring characteristics such as coverage, flow-and-level, and build.

Conclusion: Tests done by the ARB evaluated a sample of products that reflect the type of coatings being manufactured and sold in California. An advisory committee that included many members of industry selected these coatings to be tested and the testing protocols. Since using consistent methods is important for conducting a fair test, using the draw down method of application is reasonable for coating test panels. Additionally, the time frame of the study is applicable for evaluating performance characteristics such as coverage, flow-and-level, and build. The tests upon which ARB relies for data are reasonable and do not indicate that more topcoat use will result from adopting the proposed VOC limits. VCAPCD staff looked at this issue to see if there were any local issues that might alter ARB's conclusion and found that ARB's analysis is equally applicable to Ventura County.

v. More Touch-Ups and Repair Work

Project Specific Impacts: Some coatings manufacturers and contractors claim that waterborne and low-VOC solvent-borne formulations do not dry as fast as conventional coatings and, therefore, are susceptible to damage such as sagging, wrinkling, alligatoring, or becoming scraped and scratched. Some industry representatives contend that low-VOC, acetone-borne lacquers, waterborne topcoats, and substitutes will require more touch-up repair work because longer drying times allow for the contamination of the coated surface with airborne dust and construction debris. Industry representatives also claim that high-solids, solvent-based alkyd enamels tend to yellow in dark areas, and that water-based coatings tend to blister or peel and result in severe blocking problems. Because of these problems discussed above, industry representatives claim that there will be a need to apply additional coatings.

Analysis: According to the product data sheets reviewed by ARB staff, the average drying time between coats for low-VOC coatings was similar or less than the average drying time for conventional coating in all categories except lacquers. Additionally, per capita coatings sale has not increased since 1988 which indicates that there is no increase in touch-up and repair due to the use of waterborne coatings. Also, the NTS study demonstrated that blocking characteristics of low-VOC coatings are similar to conventional coatings.

Conclusion: Based on the information presented by ARB staff, District staff does not anticipate that low-VOC coatings will require more touch-up and repair work. Additionally, industry's claims of adverse air quality impacts from more touch-up and repair work are unfounded. VCAPCD staff looked at this issue to see if there were any local issues that might alter ARB's conclusion and we found that ARB's analysis is equally applicable to Ventura County.

vi. More Frequent Re-coating

Project Specific Impacts: Some coating manufacturers and contractors assert that durability of compliant waterborne and low-VOC solvent-borne coatings are inferior to that of traditional solvent-borne coatings. They claim that the new coatings have many finish problems such as cracking, peeling, excessive chalking, color fading, and therefore, result in more frequent re-coating and consequently result in more VOC emissions than traditional coatings.

Analysis: The durability of a coating is affected by many factors, such as surface preparation, application method, environment (mechanical stress, thermal weathering), type of binder in the formulation, and the substrate coated. Results of the NTS study show that compliant coatings have similar performance and application characteristics as conventional coatings.

Conclusion: District staff concludes that low-VOC coatings are as durable and long lasting as conventional coatings. Advancements in coatings technology have resulted in improvement of the durability of new coatings. Therefore, claims of significant adverse air quality impacts from more frequent re-coating are unfounded. VCAPCD staff looked at this issue to see if there were any local issues that might alter ARB's conclusion and we found that ARB's analysis is equally applicable to Ventura County.

vii. Substitution

Project Specific Impacts: Some coating manufacturers and contractors assert that because waterborne and low-VOC solvent-borne coatings are inferior in durability and more difficult to apply than conventional coatings, consumers and contractors will substitute allegedly better performing, higher-VOC coatings from other categories for use in categories with low-VOC compliance limits (e.g., use of a rust preventive coating, which has a higher-VOC content limit requirement, in place of an industrial maintenance coating or nonflat coating).

Analysis: District staff concluded that widespread substitution not will occur as a result of adopting the proposed amendments for the following reasons:

1. The results from the NTS study show that low-VOC coatings with similar performance characteristics to conventional coatings are currently available.

2. The rule will not allow the application of certain coatings in specific settings (e.g., rust preventative coatings cannot be used in industrial settings.

3. The rule will require that when a coating can be used in more than one coating category, the lower limit of the two categories is applicable (except for specified categories).

Conclusion: There is no evidence that consumers and contractors will substitute higher-VOC coatings for low-VOC coatings. Low-VOC coatings with similar performance characteristics to conventional coatings are available on the market. VCAPCD staff looked at this issue to see if there were any local issues that might alter ARB's conclusion and we found that ARB's analysis is equally applicable to Ventura County. Therefore, manufacturers and contractors claims of significant adverse air quality impacts resulting from substitution are unfounded.

viii. More Reactivity

Project Specific Impacts: Some industry representatives claim that requiring manufacturers to reformulate to waterborne technology will lead to increases in ozone formation because the VOCs used in waterborne coatings are more reactive than those used in solvent-borne coatings. Industry also suggested that the VOCs used in architectural coatings, such as mineral spirits, have low reactivity, and thus does not contribute to ozone formation. Industry also suggested that NO_x control alone may be most appropriate for reducing ground level ozone. Industry representatives also claim that mass-based controls may not be effective and that reducing VOCs under certain conditions may actually lead to ozone nonattainment.

Analysis: Existing data do not support the claim that waterborne coatings are more reactive than solvent-borne. Using the Maximum Incremental Reactivity (MIR) scale as the basis for comparing reactivities of VOCs, it is true that, on a per gram basis, a typical VOC used in waterborne coatings, such as propylene glycol, is two to three times more reactive than a typical mineral spirit used in a solvent-based coating. However, when comparing the total, or weighted, reactivity of a product or product category (waterborne vs. solvent-borne), ARB staff found that solvent-borne coatings are over two times more reactive than waterborne coatings. In addition, the reactivity of propylene glycol is approximately three times less reactive (on a per gram basis) than that of other VOCs used extensively in solvent-borne coatings such as xylenes and toluene. Analysis also showed that the reactivity of some solvents used in waterborne coatings is similar to a typical mineral spirit used in solvent-borne coatings. The analysis is described in greater detail in ARB's PEIR for the architectural coatings SCM.

Industry's statement that VOC control causes more ozone has not been substantiated under real world atmospheric conditions. Certain atmospheric conditions characterized by very high VOC to NO_x ratios must exist in order for VOC control to exhibit an enhancing effect on ozone formation. These conditions are not likely to occur in urban areas.

Conclusion: The analysis performed by ARB staff of the available data indicates that there is no validity to the claim that waterborne coatings are more reactive than solvent-borne coatings. VCAPCD staff looked at this issue to see if there were any local issues that might alter ARB's conclusion and we found that ARB's analysis is equally applicable to Ventura County. The solvent-borne coatings are over two times as reactive than waterborne coatings. Therefore, the reformulation to waterborne coatings is likely to decrease ozone formation. The analysis also concluded that mass-based VOC regulations have been effective at reducing ground ozone level concentrations. Finally, there is nothing in the relationship that would be different for Ventura County.

ix. Synergistic Effects of the Eight Issues

Industry representatives have stated that the synergistic effect of the eight issues discussed above should be analyzed. Synergy occurs when two or more effects interact to produce a subsequent effect greater than the sum of the effects taken independently. The VCAPCD reviewed information submitted by industry as well as ARB staff analysis of NTS data and product data sheets. District staff concludes that low-VOC coatings have similar performance characteristics as conventional coatings. There is no evidence that a significant adverse air quality impact will result from the combined effect of two or more of the eight issues that is not evident in the effects analyzed of any singular issue.

b. Regulatory Issues

The estimated emissions from architectural coatings in Ventura County in 1996 were tons of VOC per day, based on a 1996 architectural coating survey conducted by the ARB.[15] The ARB survey indicated that approximately 100 tons of VOC per day were emitted from architectural coating operations statewide. This number was adjusted, based on a population factor, to determine Ventura County's contribution. The estimated emission reduction for the proposed rule amendments, when they become fully effective in 2004, is 15 percent, or 0.4 tons of VOC per day.

The proposed amendments to Rule 74.2 will result in an increase in the VOC limits for two coating categories – antenna coatings and temperature-indicator safety coatings. The ARB 1996 architectural coatings survey indicates that antenna coatings are not available to the general public, and that the use of antenna coatings results in emissions of less than 0.01 tons per day, statewide. The temperature-indicator safety coatings category is also very specialized, and applies only to coatings used on specific pieces of equipment in petroleum refineries. Currently, there is one petroleum refinery operating in Ventura County, and that facility does not have any equipment that requires temperature-indicator safety coatings. Therefore, the emission reductions that will be lost as a result of these VOC limit increases is considered negligible. In

[15] ARB Final Report – 1998 Architectural Coatings Survey Results, Published September 1999.

addition, District staff has determined that there currently are no complying coatings available on the market for these two coating categories.

The proposed rule includes a "product line averaging" compliance provision to provide flexibility for industry and to improve the cost-effectiveness of the rule (refer to section B.9. of the proposed rule amendments). Each of the VOC limits in the rule is feasible with or without an averaging provision, and the analysis for cost-effectiveness and feasibility contained in the staff report and EIR does not in any way depend on the existence of the averaging provision. The environmental analysis in the EIR is equally applicable to a rule that contains an averaging provision, as well as a rule that does not contain an averaging provision.

c. Cumulative Impacts

Based on the analyses and information presented in the PEIR, there is no evidence of any incremental adverse impacts to air quality from review of the nine industry concerns.

d. Mitigation Measures Required to Reduce Significant Impacts

Since the proposed project is not expected to result in significant adverse environmental impacts (project specific or cumulative) to the air quality of Ventura County, no mitigation measures are required.

B. Water

1. Environmental Setting

There are three local water sources in Ventura County; groundwater, surface water, and reclaimed water. The following information regarding Ventura County's water resources is summarized from the Ventura County General Plan.[16]

Groundwater is the single-most important source of water in the county. In 1985, it provided about 67 percent of the water utilized in the county. It is pumped extensively by individual well owners as well as purveyors who sell it at either retail sales to individuals or at wholesale to other purveyors. Since, overall, more groundwater is used than is replaced, the county's groundwater reserves are slowly decreasing (i.e., water is being extracted more rapidly than it is being replaced).

The largest groundwater supplies in the county are contained within major aquifers that underlie most of the Oxnard Plain, and the Las Posas and Santa Clara Valleys. These are, in order of

[16]Ventura County General Plan Goals, Policies and Programs, amended July 13, 1999.

increasing depth, the Oxnard, Mugu, Hueneme, Fox Canyon, and Grimes Canyon aquifer zones. Long-term overdrafting has caused serious seawater intrusion of the Oxnard aquifer. The efforts of the Fox Canyon Groundwater Management Agency (GMA) and United Water Conservation District (UWCD) have succeeded in managing seawater intrusion in the upper aquifer system (Oxnard and Mugu). However, the lower aquifer system (Hueneme, Fox Canyon, and Grimes) remains intruded by seawater.[17]

Surface water resources in Ventura County are divided into two major hydrologic units (Ventura River and Santa Clara-Calleguas Units) and into four other smaller hydrologic units (Rincon Creek, Cuyama, San Joaquin, and Malibu Hydrologic Units). Streams that generally flow for the entire year include Sespe Creek, Piru Creek, Reyes Creek, Matilija Creek, the North Fork of the Ventura River, the Ventura River below Foster Park, the upper portion of the Santa Clara River, and the Arroyo Simi.

The Casitas Municipal Water District provides wholesale and retail water distribution from Lake Casitas. The United Water Conservation District (UWCD) is responsible for groundwater recharge throughout most of the Santa Clara River Valley and for the wholesale distribution of water to purveyors on the Oxnard Plain. Lake Piru is UWCD's reservoir for water that is released into the Santa Clara River for subsequent recharge into the underground aquifers for later urban and agricultural use. The Calleguas Municipal Water District is responsible for providing imported water for wholesale purposes to retail water purveyors serving municipal/industrial customers in the southeastern portions of the county.

Groundwater quality in Ventura County is gradually being degraded, primarily by agricultural runoff and leachate. Improperly designed, installed, and maintained septic systems could potentially contaminate groundwater and surface water supplies, as well. Industrial and commercial developments on septic systems could potentially degrade groundwater supplies through discharges of hazardous wastes into these systems.

The best quality water is in portions of the Fox and Grimes Canyon aquifer zones, while the worst is in the upper aquifers along the edges of the Santa Clara Valley and in seawater intruded portions of the Oxnard aquifer zone. Water quality of the major reservoirs (Lake Casitas and Lake Piru) has remained constant and is generally of high quality. Surface water quality such as rivers and tributaries fluctuates from season to season, but is adequate in most areas for agricultural uses.

There are many agencies that are responsible for the management of water resources at the federal, state, and local levels. Federal agencies include the Forest Service, Army Corps of Engineers, Bureau of Reclamation, and the Environmental Protection Agency; state agencies

[17] Personal Communication, Lowell Preston, Manager - Ventura County Public Works Agency, Water Resources Division, June 2001.

include the Resources Agency and its many departments, the State Department of Public Health, Department of Water Resources, and the Water Resources Control Board; and local agencies include the County of Ventura Departments of Public Works, Environmental Health, Planning, Flood Control Districts, Sanitation Districts, Fox Canyon Groundwater Management Agency, cities, and water retailers and wholesalers.

ARB's statewide PEIR projected water supply and demand (in thousand acre-feet) in the year 2020 for the South Coast hydrologic region is presented in Table III-2 below:

Table III-2, Projected Water Supply and Demand: South Coast Hydrologic Region, 2020

Average Year			Drought Year		
Supply	**Demand**	**Shortage**	**Supply**	**Demand**	**Shortage**
5,994	5,993	0	6,090	6,090	0

Source: California Department of Water Resources

Flood control and storm drainage systems in Ventura County are managed by the Ventura County Flood Control District, along with various cities, drainage and storm drain districts, and Ventura County itself. There are a total of 486 miles of channels, ranging from fully improved concrete channels to unimproved natural channels, under the jurisdiction of the Flood Control District. The county is divided into four flood control zones as follows:

- Zone 1 – Ventura River Watershed
- Zone 2 – Santa Clara River Watershed
- Zone 3 – Calleguas Creek Watershed
- Zone 4 – Cuyama River Basin and the remainder of the county

In November 1990, the U.S. Environmental Protection Agency set forth regulations governing stormwater discharges under the National Pollutant Discharge Elimination System (NPDES) program. The purpose of the program is to establish a comprehensive stormwater quality program to manage urban stormwater, minimizing pollution of the environment to the maximum extent practicable. Agricultural runoff is not considered part of urban stormwater runoff.

The NPDES program is implemented in Ventura County through the Ventura County Stormwater Quality Management Plan (SMP). The Ventura County SMP represents and defines the requirements of the Ventura County NPDES Permit. This permit applies to Ventura County Flood Control District (VCFCD), the County of Ventura, and the cities of Camarillo, Fillmore, Moorpark, Ojai, Oxnard, Port Hueneme, Ventura, Santa Paula, Simi Valley, and Thousand Oaks. VCFCD is the Principal Co-permittee for permit implementation, while the remaining entities are designated as Co-permittees. As the Principal Co-permittee, VCFCD sets time schedules, prepares regulatory reports, and performs many of the organizational tasks required by the program. VCFCD also manages the countywide educational program and the countywide stormwater quality monitoring program. The current NPDES permit was adopted on July

27, 2000 by the California Regional Water Quality Control Board (RWQCB) and expires July 27, 2005.[18]

Wastewater in Ventura County is treated at various wastewater treatment plants (WWTPs), operated by a number of different entities. The Ventura County Public Works Agency, Water and Sanitation Services Division, operates WWTPs that serve the communities of Moorpark and Piru, as well as for the Todd Road Jail. The rest of the WWTPs in the county are operated by municipalities, such as the cities of Ventura, Oxnard, and Ojai, or other special districts that serve specific urban areas. The more rural/remote areas of the county rely on septic systems to process their wastewater.

2. Significance Criteria for Water Resources

Significant adverse environmental impacts to Ventura County's water resources could occur if the proposed project results in one of the criteria presented below. It should be noted that the list below includes only those impact areas that were selected as "PS" (potentially significant impact) in the Initial Study. Those impact areas that were selected as "N" (no impact) are not included in the list below.

i. Groundwater Quality
- Any land use proposal that will individually or cumulatively degrade the quality of groundwater and cause groundwater to fail to meet groundwater quality objectives set by the Los Angeles Regional Water Quality Control Board (LARWQCB) shall be considered to have a potentially significant impact.
- In cases where the proposed land use impact upon the quality of groundwater is unknown, and there is evidence that the proposed land use could cause the quality of groundwater to fail to meet the groundwater quality objectives set by the LARWQCB, the project shall be considered to have a potentially significant impact until such time as reliable studies determine otherwise.

ii. Surface Water Quality
- Any land use proposal that will degrade the quality of surface water and cause it to fail to meet surface water quality objectives for a hydrologic unit defined in the 4A, 3 or 5D Basin Plans is a significant adverse impact.
- In cases where the proposed land use impact upon the quality of surface water is unknown or the quality of surface water in a hydrologic unit is unknown, the impact is unknown and must be determined by additional investigation.

[18] Ventura Countywide Stormwater Quality Management Program Report, January 2001.

iii. Water Supply – Quality

The quality of domestic water available for development must be in compliance with the applicable State Drinking Water Standards as described in Title 22 of the California Code of Regulations, §64421 et seq. Note: Domestic water quality regulations for water systems with 15 or more service connections are enforced by the State Department of Health Services.

iv. Water Supply – Quantity

This item is either considered potentially significant or not significant based on whether the General Plan requirement is met. A source of water supplied by the following shall be determined to constitute a permanent supply of water: Casitas Municipal Water District; United Water Conservation District; cities, water companies, districts, mutuals, public sources – unless there is a special known adverse situation; groundwater in an area where it is certain that a properly designed and constructed well will produce a long term supply; and, wells that have successfully completed the Water Resource Division's pump test.

v. Sewage Collection/Treatment Facilities

Any project which would individually or cumulatively generate sewage effluent which would be discharged to and exceed the capacity of an existing sewer main or sewage treatment plant would have a potentially significant impact. If the project description includes improvements to existing, or construction of new, sewer mains and /or sewage treatment plants which would then be capable of serving the project and other cumulative development, there would be a less than significant impact. These improvements/new facilities, however, must also be assessed for possible impacts on other environmental issues.

3. Analysis of Potential Environmental Impacts

a. Water Quality

Potential impacts that might occur as a result of implementing the proposed rule include increased improper waste disposal. A significant impact could result if there were difficulties associated with waste disposal, however it is relatively easy for sources to safely dispose of waste generated from architectural coatings. As described in ARB's PEIR for the SCM, based on the South Coast Air Quality Management District's unannounced site visits conducted for its 1996 Rule 1113 amendments, the majority of contractors either dispose of the waste material properly or recycle the waste material.

As a result of implementing the Ventura County SMP, combined with efforts by the National Paint and Coatings Association, the amount of improper disposal of waste products associated with this rule are expected to decline. In addition, the trend in the paint and coatings industry is to replace more toxic solvents (such as toluene, xylenes, mineral spirits, and methyl ethyl ketone (MEK)) with less toxic and water-based solvents, resulting in less impact on the environment for any waste materials that are improperly disposed. ARB's staff report concludes that

manufacturers will be able to formulate coatings that will meet the proposed VOC limits without increasing the amount of toxic air contaminants (TACs). However, as a safety measure, the proposed rule institutes new annual reporting requirements for coatings containing perchloroethylene and/or methylene chloride. Results of the proposed annual reporting for these TACs will be used to evaluate the need for further toxic regulation.

Another potential concern is the impact of the waste materials associated with manufacture, use, and cleanup, that are properly disposed, and that flow to the wastewater treatment system. As Table IV-9 of ARB's PEIR indicates, the projected impact to publicly-owned treatment works (POTW) in Ventura County, under a worst-case scenario, is expected to be an increase of only 0.0020 percent in wastewater flow in 2010.

b. Water Demand

A projected increase in water demand as a result of the proposed project could occur based on the manufacturing, use, and cleanup of waterborne coatings. Based on ARB's worst-case scenario, water demand for the South Coast region could increase by 56,684 gallons per day in 2010. This translates to an increase of only 0.0011 percent for the entire South Coast region, which represents a negligible impact on water demand, even under the worst-case scenario. Ventura County's portion of this increase would be even less.

c. Conclusion

Significant groundwater and surface water quality impacts are not expected as a result of implementing the amendments to Rule 74.2 in Ventura County. Both the volume and toxicity of improperly disposed of waste products is expected to decline as a result of efforts by the paint and coatings industry and implementation of the Ventura County SMP. No additional stormwater drainage facilities are required as a result of the proposed project.

In addition, the increases in the wastewater flow to the wastewater treatment plants that are expected to occur as a result of the proposed project are negligible. No additional capacity in the wastewater treatment plants is necessary.

Finally, the increase in water demand resulting from the proposed project will be negligible and no additional water entitlements or resources are warranted.

4. Cumulative Impacts

There is no evidence of any adverse incremental effect on water quality. The negligible incremental increase in wastewater flow to the regional wastewater treatment plant as well as the negligible increase in water demand are not considered cumulatively considerable. Cumulative impacts are not considered significant.

5. Mitigation Measures Required to Reduce Significant Impacts

Since the proposed project is not expected to result in significant adverse environmental impacts to the water resources of Ventura County, no mitigation measures are required.

C. Public Services

1. Environmental Setting

Residents of Ventura County are provided with a number of essential public services. These services include fire protection, police protection, schools, water, and library services. The services are provided by either special districts, the cities within Ventura County, or, in the unincorporated areas, the County of Ventura itself. Public facilities in Ventura County that use architectural coatings for maintenance include schools, libraries, and various government buildings.

The county has twenty public school districts (K-12) with an overall enrollment approaching 130,000 students. The Ventura County Community College District operates three community colleges – Moorpark College, Oxnard College, and Ventura College. California State University Channel Islands, a four-year university, is located in the Camarillo area and began operating in the Fall of 1999. The county is served by four independent public library jurisdictions – the Ventura County Library Services Agency, the City of Oxnard, Santa Paula Public Library, and the City of Thousand Oaks. The Ventura County Library Services Agency operates sixteen community and special libraries.

Many parks and public areas exist in the county as well, and they are operated by a wide variety of agencies. At the federal level are the Los Padres National Forest, the Santa Monica Mountains National Recreation Area, and the Channel Islands National Park. State parks and open space lands are located along the coast within the Santa Monica Mountains area and inland at Hungry Valley State Recreation Area. The Casitas Municipal Water District and United Water Conservation District provide facilities at Lake Casitas and Lake Piru, respectively. At the local level, facilities are provided by the County of Ventura, the cities, and three recreation and park districts.

Fire protection is provided to residents of the county by several different fire protection entities. The Ventura County Fire Protection District operates thirty fire stations that serve the municipalities of Camarillo, Moorpark, Ojai, Port Hueneme, Simi Valley, and Thousand Oaks, and the unincorporated regions of the county. Besides fire fighting, the Ventura County Fire Protection District focuses on preventative measures and preparation for combating fires. Fire

prevention consists of making inspections and recommendations for fire safety, and enforcing the Uniform Fire Code.
The cities of Oxnard and Ventura have their own separate fire departments with stations located throughout each city. The cities of Fillmore and Santa Paula each have volunteer fire departments. The Los Padres National Forest area of the county is served by the U.S. Forest Service.

The Sheriff is the Chief Law Enforcement Officer for the County of Ventura and, as such, has jurisdiction over its unincorporated areas. The Ventura County Sheriff's Department also provides law enforcement services for the cities of Thousand Oaks, Camarillo, Ojai, Moorpark, and Fillmore. All other cities within the county provide their own law enforcement. The Sheriff's Department is headquartered in the City of Ventura and maintains stations in Camarillo, Fillmore, Lockwood Valley, Moorpark, Ojai, and Thousand Oaks, and East Valley (between Thousand Oaks and Simi Valley). Inmates in Ventura County are housed at three major facilities: the Pre-Trial Detention Facility at the Ventura County Government Center, the Todd Road jail near Santa Paula, and the Honor Farm in Ojai Valley.

2. Significance Criteria for Public Services

The significance criteria for public services in Ventura County, where a significant adverse effect would occur due to the proposed amendments to Rule 74.2, are presented below. It should be noted that the list below includes only those impact areas that were selected as "PS" (potentially significant impact) in the Initial Study. Those impact areas that were selected as "N" (no impact) are not included in the list below.

a. Fire Protection – Distance/Response Time

Project distance from a full time paid fire department is considered a significant impact if the project is in excess of five (5) miles, measured from the apron of the fire station to the structure or pad of the proposed structure. Fire sprinklers will mitigate the impact and will be required as per Ordinance 14. The response time required to service a proposed project is more difficult to forecast due to many variables (such as stop signs, grade, curves, road conditions, etc.). If it appears that a response time would be in excess of 12 minutes, it would signify a significant impact.

b. Public Services Facilities – Fire, Law Enforcement/Emergency Services, Education, Recreation

All public services facilities within Ventura County, including fire protection, law enforcement/emergency services, schools, libraries, and recreation facilities such as parks, require periodic maintenance and upkeep, which involves application of architectural coatings on a periodic basis. Although none of the Ventura County departments/agencies have determined

specific thresholds for this type of impact, this issue was evaluated. Impacts are discussed in relation to the amount of additional personnel, equipment, or materials that might be required due to a change in architectural coatings formulation. If the project results in a substantial amount of additional personnel, equipment, or materials to any of the above-mentioned public service facilities, the project are considered to have a significant adverse impact.

3. Analysis of Potential Environmental Impacts

a. Fire Protection – Distance/Response Time

The ARB PEIR concluded that the flammability classification (designated by the National Fire Protection Association) for acetone is the same order of magnitude as other solvents currently used in the formulation of architectural coatings, such as toluene, xylenes, and MEK. This flammability classification standard is used nationwide, and therefore is applicable in Ventura County. There is no reason to believe that there are any differences between Ventura County and the rest of the state that would increase the danger of acetone as a fire hazard. Directions for use and hazard warnings appear on coating cans in Ventura County just as they would throughout the state, so there is no increased risk of misuse that could contribute to an increased fire risk. The safety procedures for working with architectural coatings containing flammable substances such as acetone are within current working practices (e.g., apply only in adequately ventilated areas, eliminate any nearby ignition sources or hot surfaces, etc.). Since the ARB's analysis is applicable to Ventura County in all respects, there is no significant impact from fire hazard associated with the proposed VOC limits.

i. Project Impacts to Fire Protection in Ventura County

The flammability classification for acetone is the same order of magnitude as the solvents it would replace when formulating low-VOC coatings. Since there would be no increased risk of fire hazard due to increased use of acetone, there will be no significant impact to fire protection services in Ventura County, and no significance threshold will be exceeded.

ii. Cumulative Impacts

There is no evidence of any adverse incremental effect on fire protection services. Cumulative impacts are not considered significant.

iii. Mitigation Measures Required to Reduce Significant Impacts

Since there will be no increase in the amount of public services needed to provide fire protection, lowering the VOC limits for architectural coatings to the proposed limits will not exceed any significance threshold in place in Ventura County. Therefore, there is no significant impact to

fire protection services in Ventura County from the proposed amendments to architectural coatings VOC limits. No mitigation measures are required.

b. Additional Maintenance of Public Facilities

A potential significant impact could occur if local agencies were forced to use inferior coatings, which may lead to increased maintenance under the proposed rule. Industry has commented that the proposed VOC limits for coatings may cause local agencies to use coatings that are of an inferior quality or lack the durability of coatings that are currently used but would be exempt under the proposed amended rule. This could lead to an overall greater use of architectural coatings.

Data collected by the ARB shows that there are many coatings available in all coatings categories that will meet the VOC limits proposed, and that these coatings will perform at a level equal to that of coatings with higher VOC limits. In fact, these tests conclude that low-VOC coatings compare well with other coatings in all areas of performance. Furthermore, the product data sheets for low-VOC coatings list performance characteristics for these coatings that are similar to those of higher-VOC coatings. ARB also found that a fairly large percentage of the coatings marketed meet the proposed VOC limits.

Results of the NTS study showed that low-VOC coatings had durability qualities comparable to that of higher VOC products currently used. The tests also showed that waterborne coatings on the market had similar drying times to conventional coatings. Manufacturers that sell their products nationwide market the low-VOC coatings tested in these studies, so low-VOC coatings would be available in Ventura County.

i. Project Impacts to Maintenance of Public Facilities

Since low-VOC coatings perform well and would be readily available in Ventura County, there should be no increase in the amount of work needed to maintain public facilities. Also, the similarity in drying times means that facilities will not need to be painted or repainted predominantly during the warmer summer months. In keeping with the results of the independent tests, no adverse impacts due to increased maintenance of public facilities would result from lowering the VOC limits as proposed, and the significance criteria for public services will not be exceeded.

ii. Cumulative Impacts

There is no evidence of any adverse incremental effect on the maintenance of public facilities. Cumulative impacts are not considered significant.

iii. Mitigation Measures Needed

Since the significance criteria for public services in Ventura County will not be exceeded, no mitigation is required to reduce impacts.

D. Transportation/Circulation

1. Environmental Setting

Ventura County has a well-established and comprehensive transportation system to serve the diverse travel needs of the county. It includes federal and state highways, county roads, urban arterials, rural highways and streets, rail and bus transit services, freight rail, port facilities, and airports. Major pipelines within the county carry crude oil and natural gas, generally along highways and railroad lines. The transportation system and its current usage are heavily influenced by north-south travel along the California coast, and proximity to the Pacific Ocean and the Los Angeles metropolitan area.

2. Significance Criteria for Transportation

The project will be considered to have significant transportation/circulation impacts if any one of the criteria listed below is met. It should be noted that the list below includes only those impact areas that were selected as "PS" (potentially significant impact) in the Initial Study. Those impact areas that were selected as "N" (no impact) are not included in the list below:

a. Level of Service – Roadway Segments
   - Minimum Acceptable Level of Service (LOS): Minimum LOS for road segments within the Regional Road Network and the Local Road Network is shown in Table 1 on Page 140 of the Initial Study Assessment Guidelines.[19]
   - Project Specific Impacts: A significant adverse project specific traffic impact is assumed to occur on any road segment if any one of the following results from the project:
     i. If the project will add 10 or more peak hour trips (PHT) to a road segment that is currently operating at an acceptable LOS as defined in Table 1, but would cause the LOS to fall to an unacceptable level as defined in Table 1.
     ii. If the project will add one or more PHT to a roadway segment that is currently operating at less-than-acceptable LOS as defined in Table 1.
     iii. If the project will add 10 or more average daily trips (ADT) or 1 percent or more of the total projected ADT, whichever is greater, to a roadway that is currently operating at less-than-acceptable LOS as defined in Table 1.

[19]Ventura County Initial Study Assessment Guidelines, September 2000

- Cumulative Impacts: A significant adverse cumulative traffic impact is assumed to occur on any road segment if any one of the following results from the project:

  i. If the project will add one or more ADT to a roadway segment that is part of the regional road network and is projected to fall to a less-than-acceptable LOS as defined in Table 1 by the year 2020. However, if the project will increase the projected 2020 volume/capacity (V/C) ratio by less than 0.01 and the County's Traffic Impact fees are paid, the project's contribution to an otherwise significant cumulative impact is considered mitigated.

  ii. If the project will add 10 or more PHT to a roadway segment, which is part of the regional road network projected to operate at an acceptable LOS by the year 2020, but when considered with other approved proposed and reasonably foreseeable future projects, will cause the road segment to fall to a less-than-acceptable LOS as defined in Table 1.

  iii. If the project will add one or more AM southbound or PM northbound PHT to State Route 33 between the northerly end of the Ojai Freeway and the City of Ojai limits, the project is considered as contributing a significant cumulative impact on State Route 33.

b. Level of Service – Intersections

- Changes in Level of Service: Potentially significant changes in LOS at intersections on the Regional Road Network is shown in Table 2 on Page 141 of the Initial Study Assessment Guidelines.
- Project Specific Impacts: A significant adverse project specific traffic impact is assumed to occur at any intersection if the project will change the V/C ratio or add PHT to impacted intersections that exceed the thresholds established in Table 2.
- Cumulative Impacts: A significant adverse cumulative traffic impact is assumed to occur at any intersection if any one of the following results from the project:

  i. If the project will add one or more PHT to the critical movements at an intersection that is part of the regional road network and is projected to cause a LOS change greater than the thresholds defined in Table 1 by the year 2020. If the project will increase the projected 2020 V/C ratio by less than 0.01 and the County's Traffic Impact fees are paid, the project's contribution to an otherwise significant cumulative impact is considered mitigated.

  ii. If the project will add 10 or more PHT to an intersection which is on the regional road network projected to operate at an acceptable LOS by the year 2020, but when considered with other approved proposed and reasonably foreseeable future projects, will cause the V/C or trip thresholds in Table 2 to be exceeded.

3. Analysis of Potential Environmental Impacts

One area analyzed for potential transportation/circulation impacts was increased trips to landfills due to disposal of additional waste materials. This waste, it was proposed, would come from coatings and containers due to problematic performance characteristics, including shelf life, pot life, and freeze-thaw of certain low-VOC coatings. Comments were also received indicating that out-of-state manufacturers would have to ship coatings during the three non-winter seasons to avoid potential freezing en route. It was proposed that this would cause an increase in traffic during high ozone periods.

Data regarding freeze-thaw characteristics shows that manufacturers have indicated that addition of surfactants will improve freeze-thaw capabilities of waterborne coatings. The NTS study also showed that the compliant waterborne waterproofing wood sealers included in the study passed freeze-thaw stability tests. Based on this information, it is determined that there would be no significant increase in landfill trips as suggested by industry representatives.

Another comment stated that drying times would be longer for the low-VOC coatings. As a result, more trips would be required due to the additional days required to complete a project. Thus, additional commute trips would be generated. However, the NTS evaluation of coating products indicates that low-VOC coatings in all categories, except lacquers, have comparable drying times to conventional coatings. Thus additional commute trips would not be required for the workers applying the low-VOC coatings.

VCAPCD staff's final conclusion is that there will not be additional customer or heavy-duty truck traffic that would exceed the significance criteria.

4. Cumulative Impacts

There is no evidence of any adverse incremental effect on transportation or circulation in Ventura County. Cumulative impacts are not considered significant.

5. Mitigation Measures Required to Reduce Significant Impacts

VCAPCD staff looked at this issue and found that ARB's analysis is equally applicable to Ventura County. No significant adverse transportation/circulation impacts are anticipated from implementing Rule 74.2. None of the significance criteria listed above would be exceeded. Thus, there are no impacts that will require mitigation measures.

E. Solid Waste/Hazardous Waste

1. Environmental Setting

Ventura County currently has four facilities with full Solid Waste Disposal Permits (SWDPs) with no expiration date. Two of these are landfills - Simi Valley Landfill and Toland Road Landfill. Two of these facilities are material recycling and transfer stations – Del Norte Regional Recycling and Transfer Station in the City of Oxnard and Gold Coast Recycling, Inc. in the City of Ventura. Other active solid waste sites include composting facilities at the Ojai Sanitation District Wastewater Treatment Plant and at World Soils, in the unincorporated area near South Oxnard. There are several landfill sites in the county that have been closed. Most recently, Bailard Landfill in the unincorporated area near the City of Ventura closed in 1998.[20]

Coatings that have dried are disposed of as municipal solid waste. Coatings which have not dried (*i.e* disposed in liquid form) are treated has hazardous waste, and must be transported out of Ventura County to a Class I Landfill. However, the requirement of the California Integrated Waste Management Act of 1989, to reduce the waste stream to landfills by 50 percent in the year 2000, is expected to reduce the amount of hazardous waste disposed in landfills.

Additional information regarding hazardous waste, in the context that it may cause a threat to human health and safety, can be found in this document in Section III.F. – Hazards.

2. Significance Criteria for Solid Waste/Hazardous Waste

The proposed control measure would have significant adverse solid waste/hazardous waste impacts in Ventura County if the following criteria are met:

a. Solid Waste: Any project that generates solid waste will have an impact on the demand for solid waste disposal capacity in Ventura County. However, unless the County has reason to believe that there is less than 15 years of disposal capacity available for county disposal, no individual project would have a significant impact on the demand for solid waste disposal capacity. In addition, Ventura County Ordinance 4155 minimizes the potential solid waste disposal capacity impacts for any project by mandating the recycling of materials found on the "Director's List of Recyclables."

b. Hazardous Waste: The storage, handling and disposal of potentially hazardous waste shall be in conformance with the requirements set forth in the following regulations:
   - Enabling Legislation – CCR, Title 22, Division 4.5.
   - California HSC, Division 20, Chapter 6 5.

[20] Ventura County Integrated Waste Management Plan, Summary Plan, Final Draft, April 2000.

- Permit Requirements – Ventura County Ordinance Chapter 5 (Hazardous Substances), Article 1 (Certified Unified Program Agency).

The above State Legislation and local ordinances have been enacted for the purpose of preventing contamination from improper storage, handling and disposal of hazardous wastes. It is also the intent of these regulations to establish procedures so that the generators of hazardous wastes will be encouraged to employ reduction technology and destruction of their hazardous wastes prior to disposal. If potentially hazardous waste is not stored, handled and disposed of in conformance with the above regulations, the project will be considered to have a significant adverse impact.

3. Analysis of Potential Environmental Impacts

The potential environmental impacts for the proposed rule amendments deal mainly with the increased generation of solid waste/hazardous waste and its disposal. Comments received by ARB for the PEIR regarding this matter allege the following:

a. Compliant lower-VOC coatings targeted by the SCM will not have the same freeze-thaw capabilities as existing coatings, and therefore may "go bad" during transport from mild climates to extreme climates, resulting in that load being discarded into a landfill.

b. Compliant lower-VOC coatings targeted by the SCM will have shorter shelf lives, and therefore a percentage of the manufacturers' inventory will have to be landfilled because the coatings have "gone bad" in the can over time.

c. As a result of the lower-VOC content limits for industrial maintenance (IM) and floor coatings, manufacturers will formulate more two-component systems that may have, on average, a shorter pot life compared to conventional coatings. As a result, low-VOC coatings could solidify in the can during the application process, resulting in an unusable portion of coating that would need to be discarded into a landfill.

d. Because the proposed SCM will require the use of waterborne coating technologies, more surface preparation in the form of sandblasting will be required. This in turn will increase the amount of wastes deposited in landfills.

ARB's analysis demonstrated that even if some compliant coatings are landfilled due to freeze-thaw, shelf life, or pot-life problems, the total amount of solid waste and hazardous waste materials deposited in landfills will not create a significant solid waste or hazardous waste impact. For Ventura County, anticipated solid waste impacts associated with implementing the SCM are 0.007 percent of the total permitted throughput.[21] Since the entire permitted solid waste throughput per day for Ventura County is 3,000 tons, this 0.007 percent increase represents a

[21] ARB PEIR, Table IV-11.

countywide increase of approximately 0.2 tons per day of solid waste. The average capacity of a refuse truck in Ventura County is 9 tons.[22] A 0.2-ton increase would use approximately 2.2 percent of the capacity of one average refuse truck in the county per day. This increase will not pose a significant impact for waste disposal.

4. Cumulative Impacts

The negligible incremental increase anticipated in solid waste is not cumulatively significant. Cumulative impacts are not considered significant.

5. Mitigation Measures Required to Reduce Significant Impacts

VCAPCD staff looked at this issue to see if there were any local issues that might alter ARB's conclusion and found that ARB's analysis is equally applicable to Ventura County. This allows staff to make the following findings:

a. Implementation of the proposed rule amendments in Ventura County will not result in the generation and disposal of either nonhazardous or hazardous wastes that exceed the capacity of designated landfills. No mitigation measures are required.

b. The Ventura County Environmental Health Department, Solid Waste Management Department, California Integrated Waste Management Board, and the federal Environmental Protection Agency regulate disposal of solid waste/hazardous waste in Ventura County. Implementation of the proposed rule amendments will be subject to the rules and regulations of these agencies. No mitigation measures are required.

F. Hazards

1. Environmental Setting

Many potential hazards to human health and property exist within Ventura County associated with the storage, transport, and use of hazardous materials. Hazardous material is defined as any material that because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. Hazardous materials include hazardous substances, hazardous waste, and any material which a handler or administrative agency believes would be injurious to the health and safety of persons or harmful to the environment if released.

[22] Personal communication, Shelley Sussman, Ventura County Public Works Agency, Solid Waste Management Department, June 2001

Such material may be classified as poisons, corrosive chemicals, flammable materials, explosives, and oxidizers and reactive materials or substances.
The fire protection agencies within the county monitor activities that are considered to be potentially hazardous, and respond to emergency situations. There are ongoing programs for the investigation and alleviation of hazardous situations within the county. The Countywide Emergency Response Plan, which is continuously being updated, identifies specific actions to be taken and the resources available for the protection of public health and the environment in the event of accidental and/or illegal release of hazardous substances.

Proposition 65, approved by California voters in 1986, became operative January 1, 1987. It adds Section 25180.7 to the Health and Safety Code, and requires each designated employee to disclose to the Board of Supervisors and to the local Health Officer any illegal discharge or threatened illegal discharge of a hazardous waste within the county of which the employee obtains knowledge in the course of his or her employment and which the employee knows is likely to cause substantial injury to the public health or safety.

Architectural coating activities within Ventura County involve the storage, transport, and usage of numerous types of coating formulations, as well as thinning and clean-up solvents, some of which may be considered hazardous due to their chemical composition.

2. Significance Criteria for Hazards

The proposed rule amendments will be considered to have significant adverse hazard impacts in Ventura County if any one of the following criteria is exceeded:

a. Above-ground Hazardous Materials: Section 2.15 of the Ventura County General Plan covers goals and policies for hazardous materials and waste. Whether the hazardous material impacts of a project are significant shall be decided on a case-by-case basis and depends on:

   - Individual or cumulative physical hazard of material or materials.
   - Amounts of materials on-site, either in use or storage.
   - Proximity of hazardous materials to populated areas and compatibility of materials with neighboring facilities.
   - Federal, State, and local laws, and ordinances, governing storage and use of hazardous materials.
   - Potential for spill or release.
   - Proximity of hazardous materials to receiving waters or other significant environmental resource.

b. Public Health: Significance must be determined on a case by case basis and is related to project type, location and other environmental factors. If it is determined that project-related impacts are significant and can be mitigated through minor project redesign or adoption of standard conditions, then project specific mitigation shall be identified.

3. Analysis of Potential Environmental Impacts

a. Risk of Upset

As a result of being de-listed as a VOC by the U.S. EPA, the ARB, and the VCAPCD, acetone usage as a solvent has increased. Although acetone is expected to be used to reformulate some compliant coatings, the ARB indicates that it is unlikely that implementation of the proposed rule amendments will substantially increase the future use of acetone.

Increases in acetone usage may increase the number of trucks or rail cars that transport acetone in Ventura County, however individual trucks and rail cars are equipped to safely handle these coatings and will not be affected by the proposed rule amendments. The consequences (exposure) of an accidental release of acetone are directly proportional to the size of the individual transport trucks or rail cars, the release rate, and the amount released. While the probability of an accidental release of acetone in Ventura County could increase as a result of increased acetone transport, the severity of any one incident involving acetone transport will not change as a result of implementing the proposed rule amendments. Similarly, the severity of an accident involving the storage and transport of acetone is not expected to change from existing conditions.

With regard to other possible replacement solvents, the ARB indicates that the trend in coatings technology is to replace ethylene glycol monobutyl ether (EGBE) solvents with less toxic/less hazardous coalescing solvents such as Texanol and propylene glycol. Additionally, the ARB indicates that a majority of water-based formulations (flats and nonflats) do not contain solvents that are hazardous air pollutants (HAPs).

According to the ARB, some reformulated two-component industrial maintenance coating systems may contain diisocyanate compounds. While the use of diisocyanate compounds does not reflect the trend of using less hazardous compounds, there should be no significant increase in the risk of upset in Ventura County due to the increased use of these compounds. Like Texanol, PCBTF, propylene glycol, and ethylene glycol, diisocyanates are significantly less flammable than currently used, highly flammable conventional solvents. Therefore, any potential hazards created by the increased use of compliant coatings containing diisocyanates would be offset by the decreased use of more flammable solvents.

The ARB analysis has determined that manufacturers will be able to reformulate coatings in order to comply with the proposed VOC limits without increasing the use of toxic air contaminants. As a precautionary measure, however, the proposed amendments also require manufacturers to report sales/distribution information to ARB for the following categories: Clear Brushing Lacquers, Rust Preventative Coatings, Specialty Primers, Sealers, and Undercoaters, Recycled Coatings, Bituminous Roof Coatings, Bituminous Roof Primers, and all coatings

containing perchloroethylene and methylene chloride. This reporting will allow ARB to track the usage of products with higher VOC limits and track the usage of toxic compounds and is not expected to cause any significant adverse environmental impacts.

b. Human Health

Industry representatives have asserted that low-VOC compliant coatings will contain compounds that are more toxic than current formulations. For example, diisocyanates (HDI, MDI, and TDI) may be used more widely in two-component coating systems. In addition, exempt solvents such as acetone may be used as a replacement solvent for coatings such as lacquers, floor coatings, and waterproofing sealers.

The ARB PEIR evaluated potential human health impacts associated with the use of these replacement solvents. ARB staff used the Threshold Limit Values (TLVs) established by the American Conference of Governmental Industrial Hygiene (ACGIH), OSHA's Permissible Exposure Limits (PELs) and Short Term Exposure Limits (STELs), the Immediately Dangerous to Life and Health (IDLH) levels recommended by the National Institute for Occupational Safety and Health (NIOSH), and health hazards developed by the National Safety Council as measures of toxicity.

As illustrated in Table IV-13 of the ARB PEIR, some replacement solvents have higher or less severe TLVs, PELs, STELs, and IDLHs than conventional solvents. For example, acetone is considered less toxic than most of the listed conventional solvents. However, some replacement solvents, particularly the diisocyanate group of solvents, appear to have more severe toxicological effects than conventional solvents. The SCAQMD conducted a health risk assessment (HRA) for a number of these compounds to estimate the likelihood of an individual contracting cancer or experiencing other adverse health effects as a result of exposure to the compound(s). This HRA was used in the ARB PEIR to demonstrate the carcinogenic, chronic (non-carcinogenic), and acute effects of conventional solvents and replacement solvents used with architectural coatings (see Tables IV-13 through IV-16 of the ARB PEIR).

The ARB PEIR analysis concludes that significant adverse human health impacts [including carcinogenic, chronic (non-carcinogenic), and acute health effects] are not anticipated to occur as a result of replacement solvents being used due to implementation of the SCM statewide.

In addition, the PEIR addressed human health impacts that were alleged to occur due to an increase in sandblasting operations, which would result in increased human exposure to crystalline silica, a carcinogen. The PEIR analysis concludes that an increase in sandblasting activities is not anticipated as a result of implementation of the SCM. Moreover, California law regulates the practice of sandblasting. These regulations are intended to reduce the emission of fine particulate matter, as well as reduce public and worker exposure to these particles.

District staff has reviewed this information and have determined that these conclusions regarding human health impacts are also applicable to Ventura County. Therefore, significant adverse human health impacts are not anticipated to occur as a result of the proposed project.

4. Cumulative Impacts

There would be little or no incremental increase in hazards and would not be cumulatively considerable. Cumulative impacts are not considered significant.

5. Mitigation Measures Required to Reduce Significant Impacts

Potential hazard impacts in Ventura County, resulting from implementation of the proposed rule amendments, are not expected to be significant, as discussed above.

Since the proposed rule amendments will not pose a significant hazard increase to Ventura County residents, no mitigation measures are required.

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IV. Required CEQA Topics

This section presents the following topics that are required to be addressed in the EIR pursuant to CEQA and the CEQA Guidelines: Environmental Impacts Found Not to be Significant, Irreversible Environmental Changes, Potential Growth-Inducing Impacts, and Consistency with Other Plans. The conclusions presented in the following subsections regarding project impacts and consistency with other plans are based on, and consistent with, the ARB PEIR.

A. Environmental Impacts Found Not to be Significant

The following subsections discuss environmental impact areas that would not be significantly adversely affected by implementation of revised Rule 74.2. These impact areas were analyzed as part of the Initial Study process in order to focus the EIR only on those impact areas where there were potentially significant impacts.

1. General Plan Environmental Goals and Policies

The purpose of the proposed project is to help improve air quality in Ventura County. The proposed project is therefore consistent with the Environmental Goals and Policies contained in the Ventura County General Plan aimed at improving the county's air quality. No project or cumulative adverse impacts to the General Plan Environmental Goals and Policies are anticipated.

2. Land Use

The ARB PEIR determined that no significant land use impacts would occur, and the PEIR analysis is applicable to Ventura County. The proposed project will not result in the removal of existing housing, additional housing demand, new construction, or the addition of new equipment to existing facilities. Any new activity associated with the rule amendments will occur at existing facilities. Therefore, no project or cumulative impacts to community character, housing, or growth inducement are anticipated.

3. Water Resources – Groundwater and Surface Water Quantity

With respect to groundwater and surface water quantity, due to its nature, the proposed project will not cause any specific groundwater basins or surface water bodies to be overdrafted. This conclusion is consistent with the analysis in the ARB PEIR. Therefore, no project or cumulative impacts to groundwater and surface water quantity are anticipated. However, this EIR addresses impacts related to groundwater and surface water quality.

4. Mineral Resources

The PEIR analyzed this issue and determined that there would be no impacts to mineral resources statewide. The proposed amendments to Rule 74.2 are not anticipated to result in demand for additional mineral resources (aggregate or petroleum) in Ventura County, and are not anticipated to hamper/preclude any extraction processes or access to extraction activities. Therefore, no project or cumulative impacts to mineral resources are anticipated.

5. Biological Resources

The PEIR analyzed this issue and determined that there would be no impacts to biological resources statewide. The proposed amendments to Rule 74.2 will not cause impacts to sensitive habitats of plants or animals because all activities will typically occur at construction, industrial, or commercial sites already in operation. Due its nature, no new development is anticipated to occur as a result of the proposed project. Therefore, no project or cumulative impacts to biological resources are anticipated.

6. Agricultural Resources

Due to its nature, the proposed project will not generate or lead to new development. Therefore, the proposed project will not result in the direct or indirect loss of any agricultural soils. The rule amendments are also not expected to impact any groundwater or surface water that would otherwise be available for agriculture. In addition, due to its nature, the proposed project will not cause any changes in the air quality or microclimate at or near agricultural land, or cause an increase in or introduction of pests and/or disease in an agricultural area. The project does not involve or cause any non-agricultural land use or development. Therefore, no project or cumulative impacts to agricultural resources are anticipated. Potential impacts to groundwater and surface water quality in general are addressed in the Water section of this EIR.

7. Visual Resources

The PEIR determined that no significant impacts to aesthetics would occur on a statewide basis. The proposed project will not result in any new construction or the addition of any new equipment to existing facilities in Ventura County. Any new activity associated with the rule amendments will occur at existing facilities. No visual resources or public views will be degraded or obscured by the proposed project. Therefore, no project or cumulative impacts to visual resources are anticipated.

8. Paleontological Resources

Due to its nature, the proposed project will not result in any new construction. Therefore, the project will not impact fossil sites or cause increased access to fossil materials in Ventura County. Likewise, no project or cumulative impacts to paleontological resources are anticipated.

9. Cultural Resources

The PEIR determined that no significant impacts would occur to cultural resources. Due to its nature, the proposed rule amendments will not result in any new construction or demolition of existing structures. Therefore, no archaeological, historical, ethnic, social, or religious resources in Ventura County will be affected by these amendments. No project or cumulative impacts to cultural resources are anticipated.

10. Energy Resources

The PEIR determined that no significant impacts would occur to energy resources, including electricity, natural gas, and fossil fuels, statewide. Due to its nature, the project is not expected to increase the demand for or consumption of energy, in any form, in Ventura County. Therefore, no project or cumulative impacts to energy resources are anticipated.

11. Coastal Beaches & Sand Dunes

The PEIR determined that no significant impacts to geophysical formations would occur statewide. The proposed amendments to Rule 74.2 do not involve or cause any activities that would occur at or near coastal beaches and sand dunes, or that would alter the deposition or erosion rates at or near these areas. Therefore, no project or cumulative impacts to coastal beaches and sand dunes are anticipated.

12. Seismic Hazards

The PEIR determined that no significant geophysical impacts, including exposure of people or property to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or other natural hazards, would occur statewide. No construction is proposed, therefore no fault rupture, ground shaking, tsunami, seiche, or liquefaction hazards will be created within Ventura County. No project or cumulative impacts to seismic hazards are anticipated.

13. Geologic Hazards

The PEIR determined that no significant geophysical impacts, including exposure of people or property to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or other natural hazards, would occur statewide. No construction is proposed, therefore no subsidence,

expansive soils, or landslide/mudflow hazards will be created within Ventura County. No project or cumulative impacts to geologic hazards are anticipated.

14. Hydraulic Hazards

The PEIR determined that no significant geophysical impacts, including exposure of people or property to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or other natural hazards, would occur statewide. No construction is proposed as part of the project, therefore no erosion/siltation or flooding hazards will be created within Ventura County. No project or cumulative impacts to hydraulic hazards are anticipated.

15. Aviation Hazards

The proposed project does not involve any construction activities. Because the project does not involve any development of properties near airports, there will be no project or cumulative impacts to aviation hazards.

16. Fire Hazards

A fire hazard is defined as the potential loss of life and/or property due to fire. This section of the Environmental Checklist pertains specifically to fire hazards in the rural or wildland areas of Ventura County. Most of the architectural coatings activities that are subject to Rule 74.2 occur at existing industrial, commercial, and residential areas. The proposed project generally will not involve activities occurring in rural or wildland areas. Therefore, the project and cumulative impacts related to fire hazards are considered not significant. However, impacts related to aboveground hazardous materials and fire protection distance/response time are discussed in the Hazards section and Public Facilities section, respectively, of this EIR.

17. Hazardous Materials/Waste – Belowground Hazardous Materials

The proposed amendments to Rule 74.2 do not involve the storage of hazardous materials in underground piping or tanks. Therefore, impacts to belowground hazardous materials are not anticipated. However, impacts related to aboveground hazardous materials and hazardous waste are analyzed in the Hazards section and the Solid Waste/Hazardous Waste section, respectively, of this EIR.

18. Noise and Vibration

The PEIR determined that no significant noise impacts would occur statewide. The proposed rule amendments will not result in any new construction or the addition of any new equipment to existing facilities. Any new activity associated with the amendments will occur at existing facilities. Therefore, no project or cumulative impacts to noise and vibration are anticipated.

19. Glare

Due to its nature, the proposed project will not result in any new construction or the addition of any new equipment to existing facilities. Any new activity associated with the amendments will occur at existing facilities, and are not expected to generate additional light or glare. Therefore, no project or cumulative impacts to glare are anticipated.

20. Transportation/Circulation – Safety/Design, Tactical Access, Facilities and Services

Due to its nature, the proposed project is not expected to impact the safety and design or tactical access for public or private roads and highways, nor is it expected to impact pedestrian/bicycle facilities, off-street parking, bus transit services, railroads, airports, harbor facilities, or pipelines. However, potential impacts to transportation level-of-service are analyzed in the Transportation/Circulation section of this EIR.

21. Water Supply – Fire Flow

Due to its nature, the proposed project is not expected to impact water flow rates required at fire hydrants or at private water systems for the purpose of fire suppression. However, impacts to water supply quality and quantity are analyzed in the Water section of this EIR.

22. Waste Treatment/Disposal – Individual Disposal Systems and Solid Waste Facilities

Due to its nature, the rule amendments will not require the construction of any individual sewage disposal systems or additional solid waste facilities; therefore, no impacts are anticipated for these environmental impact areas. However, impacts to sewage collection/treatment facilities and to solid waste management are analyzed in the Water section and the Solid Waste/Hazardous Waste section, respectively, of this EIR.

23. Utilities

The PEIR determined that the architectural coatings suggested control measure would not cause additional demand for electricity or natural gas statewide. The proposed project is therefore not expected to generate additional demand for electricity or natural gas in Ventura County, nor are they expected to impact communication facilities. Moreover, no project or cumulative impacts to electric, natural gas, or communication utilities are anticipated.

24. Flood Control/Drainage

Due to its nature, the proposed project will not result in any new construction. Therefore, the project will not require the alteration or construction of any flood control or drainage facilities in

Ventura County. In addition, the project will not result in the deposition of sediment and debris material that would obstruct channel flows, nor will it cause increased runoff to channels. No project or cumulative impacts to flood control/drainage facilities are anticipated.

25. Law Enforcement/Emergency Services – Personnel/Equipment

Due to its nature, the proposed project will not result in any new construction. Therefore, no additional demand for law enforcement or emergency services will be created by the rule amendments. However, impacts related to the maintenance of public facilities are analyzed in the Public Services section of this EIR.

26. Recreation – Regional Trails/Corridors

Due to its nature, the proposed project will not result in any new construction. Therefore, the rule amendments will not create additional demand for recreation facilities, nor will they impede future development of recreation facilities. However, impacts related to the maintenance of public facilities, such as local and regional parks, are analyzed in the Public Services section of this EIR.

B. Irreversible Environmental Changes

CEQA Guidelines §15126(c) requires an environmental analysis to consider "any significant irreversible environmental changes which would be involved if the proposed action should be implemented." In particular, CEQA Guidelines §15126.2(c) indicates that "[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified."

The following impact areas have been evaluated in this EIR, as well as in the ARB PEIR: air quality, water, public services, transportation/circulation, solid waste/hazardous waste, and hazards. The analyses presented in this EIR and in the ARB PEIR concluded that no significant adverse project-specific or cumulative impacts would occur to any of these environmental areas. For example, the air quality impacts analysis included an evaluation of eight issues identified by industry regarding the potential air quality impacts of the project. After considering these issues, based on information in the PEIR, VCAPCD staff determined that the project would not have a significant effect on air quality. The analysis of water impacts indicated that an incremental increase in the amount of wastewater from cleaning coating equipment could occur but that this

increase would not be significant. The analysis of public services and transportation/circulation concluded that revised Rule 74.2 would not create any significant adverse impacts to these areas.

Likewise, the solid waste/hazardous waste analysis included an evaluation of the potential for an incremental increase in solid waste impacts resulting from some types of coatings that may have a shorter pot life or shorter shelf life, or may be less able to withstand freeze-thaw conditions than conventional coatings. A worst-case analysis was performed and it was determined that even if there were an incremental increase in solid waste impacts, this increase would not be significant. The analysis of hazard impacts indicated that future compliant low-VOC coatings could be formulated with hazardous materials. However, solvents used in low-VOC coatings are typically no more hazardous than solvents used in conventional coatings. Therefore, hazards impacts are considered insignificant. Further, because Industrial Maintenance coatings are typically applied in industrial settings where safety equipment, training, and procedures are in place, workplace exposures to potentially hazardous coatings would be minimal. In addition, because architectural coatings are applied on an as-needed basis, continuous exposures would not occur. As a result, no significant cancer or noncancer human health impacts are anticipated.

As indicated by the information and analyses presented in this EIR and in the ARB PEIR, the proposed project would not result in irreversible environmental changes or the irretrievable commitment of resources.

C. Potential Growth-Inducing Impacts

CEQA Guidelines §15126(d) requires an environmental analysis to consider the "growth-inducing impact of the proposed action." CEQA Guidelines §15126.2(d) states that the EIR shall "[d]iscuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment."

As explained in the Land Use, Cultural Resources, and other impact areas discussed in Section (A.) above, implementing revised Rule 74.2 primarily affects existing coatings formulation companies and will not, by itself, have any direct or indirect growth-inducing impacts on Ventura County businesses because it would not foster economic or population growth or the construction of additional housing, new infrastructure, or new public services.

D. Consistency With Other Plans

CEQA Guidelines §15125(d) states that "[t]he EIR shall discuss any inconsistencies between the proposed project and applicable general plans and regional plans. Such regional plans include, but are not limited to, the applicable air quality attainment or maintenance plan or State Implementation Plan, areawide waste treatment and water quality control plans, regional transportation plans, regional housing allocation plans, habitat conservation plans, natural

community conservation plans and regional land use plans for the protection of the Coastal Zone, Lake Tahoe Basin, San Francisco Bay, and Santa Monica Mountains." The following is a brief discussion of how revised Rule 74.2 is consistent with these plans.

1. Consistency with State Implementation Plan

Since the proposed amendments to VCAPCD Rule 74.2 will result in a net benefit to air quality in Ventura County, the project is consistent with the State Implementation Plan (SIP). The adoption of the SCM implements Control Measure R-303 in the Ventura County Air Quality Management Plan (AQMP), which is consistent with the SIP.

2. Consistency with District Plans under the California Clean Air Act

Since it has been determined that the proposed amendments to VCAPCD Rule 74.2 will result in a net benefit to air quality in Ventura County, the project is consistent with the California Clean Air Act. The architectural coatings rule is included in the District's AQMP, with the goal of attaining the state ambient air quality standard for ozone.

3. Consistency with Area-Wide Waste Treatment and Water Quality Control Plans

Revised Rule 74.2 is consistent with area-wide waste treatment and water quality control plans because implementation of the revised rule will not significantly affect the ability of Publicly Owned Treatment Works (POTW's) within the project area to treat and handle wastewater.

4. Consistency with Regional Transportation Plans

Revised Rule 74.2 is consistent with the Southern California Association of Governments (SCAG) 2001 Regional Transportation Plan and 2000 Regional Transportation Improvement Program since no significant adverse impact to transportation/circulation will result from the additional regulation of architectural coatings within the project area. While industry has asserted that some traffic and congestion may be generated from the disposal of small quantities of architectural coatings due to shelf life, pot-life, and freeze-thaw problems, any such effects would be negligible and would not create significant adverse impacts to transportation/circulation. Furthermore, since compliant low-VOC coatings have performance characteristics that are comparable to their higher-VOC counterparts, additional trips are not expected to result over and above current trips associated with conventional coatings.

5. Consistency with Regional Housing Allocation Plans

As explained earlier, implementation of revised Rule 74.2 will not create or cause the need for additional housing in the project area. Furthermore, the revised rule will not affect how housing is planned or allocated within the project area. Therefore, the revised rule is considered to be

consistent with the Population and Housing Section of the Land Use Chapter and Appendix of the Ventura County General Plan.

6. Consistency with Habitat Conservation Plans

Implementation of revised Rule 74.2 will not create or cause impacts to sensitive habitats of plants or animals because all activities will typically occur at construction, industrial, or commercial sites already in operation. No new development that could potentially adversely affect plant and animal life is anticipated. Therefore, the revised rule is considered to be consistent with the Open Space/Conservation Element of the Ventura County General Plan.

7. Consistency with Natural Community Conservation Plans

As explained earlier, implementation of revised Rule 74.2 will not create impacts to cultural resources within the project area. Should archaeological resources be found during the application of architectural coatings to newly constructed structures or existing structures, the application of such coatings would cease until a thorough archaeological assessment was conducted. Furthermore, in most cases, the application of architectural coatings would occur after construction where archaeological resources would already have been disturbed. Therefore, the revised rule is considered to be consistent with natural community conservation plans in the project area.

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V. Project Alternatives

A. Introduction

CEQA requires a description of a range of reasonable alternatives to the project that would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and an evaluation of the comparative merits of the alternatives. CEQA also requires consideration of a reasonable range of potentially feasible alternatives; it does not require consideration of alternatives that are not reasonable. The discussion and analyses of project alternatives presented below is based on and consistent with the analyses of project alternatives in the ARB PEIR.

B. Alternatives Rejected as Infeasible

The ARB PEIR examined seven alternatives that were found to be infeasible. Following is a brief description of these alternatives, and a discussion of why these alternatives were found to be infeasible for the project area (Ventura County).

1. Performance-Based Standards

Rather than establish lower VOC content requirements for specified categories of coatings, this alternative would establish emission standards based on performance standards such as "emissions per area covered" or "coating durability." This alternative has been rejected as infeasible because it would be too difficult to reach a consensus among involved parties as to how to create the standards to cover the multitude of coatings reformulations with varying performance characteristics.

2. Seasonal Regulation

Under this alternative, the VOC content limits proposed for various coatings in Rule 74.2 would be in effect during the "high ozone season" (typically the summer months). During the "low ozone season" (typically the winter months), coatings formulators could sell and distribute, and contractors and do-it-yourself consumers could use, coatings with higher VOC contents. This alternative was found infeasible for the project area because it is too difficult to implement and enforce. It would be difficult for coatings formulators, distributors, and retail stores to manage their inventories to ensure that only complying coatings are sold during the high ozone season. Knowledge of and enforcement of these requirements at the end-user level would be difficult and would require significant additional enforcement resources. In addition, there have been state violations ("high ozone") in all months of the year except February and December, based on data from 1980-1995.

3. Regional Regulation

Under this alternative, areas within the District that do not have an ozone problem or contribute to the District's ozone problem would be exempted from the VOC requirements of Rule 74.2. This alternative was rejected as infeasible for two main reasons. First, in order to determine the viability of such an approach, the District would have to conduct an extensive analysis involving ambient air quality modeling to determine which geographical areas would be subject to the lower VOC requirements and which would be exempted. This type of analysis would be difficult to complete due to the inherent variability of meteorological conditions within Ventura County. Different meteorological scenarios would drastically alter the determination of those geographical areas. In addition, there have been state ozone violations throughout the area.

Second, even if a reliable technical determination could be made regarding the geographical areas, the problem of enforcing this regulatory approach remains. Enforcement at the retail level, as well as the end-user level would be difficult and would require significant additional enforcement resources, as identified in the "Seasonal Regulation" alternative.

4. Exceedance Fees

This alternative would allow purchases of non-compliant coatings on payment of a fee, similar to the system that exists in the national Architectural and Industrial Maintenance (AIM) coatings rule. The system used in the national AIM rule allows coatings manufacturers and importers to sell coatings that exceed the applicable VOC limit if they pay a fee of $0.0028 per gram of excess VOC. Essentially, this is a "pay-to-pollute" approach. VCAPCD does not support such an approach because it does nothing to bring the air into compliance with state standards, and may actually hinder efforts to attain both the state and federal ozone standards. This type of approach could eliminate or substantially reduce the emission reductions expected from the proposed revisions to Rule 74.2. Additional problems include concern regarding whether the fee is high enough to discourage the manufacture and sale of high-VOC coatings, enforcement at the district-wide level, and extensive record keeping requirements. For all of these reasons, an exceedance fee approach is not considered a feasible alternative.

5. Tonnage Exemption

As with the "Exceedance Fees" alternative, this type of alternative is part of the national AIM coatings rule. A tonnage exemption would allow coatings manufacturers and importers to sell limited quantities of coatings that exceed the applicable VOC limit in Rule 74.2, without paying an "exceedance fee." The calculation would be based on the total mass of VOC contained in all exempt coatings. The limit of the exemption, on a "per manufacturer" or "per importer" basis, would be on a sliding scale that would decrease in future years.

Like the "Exceedance Fee" approach, a tonnage exemption would do nothing to bring the air into compliance with state standards, and may actually hinder efforts to attain both the state and federal ozone standards, and could substantially reduce the emission reductions expected from the proposed revisions to Rule 74.2. Additional problems include enforcement, recordkeeping, and reporting requirements. For these reasons, a tonnage exemption is not considered a feasible alternative.

6. Low Vapor Pressure (Low Volatility) Exemption

Under this alternative, VOCs with low vapor pressures (i.e., "low vapor pressure VOCs" or "LVP-VOCs") would be exempted as VOCs in determining the overall VOC content of a coating. This type of exemption is based on an assumption that low vapor pressure VOCs volatilize more slowly, and as a result emit less VOCs to the atmosphere and contribute very little to ozone formation in the atmosphere. The ARB PEIR identified a number of reasons why this alternative should be rejected as infeasible. Due to the extensive and technical nature of the reasoning behind this determination, the reasons have not been fully summarized in this report. For an extensive explanation of the ARB's determination of infeasibility, the reader should reference the ARB PEIR, Pages V-142 to V-151.

For the same reasons identified in the ARB PEIR, staff has concluded that this alternative is not feasible. The reasons are summarized as follows: exempting LVP-VOCs would not achieve regulatory consistency, LVP-VOCs in architectural coatings will eventually evaporate and enter the atmosphere, and EPA's Test Method 24 automatically excludes VOCs that do not evaporate into the atmosphere.

7. Reactivity-Based VOC Limits

This alternative would involve establishing coating VOC limits based on the reactivity characteristics (i.e., the tendency to react in the atmosphere to form ozone) of the compounds contained in the coating, instead of the mass-based VOC limits that are used in the proposed revisions to Rule 74.2 Historically in the State of California and in Ventura County in particular, control of VOC emissions has been through mass-based reductions. The ARB has committed to evaluating the feasibility of reactivity-based regulations for certain VOC source categories, and a number of specific studies relating to VOC photochemical activity are listed on Pages V-152 and V-153 of the ARB PEIR. In addition, ARB has begun to incorporate reactivity characteristics of compounds into some of their existing and proposed regulations. However, at this time, a number of issues need to be addressed before this type of control strategy could be developed for architectural coatings. These issues are described in the ARB PEIR (Pages V-155 to V-158). As discussed in the PEIR, additional data are necessary before assessing the feasibility of a reactivity-based control strategy for architectural coatings. Because additional reductions are needed in the near-term, and historical data indicate mass-based controls

effectively reduce ozone formation, it is necessary to proceed with mass-based VOC limits at this time.

C. Description of Alternatives Considered Feasible

The ARB PEIR included an evaluation of four alternatives. The fourth alternative analyzed in the ARB PEIR, Alternative D – Product Line Averaging, was included in the SCM adopted by the ARB, and also is included in the proposed Rule 74.2 analyzed in this EIR. The three remaining alternatives discussed in the ARB PEIR were also considered feasible for the project area, and are briefly described below:

1. Alternative A - No Project

This alternative assumes that the proposed revisions to Rule 74.2 will not be implemented, and that the existing VOC limits in Rule 74.2 would continue to apply. As a result, VOC emissions from architectural coatings within the project area would likely remain at the same level or may increase, if the volume of architectural coatings used in the project area increased.

2. Alternative B - Extended Compliance Deadlines

This alternative would extend all of the effective dates for the VOC content limits to January 1, 2004. The VOC content limits for affected coatings would be identical to those in the current version of the proposed revisions to Rule 74.2.

3. Alternative C - Further Reduction of VOC Content Limits

This alternative would further reduce the VOC content limits for affected coatings categories (adoption of the "final" limits as described in Table 1 of Appendix C of the NOP/IS for the ARB SCM EIR; see Appendix B of the ARB PEIR). The other proposed changes in the current proposed version of Rule 74.2 would be maintained.

D. Comparison of Alternatives

The ARB PEIR included an impact assessment of project level and cumulative impacts for air quality, water supply, water quality, public services, transportation/circulation, solid waste/hazardous waste, and human health for the proposed SCM. There were no significant impacts identified for these resource areas for the proposed SCM.

Impacts of resource areas specific to Ventura County also were found not to have significant adverse project level or cumulative impacts, as documented in Section III of this EIR. However,

a brief discussion of the potential environmental impacts that may be generated by each project alternative, as applicable to VCAPCD proposed Rule 74.2, is provided below:

1. Air Quality

Alternative A, the No Project alternative, assumes that the proposed revisions to Rule 74.2 will not be implemented, and that the VOC limits in the current Rule 74.2 will remain in effect. As a result, approximately 0.4 tons per day of VOC emission reductions from architectural coatings would not be achieved throughout the project area. This scenario would potentially jeopardize the ability of the VCAPCD to attain and maintain the state and federal ozone standards.

Alternative B, Extended Compliance Deadlines, would extend the VOC content limits to January 1, 2004. This alternative would ultimately achieve the same VOC emission reductions as the SCM, however the reductions would be achieved one year later.

Alternative C, Further Reduction of VOC Content Limits, would implement lower VOC content limits than those included in the proposed revisions to Rule 74.2. This alternative would further aid the VCAPCD's efforts to meet and maintain the state and federal ozone standards.

2. Water

a. Water Demand

For Alternative A, water demand impacts associated with the use of current coatings would remain constant. This alternative would have fewer water demand impacts compared to the proposed project.

For Alternative B, the affected coatings categories will be reformulated with the same waterborne technology, as they would be for the proposed project to meet the VOC content limits. Therefore, this alternative would result in similar insignificant water demand impacts as the proposed project, but the impacts would occur one year later.

For Alternative C, the final lower VOC content limits associated with this alternative may require increased use of waterborne technology. However, the worst-case scenario analyzed in this EIR and the ARB PEIR, that all affected coatings would be reformulated using waterborne technology, showed that water demand impacts were insignificant for the proposed project. Therefore, Alternative C would result in similar insignificant water demand impacts.

b. Water Quality

Alternative A would result in no change in the current quantities of coatings entering the sewer systems, storm drainage systems, or groundwater within Ventura County. Therefore, Alternative

A would not create any new or additional water quality impacts.

For Alternative B, the affected coatings categories will be reformulated with the same waterborne technology, as they would be for the proposed project to meet the VOC content limits. Therefore, this alternative would result in similar insignificant water quality impacts as the proposed project, but the impacts would occur one year later.

For Alternative C, the final lower VOC content limits associated with this alternative may require increased use of waterborne technology. However, the worst-case scenario analyzed in this EIR and the ARB PEIR, that all affected coatings would be reformulated using waterborne technology, showed that water quality impacts were insignificant for the proposed project. Therefore, Alternative C would result in similar insignificant water quality impacts.

3. Public Services

a. Public Facility Maintenance

Alternative A would not require any change to coatings application practices done for maintenance purposes at public facilities. Thus, Alternative A would not create any new or additional public facility maintenance impacts.

For Alternative B, the affected coatings categories will be reformulated with the same waterborne technology, as they would be for the proposed project to meet the VOC content limits. Therefore, this alternative would result in similar insignificant public facility maintenance impacts as the proposed project, but the impacts would occur one year later.

For Alternative C, end-users would eventually be required to use coatings with a lower VOC content than those do in the proposed project. However, based on the SCAQMD's technology assessment for Rule 1113 (SCAQMD, 1999), these lower VOC coatings perform as well as higher VOC coatings. Therefore, Alternative C would result in similar insignificant public facility maintenance impacts as the proposed project.

b. Fire Protection

Alternative A will not change the current impacts on fire departments. This alternative would mean the continued use of coatings subject to the current Rule 74.2. Therefore, Alternative A would not create any new or additional fire department impacts.

For Alternative B, it is expected that some resin manufacturers and coatings formulators will use waterborne technology containing less flammable solvents. The exception to this would be the use of acetone in some specific coating categories. However, fire departments treat all NFPA 3 flammable liquids the same. Because the same replacement and coalescing solvents used to meet

the proposed project VOC content limits would be used to meet the Alternative B VOC content limits, this alternative would result in similar insignificant impacts to fire departments as the proposed project, but the impacts would occur one year later.

For Alternative C, the final VOC content limits may require the increased use of waterborne technology. Manufacturers would be required to reformulate all solvent-borne coatings containing more flammable solvents with waterborne technology containing less flammable solvents. Therefore, Alternative C would result in fewer fire department impacts than would be expected with the proposed project.

4. Transportation/Circulation

Alternative A would not result in changes to the volume of traffic or traffic circulation patterns associated with the manufacturing, distribution, and use of architectural coatings. Thus, Alternative A would not create any new or additional transportation/circulation impacts.

For Alternative B, it is expected that the same replacement and coalescing solvents used to meet the proposed project VOC content limits would be used to meet the Alternative B VOC content limits. Thus, any additional trips associated with the potential disposal of reformulated low-VOC waterborne coatings due to freeze-thaw, shelf life, or pot-life problems would be the same as for the proposed project. Therefore, Alternative B would result in similar insignificant transportation/circulation impacts as the proposed project, but the impacts would occur one year later.

For Alternative C, the final VOC content limits may require the increased use of waterborne technology. Thus, any additional trips associated with the disposal of reformulated low-VOC waterborne coatings due to freeze-thaw, shelf life, or pot-life problems could potentially be greater than for the proposed project. However, the worst-case scenario analyzed in this EIR and in the ARB PEIR, that all affected coatings would be reformulated using waterborne technology, showed that transportation/circulation impacts were insignificant. Therefore, Alternative C would result in similar insignificant transportation/circulation impacts to those associated with the proposed project.

5. Solid Waste/Hazardous Waste

Alternative A would not require any changes to existing coatings manufacturing processes or coatings application practices. The volume of solid waste/hazardous waste generated from the manufacturing, distribution, and use of architectural coatings would not change under this alternative. Thus, Alternative A would not create any new or additional solid waste/hazardous waste impacts.

For Alternative B, it is expected that the volume of solid waste/hazardous waste generated from

the manufacturing, distribution, and use of architectural coatings would be identical to that generated by the proposed project. Therefore, Alternative B would result in similar insignificant solid waste/hazardous waste impacts as the proposed project, but the impacts would occur one year later.

For Alternative C, the final VOC content limits may require the increased use of waterborne technology. Thus, there could be potential additional coatings landfilled as a result of freeze-thaw, shelf life, or pot-life problems associated with the use of reformulated low-VOC waterborne coatings. However, the worst-case scenario analyzed in this EIR and in the ARB PEIR, that all affected coatings would be reformulated using waterborne technology, found that solid waste/hazardous waste impacts were insignificant. Therefore, Alternative C would result in insignificant solid waste/hazardous waste impacts, similar to those associated with the proposed project.

6. Hazards

a. Risk of Upset

Alternative A will not change the current risk of upset impacts associated with the manufacture, distribution, and use of architectural coatings. Therefore, Alternative A would not create any additional risk of upset impacts.

For Alternative B, it is expected that some resin manufacturers and coatings formulators will use waterborne technology containing less flammable solvents. The exception to this would be the use of acetone in some specific coating categories. However, as mentioned above, fire departments treat all NFPA 3 flammable liquids the same. For some coatings categories, more toxic but less flammable solvents may be used to meet the VOC limits in the proposed project. The use of these solvents, when balanced against the use of more flammable but less toxic conventional solvents would result in similar insignificant risk of upset impacts as the proposed project. The same replacement and coalescing solvents used to meet the proposed project VOC content limits would be used to meet the Alternative B VOC content limits. Therefore, this alternative would result in similar insignificant risk of upset impacts as the proposed project, but the impacts would occur one year later.

For Alternative C, the final VOC content limits may require the increased use of waterborne technology. In the context of flat, nonflat, and rust preventative coatings, resin manufacturers and coatings formulators would be replacing current coalescing solvents with less toxic and less flammable solvents in their waterborne formulations. Conversely, in the context of IM coatings, coatings formulators would be incrementally increasing the use of two-component polyurethane waterborne systems containing toxic solvents. Therefore, when balancing the loss of solvents that are more toxic and more flammable against the incremental increase in the use of certain coatings containing more toxic solvents, Alternative C would result in similar insignificant risk

of upset impacts as the proposed project.

b. Human Health

Under Alternative A, the current Rule 74.2 would continue to apply to the project area. This would mean that the same coatings used for Rule 74.2 compliance would likely be used in the future Thus, Alternative A would not create any additional human health impacts.

For Alternative B, it is anticipated that the same replacement and coalescing solvents used to meet the proposed project VOC content limits would be used to meet the Alternative B VOC content limits. However, in the context of the complaint two-component, waterborne IM systems containing some toxic compounds, since formulators have additional time to develop coatings, they may be able to formulate systems containing less toxic compounds or develop better application techniques to further reduce human exposure to these compounds. Therefore, Alternative B would result in slightly fewer human health impacts as compared to the insignificant health impacts of the proposed project.

For Alternative C, the final VOC content limits may require the increased use of waterborne technology. In the context of flat, nonflat, and rust preventative coatings, resin manufacturers and coatings formulators would be replacing current coalescing solvents with less toxic and less flammable solvents in their waterborne formulations. Conversely, in the context of IM coatings, coatings formulators would be incrementally increasing the use of two-component polyurethane waterborne systems containing toxic solvents. Therefore, when balancing the loss of solvents that are more toxic and more flammable against the incremental increase in the use of certain coatings containing more toxic solvents, Alternative C would result in similar insignificant human health impacts as the proposed project.

E. Conclusion

Pursuant to CEQA Guidelines §15126.6 (d), a matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. Table V-4 (page V-172) in the ARB PEIR lists the alternatives considered by District staff and how they compare to the SCM. Table V-5 (page V-173) of the ARB PEIR presents a matrix that lists the significant adverse impacts as well as the cumulative impacts associated with the proposed project and the project alternatives for all the environmental topics analyzed. The table also ranks each impact section as to whether the proposed project or a project alternative would result in greater or lesser impacts relative to one another.
Pursuant to CEQA Guidelines §15126.6(e)(2), if the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. Since the No Project alternative (Alternative A) would not achieve the long-term air quality benefits (e.g., VOC reductions) of the proposed revisions to Rule 74.2,

and needed by the District to achieve the mandated state and federal ozone standards, it is not the environmentally superior alternative.

Following is a brief explanation of why the District staff is recommending the proposed project, the proposed revisions to Rule 74.2, for adoption, instead of Alternatives A, B, or C.

Alternative A (No Project) is not supported by District staff because it would result in fewer emission reductions than the proposed project and the District needs the emissions reductions the proposed project will provide to achieve the state and federal ozone standards.

Alternative B (Extended Compliance Deadlines) is not supported by District staff because the VOC limits in the proposed rule are feasible by January 1, 2003 (January 1, 2004 for IM coatings), and it is not necessary to allow additional time to comply. Both the federal and California Clean Air Acts mandate that air quality standards be attained as expeditiously as practicable, and the District's air quality problems required that any delay in achieving emission reductions must be technically or economically justified. Based on all the information received by District staff to date, such a delay is not warranted.

Alternative C (Further Reduction of VOC Content Limits) is not recommended by District staff due to the need to focus limited staff resources on the technical, environmental, and economic issues associated with adoption of the interim limits, which are more readily achievable than the final limits.

Based on the information and analyses in this EIR and the ARB PEIR, District staff has concluded that the proposed revisions to Rule 74.2 are necessary and the best alternative for the District to achieve the further VOC reductions needed to attain the state and federal ozone standards. Moreover, if the District does not adopt the proposed revisions to Rule 74.2, the District will have to find other emission sources from which to obtain the necessary VOC emission reductions.

VI. Organizations and Persons Consulted

A. Agencies, Organizations and Individuals Consulted

It should be noted that staff of the VCAPCD has enjoyed a long history of involvement in the development of the SCM through the California Air Pollution Control Officers Association (CAPCOA) Architectural Coatings Working Group. Below is a list of agencies, organizations, and individuals consulted specifically for the preparation of this EIR developed for the adoption of our local rule.

1. California Air Resources Board (ARB)
2. California Air Pollution Control Officers Association (CAPCOA)
3. Mike Jaczola, ARB
4. Scott Johnson, VCAPCD
5. Genie McGaugh, VCAPCD
6. Ben Cacatian, VCAPCD
7. Shelley Sussman, Ventura County Public Works Agency (PWA) – Solid Waste Management Department
8. Vicki Musgrove, Ventura County PWA – Flood Control Department
9. John Crowley, Ventura County PWA – Water and Sanitation Services Division
10. Lowell Preston, Ventura County PWA – Water Resources Division

B. Persons Preparing the EIR

1. Stan Cowen, VCAPCD
2. Chuck Thomas, VCAPCD
3. Molly Pearson, VCAPCD
4. Elaine Searcy, VCAPCD

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RULE 74.2 - ARCHITECTURAL COATINGS

(Adopted 6/19/79, Revised 12/2/80, 9/21/82, 11/22/83, 10/21/86, 4/2/91, 8/11/92, 11/13/2001, 01/12/2010 xx/xx/2020)

A. Applicability

Except as provided in Subsection F.1, this rule is applicable to any person who markets, supplies, sells, offers for sale, or manufactures, blends, or repackages any architectural coating for use within the District, as well as any person who applies or solicits the application of any architectural coating within the District.

B. Requirements

1. VOC Content Limits: Except as provided in Subsections B.2 and B.3, no person shall: (i) manufacture, blend, or repackage for sale within the District; (ii) supply, sell, market, or offer for sale within the District; or (iii) solicit for application or apply within the District, any architectural coating with a VOC content in excess of the corresponding limit specified in the following Table~~s~~. Limits are expressed as VOC Regulatory (unless otherwise specified) thinned to the manufacturer's maximum recommendation, excluding colorant added to the tint bases. "Manufacturer's maximum recommendation" means the maximum recommendation for thinning that is indicated on the label or lid of the coating container.

~~Table 1 (Table 1 shall be effective until January 1, 2011)~~

~~COATING CATEGORY~~	~~LIMIT EFFECTIVE 1/1/2004 (grams per liter)[1,2]~~
~~Flat Coatings~~	~~100~~
~~Nonflat Coatings~~	~~150~~
~~Nonflat High Gloss~~	~~250~~
~~SPECIALTY COATINGS~~	~~(Alphabetized)~~
~~Antenna Coatings~~	~~530~~
~~Antifouling~~	~~400~~
~~Bituminous Roof~~	~~300~~
~~Bituminous Roof Primer~~	~~350~~
~~Bond Breaker~~	~~350~~
~~Clear Wood Coatings~~	
~~Clear Brushing Lacquer~~	~~680~~
~~Lacquers (including lacquer sanding sealers)~~	~~550~~

~~[1]The specified limits remain in effect unless revised limits are listed in subsequent columns in Tables 1 or 2.~~
~~[2] Conversion factor: one pound VOC per gallon (U.S.) = 119.95 grams VOC per liter.~~

Table 1 (Table 1 shall be effective until January 1, 2011)

COATING CATEGORY	LIMIT EFFECTIVE 1/1/2004 (grams per liter)[3,4]
Sanding Sealers (other than lacquer sanding sealers)	350
Varnishes	350
Concrete Curing Compounds	350
Dry Fog Coatings	400
Faux Finishing Coatings	350
Fire Resistive Coatings	350
Fire Retardant – Clear	650
Fire Retardant – Opaque	350
Floor Coatings	250
Flow Coatings	420
Form-Release Compounds	250
Graphic Arts-Sign Paints	500
High Temperature Coatings	420
Industrial Maintenance	250
Low Solids Coatings[5]	120
Magnesite Cement Coatings	450
Mastic Texture Coatings	300
Metallic Pigmented Coatings	500
Multi-Color Coatings	250
Pretreatment Wash Primers	420
Primers, Sealer & Undercoaters	200
Quick-Dry Enamels	250
Quick-Dry Primers, Sealers	200
Recycled Coatings	250
Roof Coatings	250
Rust Preventative Coatings	400
Shellacs – Clear	730
Shellacs – Opaque	550
Specialty Primers, Sealers and Undercoaters	350
Stains	250
Swimming Pool Coatings	340
Swimming Pool Repair and Maintenance Coatings	340
Temperature-Indicator Safety Coatings	550
Traffic Marking Coatings	150
Waterproofing Sealers	250
Waterproofing Concrete/Masonry Sealers	400
Wood Preservatives	350

[3] The specified limits remain in effect unless revised limits are listed in subsequent columns in Tables 1 or 2.
[4] Conversion factor: one pound VOC per gallon (U.S.) = 119.95 grams VOC per liter.
[5] Limit is expressed as VOC Actual.

Table 1-Coating VOC Content Limits[6]2 ~~(Becomes effective on January 1, 2011)~~

COATING CATEGORY	CURRENT LIMIT(g/l) ~~EFFECTIVE 1/1/2011~~	LIMIT (g/l) EFFECTIVE 1/1/20~~12~~21
Default		50
Flat Coatings	50	
Nonflat Coatings	100	50
Nonflat – High Gloss Coatings	150	50
Specialty Coatings		
~~Aluminum Roof~~	~~400~~	
Basement Specialty Coatings	400	
Bituminous Roof Coatings	50	
Bituminous Roof Primers	350	
Bond Breakers	350	
Building Envelope Coating		50
Concrete Curing Compounds	350	
Concrete/Masonry Sealers	100	
Driveway Sealer	50	
Dry Fog Coatings	150	50
Faux Finishing Coatings	350	
Fire Resistive Coatings	350	150
Floor Coatings	100	50
Form-Release Compounds	250	100
Graphic Arts Coatings (Sign Paints)	500	
High Temperature Coatings	420	
Industrial Maintenance Coatings	250	
Low Solids Coatings*	120	
Magnesite Cement Coatings	450	
Mastic Texture Coatings	100	
Metallic Pigmented Coatings	500	
Multi-Color Coatings	250	
Pre-Treatment Wash Primers	420	
Primers, Sealers, and Undercoaters	100	
Reactive Penetrating Sealer	350	
Recycled Coatings	250	
Roof Coatings	50	
Roof Coatings, Aluminum	400	100
Rust Preventative Coatings	250	
Shellacs: Clear	730	
Shellacs: Opaque	550	
~~Specialty Primers, Sealers & Undercoaters~~	~~350~~	
Stains: Exterior/Dual Stains Interior Stains	250	 100 250
Stone Consolidants	450	

[6] The specified existing limits remain in effect unless revised limits are listed in a subsequent column.

* Limit is expressed as VOC Actual.

COATING CATEGORY	CURRENT LIMIT(g/l)	LIMIT (g/l)
	~~EFFECTIVE 1/1/2011~~	EFFECTIVE 1/1/20~~12~~21
Swimming Pool Coatings	340	
Tile and Stone Sealers		100
Traffic Marking Coatings	100	
Tub and Tile Refinish Coatings	420	
Waterproofing Membranes	250	100
Wood Coatings	275	
Wood Preservatives	350	
Zinc-Rich Primer	340	

~~2. Most Restrictive VOC Limits: Effective Until January 1, 2011, if anywhere on the container of any architectural coating, or any label or sticker affixed to the container, or in any sales, advertising or technical literature supplied by a manufacturer or anyone acting on their behalf, any representation is made that indicates that the coating meets the definition of or is recommended for use for more than one of the coating categories listed in the Table 1, then the lowest (most restrictive) VOC standard shall apply. This provision does not apply to any of the following coating categories:~~

~~a. Lacquer coatings (including lacquer sanding sealers).~~
~~b. Metallic pigmented coatings.~~
~~c. Shellacs.~~
~~d. Fire-retardant coatings.~~
~~e. Pretreatment wash primers.~~
~~f. Industrial maintenance coatings.~~
~~g. Low-solids coatings.~~
~~h. Wood preservatives.~~
~~i. High temperature coatings.~~
~~j. Temperature-indicator safety coatings.~~

~~Antenna coatings.~~
~~Antifouling coatings.~~
~~Flow coatings.~~
~~Bituminous roof primers.~~
~~Specialty primers, sealers and undercoaters.~~
~~Basement specialty coatings~~
~~Reactive penetrating sealers~~
~~Stone consolidants~~
~~Tub and tile refinish coatings~~

2. Coating Categorization and Most Restrictive VOC Limits:
~~Effective January 1, 2011, i~~If a coating meets the definition in Section J for one or more specialty coating categories that are listed in ~~the~~ Table~~s~~ 1 in Subsection B.1, then that coating is not required to meet the VOC limits for Flat, Nonflat, or Nonflat – High Gloss coatings, but is required to meet the VOC limit for the applicable specialty coating listed in Table ~~2~~1.

~~Effective January 1, 2011, with the e~~Except ~~ion of~~for the specialty coating categories specified below, if a coating is recommended for use in more than one of the specialty coating categories listed in Table ~~2~~1, the most restrictive or lowest VOC content limit shall apply. This requirement applies to: usage recommendations that appear anywhere on the

coating container or label, or in any sales, advertising, or technical literature supplied by or available from a manufacturer, their website, or anyone acting on their behalf.

a. Aluminum roof coatings
b. Basement specialty coatings
c. Bituminous roof primers
d. High temperature coatings
e. Industrial maintenance coatings
f. Low-solids coatings
g. Metallic pigmented coatings
h. Pretreatment wash primers
i. Reactive penetrating sealers
j. Shellacs
~~k. Specialty primers, sealers, and undercoaters~~
kl. Stone consolidants
l~~m~~. Tub and tile refinish coatings
m~~n~~. Wood coatings
n~~o~~. Wood preservatives
o~~p~~. Zinc-rich primers

3. a. Sell-Through of Coatings: A coating manufactured prior to the effective date specified for that coating in Table ~~2~~1 in Subsection B.1, and that complied with the standards in effect at the time the coating was manufactured, may be sold, supplied, or offered for sale for up to three years after the specified effective date (excluding any coating subject to Current Limits). In addition, such coating may be applied at any time, both before and after the specified effective date. This Section B.3.a does not apply to any coating or colorant that does not display the date or date-code required by Subsection C.1.

b. Sell-Through of Colorants: A colorant manufactured prior to the effective date specified for that colorant in Table 2 in Subsection B.6, and that complied with the standards in effect at the time the colorant was manufactured, may be sold, supplied, or offered for sale for up to three years after the specified effective date (excluding any colorant subject to Current Limits). In addition, such colorant may be applied at any time, both before and after the specified effective date. This Section B.3.b does not apply to any coating or colorant that does not display the date or date-code required by Subsection C.1.

4. Painting Practices: All architectural coating containers used to apply the contents therein to a surface directly from the container by pouring, siphoning, brushing, rolling, padding, ragging or other means, shall be closed when not in use. These architectural coating containers include, but are not limited to, drums, buckets, cans, pails, trays or other application containers. Containers of any VOC-containing materials used for thinning and cleanup shall also be closed when not in use.

5. Thinning: No person who applies or solicits the application of any architectural coating shall apply or solicit the application of any coating that is thinned to exceed the applicable VOC limit specified in ~~the~~ Table~~s~~ 1 in Subsection B.1.

6. ~~Rust Preventative Coatings: Effective until January 1, 2012, no person shall apply or solicit the application of any rust preventative coating for industrial use, unless such coating~~

~~complies with the industrial maintenance VOC limit specified in Subsection B.1.~~Colorants: Effective January 1, 2021, no person within the District shall, at the point of sale of any architectural coatings subject to the VOC coating limits in Subsection B.1, add to such coating any colorant that contains VOC in excess of the corresponding applicable VOC limit specified in the following Table 2. Colorant added at the factory or at the worksite is not subject to the VOC limit in Table 2.

TABLE 2: VOC LIMITS FOR COLORANTS
Grams of VOC per liter of Colorant
Less Water and Less Exempt Compounds

COLORANT ADDED TO	VOC LIMIT
Architectural Coating excluding Industrial Maintenance (IM) Coating	50
Solvent-Based IM Coating	600
Waterborne IM Coating	50
Wood Coating	600

7. Coatings Not Listed in ~~the~~ Table~~s~~1 in Subsection B.1: For any coating that does not meet any of the definitions for the specialty coatings categories listed in ~~the~~ Table ~~s~~1 in Subsection B.1, the default VOC content limit shall apply.~~be determined by classifying the coating as a flat coating, a nonflat coating, or a nonflat high gloss coating, based on its gloss, as defined in Subsections J.21, J.33, and J.34; and the corresponding flat, nonflat, or nonflat high gloss coating VOC limit shall apply.~~

8. ~~Lacquers: Effective until January 1, 2011, notwithstanding the requirements of Subsections B.1 and B.5, a person or facility may add up to 10 percent VOC, by volume, to a lacquer to avoid blushing of the finish during days with relative humidity greater than 70 percent and temperature below 65 °F, at the time of application, provided that the coating contains acetone and is no more than 550 grams of VOC per liter of coating, less exempt compounds, prior to the addition of VOC.~~
Industrial Maintenance Coatings: No person shall apply or solicit the application within the District of any industrial maintenance coatings, except non-sacrificial anti-graffiti coatings, for residential use, or for use in areas such as office space and meeting rooms of industrial, commercial or institutional facilities not exposed to such extreme environmental conditions described in the definition of industrial maintenance coatings.

9. A manufacturer, distributor, or seller of a coating that meets the requirements of this rule including container labeling requirements, shall not be liable for noncompliant use unless the manufacturer, distributor, or seller advertises, markets, recommends or specifies the use of that coating in a noncompliant manner, or sells the coating to customers located in the District if such sale is prohibited by the requirements of this rule.

10. Manufacturers of recycled coatings shall certify their status in writing, and this certification shall be made available to District staff upon request.

C. Container Labeling Requirements

Each manufacturer of any architectural coating subject to this rule shall display the information listed below on the coating container (or label) in which the coating is sold or distributed:

1. Date Code: The date the coating was manufactured, or a date code representing the date, shall be indicated on the label, lid or bottom of the container. If the manufacturer uses a date code for any coating, the manufacturer shall file an explanation of each code with the

Executive Officer of the California Air Resources Board or with the Air Pollution Control Officer.

2. Thinning Recommendations: A statement of the manufacturer's recommendation regarding thinning of the coating shall be indicated on the label or lid of the container. This does not apply to the thinning of architectural coatings with water. If thinning of the coating prior to use is not necessary, the recommendation shall specify that the coating is to be applied without thinning.

3. VOC Content: Each container of any coating subject to this rule shall display one of the following values in grams of VOC per liter of coating:
   a. Maximum VOC content as determined from all potential product formulations; or
   b. VOC content as determined from actual formulation data; or
   c. VOC content as determined using the test methods in Subsection G.1.

   If the manufacturer does not recommend thinning, the container must display the VOC content, as supplied. If the manufacturer recommends thinning, the container must display the VOC content, including the maximum amount of thinning solvent recommended by the manufacturer.

   ~~Effective January 1, 2011, I~~if the coating is a multi-component product, the container must display the VOC content as mixed or catalyzed. If the coating contains silanes, siloxanes, or other ingredients that generate ethanol or other VOCs during the curing process, the VOC content must include the VOCs emitted during curing. VOC content shall be determined as defined in ~~Subsections J.61, J.62, or J.63~~Section J.

4. Industrial Maintenance Coatings**:** The labels of all Industrial Maintenance coatings shall prominently display the statement "For industrial use only" or "For professional use only" or "Not for residential use" or "Not intended for residential use."

~~5. Clear Brushing Lacquers: Until January 1, 2011, the labels of all clear brushing lacquers shall prominently display the statements "For brush application only." and "This product must not be thinned or sprayed."~~

~~6~~5. Rust Preventative Coatings: The labels of all rust preventative coatings shall prominently display the statement "For Metal Substrates Only."

~~7. Specialty Primers, Sealers and Undercoaters: Until January 1, 2012, the labels of all specialty primers, sealers and undercoaters shall prominently display one or more of the following descriptions:~~
~~a. For fire-damaged substrates.~~
~~b. For smoke-damaged substrates.~~
~~c. For water-damaged substrates.~~

~~8. Quick Dry Enamels: Until January 1, 2011, the labels of all quick dry enamels shall prominently display the words "Quick Dry" and the dry hard time.~~

~~9. Nonflat High Gloss Coatings: The labels of all nonflat high gloss coatings shall prominently display the words "High Gloss."~~

~~10~~6. Stone Consolidants: ~~Effective January 1, 2011, t~~The labels for all stone consolidants shall display the statement: "Stone Consolidants – For Professional Use Only."

~~11~~7. Wood Coatings: ~~Effective January 1, 2011, t~~The labels of all Wood coatings shall prominently display the statement: "For Wood Substrates Only."

~~12~~8. Zinc-Rich Primers: ~~Effective January 1, 2011, t~~The labels of all Zinc-Rich primers shall prominently display the statement: "For professional use only" or "For industrial use only" or "Not for residential use" or "Not intended for residential use."

~~13~~9. Faux Finishing Coatings: ~~Effective January 1, 2011, t~~The labels of all clear topcoat Faux Finishing coatings shall prominently display the statement: "This product can only be sold or used as part of a Faux Finishing coating system."

~~14~~10. Reactive Penetrating Sealers: ~~Effective January 1, 2011, a~~All Reactive Penetrating Sealers shall prominently display the label, "Reactive Penetrating Sealer."

11. Effective January 1, 2021, each manufacturer of any colorant subject to this rule shall display the information listed below on the container (or label) in which the colorant is sold or distributed.

a **Date Code:** The date the colorant was manufactured, or a date code representing the date, shall be indicated on the label, lid, or bottom of the container. If the manufacturer uses a date code for any colorant, the manufacturer shall file an explanation of each code with the APCO.

b. **VOC Content:** Each container of any colorant subject to this rule shall display one of the following values in grams of VOC per liter of colorant:

1) Maximum VOC Content as determined from all product formulations; or
2) VOC Content as determined from actual formulation data; or
3) VOC Content as determined using the test methods in Section G.

If the colorant contains silanes, siloxanes, or other ingredients that generate ethanol or other VOCs during the curing process, the VOC content must include the VOCs emitted during curing.

D. Calculation of VOC Content: For the purpose of determining compliance with the VOC content limits in Subsection B.1 or B.6, the VOC content of a coating or colorant shall be determined as defined in ~~Subsections J.61, J.62, or J.63~~ Section J. The VOC content of low solids coatings shall be determined in accordance with S~~ubs~~ection J.~~61~~. The VOC content of a tint base shall be determined without colorant that is added after the tint base is manufactured. If the manufacturer does not recommend thinning, the VOC content shall be calculated for the product as supplied. If the manufacturer recommends thinning, the VOC content shall be calculated including the maximum amount of thinning solvent recommended by the manufacturer. If the coating is a multi-component product, the VOC content shall be calculated as mixed or catalyzed. If the coating contains silanes, siloxanes, or other ingredients that generate ethanol or other VOCs during the curing process, the VOC content shall include the VOCs emitted during curing.

E. Reporting Requirements

1. Sales Data: A responsible official from each manufacturer shall upon request of the Executive Officer of the Air Resources Board, or his or her delegate, provide data concerning the distribution and sales of architectural coatings. The responsible official shall within 180 days provide information, including but not limited to:
   a. Name and mailing address of the manufacturer;
   b. Name, address, and telephone number of a contact person;
   c. Name of the coating product as it appears on the label and the applicable coating category;
   d. Whether the product is marketed for interior or exterior or both;
   e. Number of gallons sold in California in containers greater than one liter (1.057 quart) and equal to or less than one liter (1.057 quart);
   f. VOC Actual content and VOC Regulatory content in grams per liter. If thinning is recommended, list the VOC Actual content and VOC Regulatory content after maximum recommended thinning. If containers less than one liter have a different VOC content than containers greater than one liter, list separately. If the coating is a multi-component product, provide the VOC content as mixed or catalyzed.
   g. Names and CAS numbers of the VOC constituents in the product;
   h. Names and CAS numbers of any exempt organic compounds in the product;
   i. Whether the product is marketed as solventborne, waterborne or 100 percent solids;
   j. Description of resin or binder in the product;
   k. Whether the coating is a single-component or multi-component product;
   l. Density of the product in pounds per gallon;
   m. Percent by weight of: solids, all volatile materials, water, and any exempt organic compounds;
   n. Percent by volume of: solids, water, and any exempt organic compounds.

2. All sales data listed above in Subsection E.1 shall be maintained by the responsible official for a minimum of three years. Sales data submitted by the responsible official to the Executive Officer of the ARB may be claimed as confidential, and such information shall be handled in accordance with the procedures specified in Title 17, CCR Sections 91000-91022.

F. Exemptions

1. This rule shall not apply to:
   a. Any architectural coating that is supplied, sold, offered for sale or manufactured for use outside of the District or for shipment to other manufacturers for reformulation or repackaging;

   b. Any aerosol coating product.

   c. Any facility which applies coatings to test specimens for purposes of research and development of those coatings.

2. Except for the reporting requirements in Section E, this rule shall not apply to any architectural coating that is sold in a container with a volume of one liter (1.057 quart) or less, provided the coating containers are not bundled together to be sold as a unit that exceeds one liter (1.057 quart), and provided the label or product literature does not suggest combining multiple containers so that the combination does not exceed one liter (1.057 quart). This restriction against bundling small containers shall not apply to small container

kits where each container in the kit is a separate and unique product, and it shall not apply to containers packed together for shipping to a retail outlet.

3. Colorant added at the factory or at the worksite is not subject to the VOC limits in Table 2. In addition, containers of colorant sold at the point of sale for use in the field or on a job site are also not subject to the VOC limits in Table 2.

~~3. Limited Exemption, Early Compliance: Prior to January 1, 2011, any coating that meets the definition in Section J for a coating category listed in Subsection B.1 (Table 2) and complies with the corresponding VOC limit in Table 2 and with the Most Restrictive VOC limit in Subsection B.2 and the corresponding Labeling Requirement in Section C, if applicable, shall be considered in compliance with this rule.~~

G. Testing Procedures:

1. Volatile Organic Compound Content: To determine the physical properties of a coating in order to perform the calculations in Section J.67~~61~~ or J.69~~63~~, the reference method for VOC content is EPA Method 24, incorporated by reference in Subsection G.4.i, or South Coast AQMD Method 313 "Determination of VOC by Gas Chromatography-Mass Spectrometry" or ASTM Test Method 6886 "Standard Test Method for Determination of the Weight Percent Individual VOCs in Waterborne Air-Dry Coatings by Gas Chromatography", except as provided in Subsections G.2 and G.3. An alternative method to determine the VOC content of coatings is the SCAQMD Method 304-91 (Revised February 1996), incorporated by reference in Subsection G.4.j. The exempt compounds content shall be determined by test methods referenced in Subsections G.4.f, G.4.g, or G.4.h, as applicable. To determine the VOC content of a coating, the manufacturer may use USEPA Method 24, or an alternative method as provided in Subsection G.2, formulation data, or any reasonable means for predicting that the coating has been formulated as intended (e.g. quality assurance checks, recordkeeping). However, if there are any inconsistencies between the results of a Method 24 test and any other means for determining VOC content, the Method 24 test results will govern, except when an alternative method is approved as specified in Subsection G.2. The APCO may require the manufacturer to conduct a Method 24 analysis.

2. Alternative Equivalent Test Methods: Other test methods demonstrated to provide results that are acceptable for purposes of determining compliance with Subsection G.1, after review and approval in writing by the staffs of the District, ARB and United States Environmental Protection Agency, may also be used.

3. Methacrylate Traffic Marking Coatings: Analysis of methacrylate multicomponent coatings used as traffic marking coatings shall be conducted according to a modification of U.S. Environmental Protection Agency Method 24 (40 CFR 59, subpart D, Appendix A), incorporated by reference in Section G.4.k. This method has not been approved for methacrylate multicomponent coatings used for purposes other than as traffic marking coatings or for other classes of multicomponent coatings.

4 Test Methods: The following test methods are incorporated by reference herein, and shall be used to test coatings subject to provisions of this rule:

a. Fire Resistance Rating: The fire resistance rating of a fire-resistive coating shall be determined by ASTM Designation E119-18ce1~~07~~, "Standard Test Methods for Fire

Tests of Building Construction Materials," (see Subsection J.~~19~~20, Fire-Resistive Coating).

b. Tile and Stone Sealers; Performance criteria for penetration of dense tile shall be determined by ASTM C373 "Standard Test Method for Water Absorption, Bulk Density, Apparent Porosity, and Apparent Specific Gravity of Fired Whiteware Products, Ceramic Tiles and Glass Tiles, " or by ASTM C97/C97M "Standard Test Methods for Absorption and Bulk Specific Gravity of Dimension Stone," or by ASTM C642 "Standard Test Method fo Density, Absorption and Voids in Hardened Concrete."

Static coefficient of friction shall be determined by American National Standard Specification for Ceramic Tile (ANSI A137.1).

Water vapor transmission shall be determined by ASTM E96/96M "Standard Test Method for Water Vapor Transmission of Materials."

c. Gloss Determination**:** The gloss of a coating shall be determined by ASTM Designation D523-14(2018)~~89 (1999)~~, "Standard Test Method for Specular Gloss," (see Subsections ~~J.21, J.33 and J.34~~J.22, J.38, and J.39, Flat Coating, Nonflat Coating, and Nonflat High Gloss Coating,).

d. Metal Content of Coatings**:** The metallic content of a coating shall be determined by South Coast Air Quality Management District Method 318-95,"Determination of Weight Percent Elemental Metal in Coatings by X-Ray Diffraction," South Coast Air Quality Management District "Laboratory Methods of Analysis for Enforcement Samples," (see Subsections ~~J.3, J.18, and J.31~~J.3, J.19, and J.36, Aluminum Roof Coatings, Faux Finish Coatings, and Metallic Pigmented Coating).

e. Acid Content of Coatings**:** The acid content of a coating shall be determined by ASTM Designation D1613-06, "Standard Test Method for Acidity in Volatile Solvents and Chemical Intermediates Used in Paint, Varnish, Lacquer, and Related Products," (see Subsection ~~J.39~~J.45, Pre-Treatment Wash Primers).

f. Exempt Compounds – Siloxanes**:** Exempt compounds that are cyclic, branched, or linear completely methylated siloxanes, shall be analyzed as exempt compounds for compliance with Section G by Bay Area Air Quality Management District Method 43, "Determination of Volatile Methylsiloxanes in Solvent-Based Coatings, Inks, and Related Materials," Bay Area Air Quality Management District Manual of Procedures, Volume III, adopted 11/6/96, (see Subsection ~~J.60~~J.66, Volatile Organic Compounds, and Subsection G.1).

g. Exempt Compounds – Acetone, Methy Acetate, t-Butyl Acetate, Parachlorobenzotrifluoride (PCBTF)**:** These exempt compounds shall be analyzed as exempt compounds for compliance with Section G by ASTM D6133-02, Standard Test Method for Acetone, Methyl Acetate, t-Butyl Acetate, or p-Chlorobenzotrifluoride Content of Solventborne and Waterborne Paints, Coatings, Resins and Raw Materials by Direct Injection Into a Gas Chromatograph (see Subsection ~~J.60~~J.66, Volatile Organic Compounds, and Subsection G.1).

h. Other Exempt Compounds**:** Exempt organic compound content, other than as determined in Subsections G.4.f or G.4.g shall be determined by using CARB Method 432, "Determination of Dichloromethane and 1,1,1-Trichloroethane in Paints and Coatings (September 12, 1998); or CARB Method 422, "Determination of Volatile Organic Compounds in Emissions from Stationary Sources (January 22, 1987); or South Coast AQMD Method 303-91, "Determination of Exempt Compounds" (February 1993) (see Subsection ~~J.60~~J.66, Volatile Organic Compounds, and Subsection G.1)

i. VOC Content of Coatings**:** The VOC content of a coating shall be determined by U.S. Environmental Protection Agency Method 24 as it exists in appendix A of 40 Code of Federal Regulations (CFR) part 60, "Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings," (see Subsection G.1)

j. Alternative VOC Content of Coatings**:** The VOC content of coatings may be analyzed either by U.S. Environmental Protection Agency Method 24**,** or South Coast AQMD Method 313 "Determination of VOC by Gas Chromatography-Mass Spectrometry", or South Coast Air Quality Management District Method 304-91 (Revised 1996), "Determination of Volatile Organic Compounds (VOC) in Various Materials," South Coast Air Quality Management District "Laboratory Methods of Analysis for Enforcement Samples," (see Subsection G.1)

k. Methacrylate Traffic Marking Coatings**:** The VOC content of methacrylate multi-component coatings used as traffic marking coatings shall be analyzed by the procedures in 40 CFR part 59, subpart D, appendix A, "Determination of Volatile Matter Content of Methacrylate Multi-component Coatings Used as Traffic Marking Coatings, " (September 11, 1998), (see Subsection G.3).

l. Hydrostatic Pressure for Basement Specialty Coatings: ASTM D7088-04, "Standard Practice fro Resistance to Hydrostatic Pressure for Coatings Used in Below-Grade Applications Applied to Masonry" (see Subsection J.6).

m. Tub and Tile Refinish Coating Adhesion: ASTM D4585-/D4585M-18~~99~~, "Standard Practice for Testing Water Resistance of Coatings Using Controlled Condensation" and ASTM D3359-17~~02~~, "Standard Test Method for Measuring Adhesion by Tape Test" (see Subsection ~~J.57~~J.63).

n. Tub and Tile Refinish Coating Hardness: ASTM D3363-05 (2011)e2, "Standard Test Method for Film Hardness by Pencil Test" (see Subsection ~~J.57~~J.63).

o. Tub and Tile Refinish Coating Abrasion Resistance: ASTM D4060-14~~07~~, "Standard Test Method for Abrasion Resistance of Organic Coatings by the Taber Abraser" (see Subsection ~~J.57~~J.63).

p. Tub and Tile Refinish Coating Water Resistance: ASTM D4585-99, "Standard Practice for Testing Water Resistance of Coatings Using Controlled Condensation" and ASTM D714-02~~e1~~, "Standard Test Method for Evaluating Degree of Blistering of Paints" (see Subsection ~~J.57~~J.63).

q. Waterproofing Membrane: ASTM C836-06, "Standard Specification for High Solids Content, Cold Liquid-Applied Elastomeric Waterproofing Membrane for Use with Separate Wearing Course" (see Subsection ~~J.64~~ J.70).

r. Mold and Mildew Growth for Basement Specialty Coatings: ASTM D3273-00, "Standard Test Method for Resistance to Growth of Mold on the Surface of Interior Coatings in an Environmental Chamber" and ASTM D3274-95, "Standard Test Method for Evaluating Degree of Surface Disfigurement of Paint Films by Microbial (Fungal or Algal) Growth or Soil and Dirt Accumulation" (see Subsection J.6).

s. Reactive Penetrating Sealer – Water Repellency: ASTM C67/C67M-18~~07~~, "Standard Test Methods for Sampling and Testing Brick and Structural Clay Tile"; or ASTM C97/C97M-18~~02~~, "Standard Test Method for Absorption and Bulk Specific Gravity of Dimension Stone"; or ASTM C140/C140M-18a~~06~~, "Standard Test Methods for Sampling and Testing Concrete Masonry Units and Related Units" (See Subsection ~~J.41~~J.47).

t. Reactive Penetrating Sealer – Water Vapor Transmission: ASTM E96/E96M-05, "Standard Test Method for Water Vapor Transmission of Materials" (See Subsection ~~J.41~~J.47).

u. Reactive Penetrating Sealer – Chloride Screening Applications: National Cooperative Highway Research Report 244 (1981), "Concrete Sealers for the Protection of Bridge Structures" (See Subsection ~~J.41~~J.47).

v. Stone Consolidants: ASTM E2167-01, "Standard Guide for Selection and Use of Stone Consolidants" (see Subsection ~~J.53~~J.58).

w. Surface Chalkiness: The chalkiness of a surface shall be determined using ASTM D4214-98, "Standard Test Methods for Evaluating the Degree of Chalkiness of Exterior Paint Films," (see Subsection ~~J.51~~J.56).

x. Building Envelope – Air Permeance: ASTM E2178-13, "Standard Test Method for Air Permeance of Building Materials" (See Subsection J.10)

y. Building Envelope – Water Resistivity: ASTM E331-00(2016), "Standard Test Method For Water Penetration Of Exterior Windows, Skylights, Doors, And Curtain Walls By Uniform Static Air Pressure Difference" or ASTM E96/96M-16, "Standard Test Methods For Water Vapor Transmission Of Materials" (See Subsection J.10)

5. All test methods referenced in this rule shall be the version most recently approved by the appropriate government entities.

H. Violations

Failure to comply with any provision of this rule shall constitute a violation of this rule.

I. Severability

Each provision of this rule shall be deemed severable, and in the event that any provision of this rule is held to be invalid, the remainder of this rule shall continue in full force and effect.

J. Definitions:

1. "Adhesive": Any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means.

2. "Aerosol Coating Product": A pressurized coating product containing pigments or resins that dispenses product ingredients by means of a propellant, and is packaged in a disposable can for hand-held application or for use in specialized equipment for ground traffic/marking applications.

3. "Aluminum Roof Coating": A coating labeled and formulated exclusively for application to roofs and containing at least 84 grams of elemental aluminum pigment per liter of coating (at least 0.7 pounds per gallon). Pigment content shall be determined in accordance with SCAQMD Method 318-95, incorporated by reference in Subsection G.4.d.

4. "Appurtenances"**:** Any accessory to a stationary structure coated at the site of installation, whether installed or detached, including-but not limited to: bathroom and kitchen fixtures; cabinets; concrete forms; doors; elevators; fences; hand railings; heating equipment, air conditioning equipment, and other fixed mechanical equipment or stationary tools; lampposts; partitions; pipes and piping systems; rain gutters and downspouts; stairways, fixed ladders, catwalks, and fire escapes; and window screens.

5. "Architectural Coating": A coating to be applied to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, to fields or lawns, or to curbs. Coatings applied in shop applications or to nonstationary structures, such as airplanes, ships, boats, railcars and automobiles, are not considered to be architectural coatings for the purposes of this rule, nor are adhesives.

6. "Basement Specialty Coating": A clear or opaque coating that is labeled and formulated for application to concrete and masonry surfaces to provide a hydrostatic seal for basements and other below-grade surfaces and that meets or exceeds the following criteria:

   a. Capable of withstanding at least 10 psi hydrostatic pressure as determined in accordance with ASTM D7088-~~04~~17, which is incorporated by reference in Subsection G.4.l.

   b. Must be resistant to mold and mildew growth, and must achieve a microbial growth rate of 8 or more (10 is no growth) as determined in accordance with ASTM D3273-~~00~~16 and ASTM D3274-~~95~~09(2017), incorporated by reference in Subsection G.4.r.

7. "Bitumens": Black or brown materials including, but not limited to, asphalt, tar, pitch and asphaltite that are soluble in carbon disulfide, consist mainly of hydrocarbons that are obtained from natural deposits or as residues from the distillation of crude petroleum or coal.

8. "Bituminous Roof Coating": A coating that incorporates bitumens that is labeled and formulated exclusively for roofing.

9. "Bituminous Roof Primer": A primer that incorporates bitumens that is labeled and formulated exclusively for roofing and intended for the purpose of preparing a weathered or aged surface or improving the adhesion of subsequent surfacing components.

10. "Building Envelope": The ensemble of exterior and demising partitions of a building that enclose conditioned space.

110. "Bond Breaker": A coating labeled and formulated for application between layers of concrete to prevent a freshly poured top layer of concrete from bonding to the layer over which it is poured.

121. "Coating": A material applied onto or impregnated into a substrate for protective, decorative, or functional purposes. Such materials include, but are not limited to, paints, varnishes, sealers, and stains.

132. "Colorant": A concentrated pigment dispersion in water, solvent, and/or binder that is added to an architectural coating after packaging in sale units to produce the desired color.

143. "Concrete Curing Compound": A coating labeled and formulated for application to freshly poured concrete to perform one or more of the following functions:
a. Retard the evaporation of water; or
b. Harden or dustproof the surface of freshly poured concrete.

154. "Concrete/Masonry Sealer": A clear or opaque coating that is labeled and formulated primarily for application to concrete and masonry surfaces to perform one or more of the following functions:
a. Prevent penetration of water; or
b. Provide resistance against abrasion, alkalis, acids, mildew, staining or ultraviolet light; or
c. Harden or dustproof the surface of aged or cured concrete.

16. "Default Coating": Any specialty coating (those other than flat or nonflat coatings) that is not defined in this Section J as any other coating category.

1715. "Driveway Sealer": A coating labeled and formulated for application to worn asphalt driveway surfaces to perform one or more of the following functions:
a. Fill cracks; or
b. Seal the surface to provide protection; or
c. Restore or preserve the appearance.

1816. "Dry Fog Coating (Dry Fall)": A coating labeled and formulated only for spray application such that overspray droplets dry before subsequent contact with incidental surfaces in the vicinity of the surface coating activity.

1917. "Exempt Organic Compounds": Shall be as defined in Rule 2 of these rules. Exempt compounds content of a coating shall be determined by test methods as referenced in Subsections G.4.f, G.4.g, or G.4.h, as applicable.

2018. "Faux Finishing Coating": A coating labeled and formulated to meet one or more of the following criteria:

a. A glaze or textured coating used to create artistic effects, including but not limited to: dirt, suede, old age, smoke damage, and simulated marble and wood grain; or

b. A decorative coating used to create a metallic, iridescent, or pearlescent appearance that contains at least 48 grams of pearlescent mica pigment or other iridescent pigment per liter of coating as applied; or

c. A decorative coating used to create a metallic appearance that contains less than 48 grams of elemental metallic pigment per liter of coating as applied, when tested in accordance with SCAQMD Method 318-95, incorporated by reference in Subsection G.4.d; or

d. A decorative coating used to create a metallic appearance that contains 48 grams or greater of elemental metallic pigment per liter of coating as applied and which requires a clear topcoat to prevent the degradation of the finish under normal use conditions. The metallic pigment content shall be determined in accordance with SCAQMD Method 318-95, incorporated by reference in Subsection G.4.d; or

e. A clear topcoat to seal and protect a Faux Finishing coating that meets the one of the above criteria. This clearcoat shall be offered for sale, sold and applied solely as part of a Faux Finishing coating system, and must be labeled in accordance with Subsection C.139.

2119. "Fire-Resistive Coating": A coating labeled and formulated to protect the structural integrity by increasing the fire endurance of interior or exterior steel and other structural materials. The Fire-Resistive category includes sprayed fire resistive materials and intumescent fire-resistive coatings that are used to bring structural materials into compliance with federal, state, and local building codes. The fire-resistive coating and the testing agency must be approved by building code officials. The Fire-Resistive coating shall be tested in accordance with ASTM Designation E119-18ce107, incorporated by reference in Subsection G.4.ab.

~~20. "Fire Retardant Coating": A coating labeled and formulated to retard ignition and flame spread, that has been 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 shall be tested in accordance with ASTM Designation E84-07, incorporated by reference in Subsection G.4.a. The fire retardant coating and testing agency shall be approved by building code officials.~~

~~Effective January 1, 2011, the Fire Retardant coating category is eliminated and coatings with fire retardant properties will be subject to the VOC limit of their primary coating category(Flat, Nonflat, Wood, etc.)~~

2221. "Flat Coating": A coating that does not meet the criteria listed under any other definition in this rule and that registers gloss less than 15 on an 85-degree meter or less than 5 on a 60-

degree meter according to ASTM Designation D523-14(2018)~~89(1999)~~, incorporated by reference in Subsection G.4.c.

23~~22~~. "Floor Coating": An opaque coating that is labeled and formulated for application to flooring, including, but not limited to, decks, porches, steps, garage floors, and other horizontal surfaces which may be subject to foot traffic. The Floor Coating category is not intended for products that are applied to industrial floors, public bathroom floors, or jail floors. In addition, clear coatings for wood floors are not subject to the VOC limits of this coating category.

24~~23~~. "Form Release Compound": A coating labeled and formulated for application to a concrete form to prevent the freshly poured concrete from bonding to the form. The form may consist of wood, metal, or some material other than concrete.

25. "Formulation Data": The actual product recipe which itemizes all the ingredients contained in a product including VOCs and the quantities thereof used by the manufacturer to create the product. Material Safety Data Sheets (MSDS) are not considered formulation data.

26~~24~~. "Graphic Arts Coating (sign paint)": A coating labeled and formulated for hand-application by artists using brush, airbrush, or roller techniques to indoor and outdoor signs (excluding structural components) and murals, including lettering enamels, poster colors, copy blockers, and bulletin enamels.

27~~25~~. "High Temperature Industrial Maintenance Coating": A high performance coating labeled and formulated for application to substrates exposed continuously or intermittently to temperatures above 400°F (204°C).

28~~26~~. "Industrial Maintenance Coating": A high performance architectural coating, including primers, sealers, undercoaters, intermediate coats, and topcoats, formulated for application to substrates, including floors, exposed to one or more of the following extreme environmental conditions listed below and labeled as specified in Subsection C.4.

a. Immersion in water, wastewater, or chemical solutions (aqueous and non-aqueous solutions), or chronic exposure of interior surfaces to moisture condensation.
b. Acute or chronic exposure to corrosive, caustic or acidic agents, or to chemicals, chemical fumes, or chemical mixtures, or solutions.
c. Repeated exposure to temperatures above 250°F (121°C).
d. Repeated (frequent) heavy abrasion, including mechanical wear and repeated (frequent) scrubbing with industrial solvents, cleansers, or scouring agents.
e. Exterior exposure of metal structures and structural components.

29. "Interior Stains": Stains labeled and formulated exclusively for use on interior surfaces.

30. "Intumescent": A material that swells as a result of heat exposure, thus increasing in volume and decreasing in density.

31~~27~~. "Low-Solids Coating": A coating containing one pound or less of solids per gallon (0.12 kilogram or less of solids per liter) of coating material as recommended for application by the manufacturer. The VOC content for Low-Solids coatings shall be determined in accordance with Subsection ~~J.61~~J.67.

32~~28~~. "Magnesite Cement Coating": A coating labeled and formulated for application to magnesite cement decking to protect the magnesite cement substrate from erosion by water.

33. "Market": To facilitate sales through third party vendors including, but not limited to, catalog or ecommerce sales that bring together buyers and sellers. For the purpose of this rule, market does not mean to generally promote or advertise coatings.

34~~29~~. "Mastic Texture Coating": A coating labeled and formulated to cover holes and minor cracks, and to conceal surface irregularities, and is applied in a single coat of at least 10 mils (0.010 inch) dry film thickness.

35~~30~~. "Medium Density Fiberboard (MDF): A composite wood product, panel, molding, or other building material composed of cellulosic fibers (usually wood) made by dry forming and pressing of a resinated fiber mat.

36~~31~~. "Metallic Pigmented Coating": A coating that is labeled and formulated to provide a metallic appearance. Metallic Pigmented coatings must contain at least 48 grams of elemental metallic pigment (excluding zinc) per liter of coating as applied, when tested in accordance with SCAQMD Method 318-95, incorporated by reference in Subsection G.4.d. The Metallic-Pigmented Coating category does not include Roof Coatings or Zinc-Rich Primers.

37~~32~~. "Multi-Color Coating": A coating that is packaged in a single container and that exhibits more than one color when applied in a single coat.

38~~33~~. "Nonflat Coating": A coating that does not meet the criteria under any other definition in this rule and that registers a gloss of 15 or greater on an 85 degree meter and 5 or greater on a 60 degree meter according to ASTM Designation D523-14 (2018)~~89 (1999)~~, incorporated by reference in Subsection G.4.c.

39~~34~~. "Nonflat- High Gloss Coating": A coating that registers a gloss of 70 or greater on a 60 degree meter according to ASTM Designation D523-14 (2018)~~89 (1999)~~, incorporated by reference in Subsection G.4.c. ~~Nonflat-High Gloss coatings must be labeled in accordance with Subsection C.9.~~

40~~35~~. "Particleboard": A composite wood product panel, molding, or other building material composed of a cellulosic material (usually wood) in the form of discrete particles, as distinguished from fibers, flakes, or strands, that are pressed together with resin.

41~~36~~. "Pearlescent": Exhibiting various colors depending on the angles of illumination and viewing, as observed in mother-of-pearl.

42. "Pigmented": This means containing colorant or dry coloring matter, such as an insoluble powder, to impart color to a substrate.

43~~37~~. "Plywood": A panel product consisting of layers of wood veneers or composite core pressed together with resin. Plywood includes panel products made by either hot or cold pressing (with resin) veneers to a platform.

4438. "Post-Consumer Coating": A finished coating generated by a business or consumer that has served their intended end uses, and is recovered from or otherwise diverted from the waste stream for the purpose of recycling.

4539. "Pre-treatment Wash Primer": A primer which contains at least one-half percent acid, by weight, when tested in accordance with ASTM Designation D1613-06, incorporated by reference in Subsection G.4.e, that is labeled and formulated for application directly to bare metal surfaces to provide corrosion resistance and to promote adhesion of subsequent topcoats.

4640. "Primer, Sealer, and Undercoater": A coating labeled and formulated for one or more of the following purposes:

a. To provide a firm bond between the substrate and the subsequent coatings; or
b. To prevent subsequent coatings from being absorbed by the substrate; or
c. To prevent harm to subsequent coatings by materials in the substrate; or
d. To provide a smooth surface for the subsequent application of coatings; or
e. To provide a clear finish coat to seal the substrate; or
f. To block materials from penetrating into or leaching out of a substrate.

4741. "Reactive Penetrating Sealer": A clear or pigmented coating that is labeled and formulated for application to above-grade concrete and masonry to provide protection from water and waterborne contaminants, including but not limited to, alkalis, acids, and salts. ~~Reactive Penetrating Sealers must penetrate into concrete and masonry and chemically react to form covalent bonds with naturally occurring minerals in the substrate. Reactive Penetrating Sealers line the pores of concrete and masonry with a hydrophobic coating, but do not form a surface film.~~ Reactive Penetrating Sealers must meet all of the following criteria:

a. Used only for reinforced concrete bridge structures for transportation projects within 5 miles of the coast or above 4,000 feet elevation; or for restoration and/or preservation projects on registered historic buildings that are under the purview of a restoration architect.
b. Penetrate into concrete and masonry substrates and chemically react to form covalent bonds with naturally occurring minerals in the substrate.
c. Line the pores of concrete and masonry substrates with a hydrophobic coating, but does not form a surface film.
d. Improve water repellency at least 80 percent after application on a concrete or masonry substrate. This performance must be verified on standardized test specimens per ASTM C67 or ASTM C97/97M or ASTM C140.
e. Provide a breathable waterproof barrier for concrete or masonry surfaces that does not prevent or substantially retard water vapor transmission. This performance must be verified in standardized test specimens per ASTM E96/E96M or ASTM D6490.
f. Meet the performance criteria listed in the National Cooperative Highway Research Report 244 (1981) or later versions, surface chloride screening applications, for products labeled and formulated for vehicular traffic.

~~a. The Reactive Penetrating Sealer must improve water repellency at least 80 percent after application on concrete or masonry. This performance must be verified on standardized test specimens, in accordance with one or more of the following standards, as incorporated by reference in Subsection G.4.t: ASTM C67-07, ASTM C97-02, or ASTM C140-06; and~~

~~b. The Reactive Penetrating Sealer must not reduce the water vapor transmission rate by more than 2 percent after application on concrete or masonry. This performance must be verified on standardized test specimens, in accordance with ASTM E96/E96M-05, incorporated by reference in Subsection G.4.t; and~~

~~c. Products labeled and formulated for vehicular traffic surface chloride screening applications must meet the performance criteria listed in the National Cooperative Highway Research Project 244 (1981), incorporated by reference in Subsection G.4.u.~~

Reactive Penetrating Sealers must be labeled in accordance with Subsection C.~~14~~10.

48~~42~~. "Recycled Coating": An architectural coating formulated such that it contains a minimum of 50 percent by volume post-consumer coating, with a maximum of 50 percent by volume secondary industrial materials or virgin materials.

49~~43~~. "Residential": Areas where people reside or lodge, including, but not limited to, single and multiple family dwellings, condominiums, mobile homes, apartment complexes, motels and hotels.

50~~44~~. "Roof coating": A non-bituminous coating labeled and formulated exclusively for application to roofs and for the primary purpose of preventing penetration of the substrate by water, or reflecting heat and ultraviolet radiation.

51~~45~~. "Rust Preventative Coating": A coating formulated to prevent the corrosion of metal surfaces for one or more of the following applications:

a. Direct-to-metal coating; or
b. Coating intended for application over rusty, previously coated surfaces.

The Rust Preventative category does not include the following:

c. Coatings that are required to be applied as a topcoat over a primer; or
d. Coatings that are intended for use or used on wood or any other nonmetallic surface.

Rust Preventative coatings are for metal substrates only and must be labeled as such, in accordance with the labeling requirements in Subsection C.~~6~~5.

52~~46~~. "Secondary Industrial Materials ": Products or by-products of the paint manufacturing process that are of known composition and have economic value but can no longer be used for their intended purpose.

53~~47~~. “Semitransparent Coating”: A coating that contains binders and colored pigments and is formulated to change the color of the surface, but not conceal the grain pattern or texture.

54~~48~~. "Shellac": A clear or opaque coating formulated solely with the resinous secretions of the lac beetle (*Laciffer lacca*) and formulated to dry by evaporation without a chemical reaction providing a quick-drying, solid, protective film for priming and sealing stains and odors; and for wood finishing excluding floors.

5549. "Shop Application": Application of a coating to a product or a component of a product in or on the premises of a factory or a shop as part of a manufacturing, production, or repairing process (e.g., original equipment manufacturing coatings).

5650. "Solicit": To require for use or to specify, by written or oral contract.

~~51. "Specialty Primer, Sealer and Undercoater": A coating labeled as specified in Subsection C.7 and that is formulated for application to a substrate to block water-soluble stains resulting from: fire damage, smoke damage, or water damage. Until January 1, 2012, the Specialty Primer, Sealer, and Undercoater category includes coatings formulated to seal excessively chalky surfaces. An excessively chalky surface is one that is defined as having a chalk rating of four or less as determined by ASTM D 4214-98, incorporated by reference in Subsection G.4.w.~~

5752. "Stain": A semitransparent or opaque coating labeled and formulated to change the color of a surface but not conceal the grain pattern or texture. Stains labeled and formulated exclusively for use on interior surfaces are only subject to VOC limits for Interior stains.

5853. "Stone Consolidant": A coating that is labeled and formulated for application to stone to repair historical structures that have been damaged by weathering or other decay mechanisms. Stone Consolidants must penetrate into stone to create bonds between particles and consolidate deteriorated material. Stone Consolidants must be specified and used in accordance with ASTM E2167-01, incorporated by reference in Subsection G.4.v. Stone Consolidants are for professional use only and must be labeled as such, in accordance with the labeling requirements of Subsection C.106.

5954. "Swimming Pool Coating": A coating labeled and formulated to coat the interior of swimming pools and to resist swimming pool chemicals. Swimming pool coatings include coatings used for swimming pool repair and maintenance.

60. "Tile and Stone Sealers": Clear or pigmented sealers that are used for sealing tile, stone, or grout to provide resistance against water, alkalis, acids, ultraviolet light or staining and which meet one of the following subcategories:

a. Penetrating sealers are polymer solutions that cross-link in the substrate and must meet the following criteria:

1) A fine particle structure to penetrate dense tile such as porcelain with absorption as low as 0.10 percent per ASTM C373, ASTM C97/C97M, or ASTM C642.

2) Retain or increase static coefficient of friction per ANSI A137.1.

3) Not create a topical surface film on the tile or stone, and

4) Allow vapor transmission per ASTM E96/96M.

b. Film forming sealers which leave a protective film on the surface.

6155. "Tint Base": An architectural coating to which colorant is added after packaging in sale units to produce a desired color.

6256. "Traffic Marking Coating": A coating labeled and formulated for marking and striping streets, highways, or other traffic surfaces including, but not limited to, curbs, berms, driveways, parking lots, sidewalks, and airport runways. This coating category shall also include methacrylate multicomponent coatings used as traffic marking coatings. The VOC

content of methacrylate multicomponent coatings shall be determined by the procedures in 40 CFR Part 59, Subpart D, Appendix A.

6357. "Tub and Tile Refinish Coating": A clear or opaque coating that is labeled and formulated exclusively for refinishing the surface of a bathtub, shower, sink, or countertop. Tub and Tile Refinish coatings must meet all of the following criteria:

a. The coating must have a scratch hardness of 3H or harder and a gouge hardness of 4H or harder. This must be determined on Bonderite 1000, in accordance with ASTM D3363-05 (2011)e2, incorporated by reference in Subsection G.4.n.

b. The coating must have a weight loss of 20 milligrams or less after 1000 cycles. This must be determined with CS-17 wheels on Bonderite 1000, in accordance with ASTM D4060-1407, incorporated by reference in Subsection G.4.o.

c. The coating must withstand 1000 hours or more of exposure with few or no #8 blisters. This must be determined on unscribed Bonderite, in accordance with ASTM D4585-99 and ASTM D714-02e1, incorporated by reference in Subsection G.4.p.

d. The coating must have an adhesion rating of 4B or better after 24 hours of recovery. This must be determined on unscribed Bonderite, in accordance with ASTM D4585-/D4585M-1899 and ASTM D3359-1702, incorporated by reference in Subsection G.4.m.

6458. "Veneer": Thin sheets of wood peeled or sliced from logs for use in the manufacture of wood products such as plywood, laminated veneer lumber, or other products.

6559. "Virgin Materials": Materials that contain no post-consumer coatings or secondary industrial materials.

6660. "Volatile Organic Compounds (VOC)": Shall have the same meaning as Reactive Organic Compounds (ROC) as defined in Rule 2 of these rules.

6761. "VOC Actual": The weight of VOC per volume of coating and is calculated by the following equation:

$$\text{VOC Actual} = \frac{W_s - W_w - W_{es}}{V_m}$$

Where:

VOC Actual	=	Grams of VOC per liter of coating (also known as "Material VOC")
W_s	=	Weight of volatile compounds (grams)
W_w	=	Weight of water (grams)
W_{es}	=	Weight of exempt organic compounds (grams)
V_m	=	Volume of coating or colorant (liters)

6862. "VOC Content": The weight of VOC per volume of coating. VOC content is VOC Regulatory, as defined in Subsection J.63J.69, for all coatings or colorants except those in the Low Solids category. For coatings or colorants in the Low Solids category, the VOC content is VOC Actual, as defined in Subsection J.61J.67. If the coating is a multi-

component product, the VOC content is VOC Regulatory as mixed or catalyzed. If the coating contains silanes, siloxanes, or other ingredients that generate ethanol or other VOCs during the curing process, the VOC content must include the VOCs emitted during curing.

6963. "VOC Regulatory": The weight of VOC per volume of coating or colorant, less the volume of water and exempt organic compounds, and is calculated by the following equation:

$$\text{VOC Regulatory} = \frac{W_s - W_w - W_{es}}{V_m - V_w - V_{es}}$$

Where : VOC Regulatory = Grams of VOC per liter of coating or colorant, less water and exempt organic compounds (also know as "Coating VOC")

W_s	=	Weight of volatile compounds (grams)
W_w	=	Weight of water (grams)
W_{es}	=	Weight of exempt organic compounds (grams)
V_m	=	Volume of coating or colorant material (liters)
V_w	=	Volume of water (liters)
V_{es}	=	Volume of exempt organic compounds (liters)

7064. "Waterproofing Membrane": A clear or opaque coating that is labeled and formulated for application to concrete and masonry to provide a seamless waterproofing membrane that prevents any penetration of liquid water into the substrate. Waterproofing Membranes are intended for the following waterproofing applications: below-grade surfaces, between concrete slabs, inside tunnels, inside concrete planters, and under flooring materials. Waterproofing Membranes must meet the following criteria:

a. Coating must be applied in a single coat of at least 25 mils (at least 0.025 inch) dry film thickness; and

b. Coatings must meet or exceed the requirements contained in ASTM C836/C836M-0618, incorporated by reference in Subsection G.4.q.

The Waterproofing Membrane category does not include topcoats that are included in the Concrete/Masonry Sealer category (e.g., parking deck topcoats, pedestrian deck topcoats, etc.).

7165. "Wood Coatings": Coatings labeled and formulated for application to wood substrates only. The Wood Coatings category includes the following clear and semitransparent coatings: lacquers; varnishes; sanding sealers; penetrating oils; clear stains; wood conditioners used as undercoats; and wood sealers used as topcoats. The Wood Coatings category also includes the following opaque wood coatings: opaque lacquers; opaque sanding sealers; and opaque lacquer undercoaters. The Wood Coatings category does not include the following: clear sealers that are labeled and formulated for use on concrete or masonry; or coatings intended for substrates other than wood.

Wood Coatings must be labeled for "For Wood Substrates Only," in accordance with Subsection C.117.

7266. "Wood Preservative": A coating labeled and formulated to protect exposed wood from decay or insect attack, that is registered with both the U.S. EPA under Federal Insecticide, Fungicide, and Rodenticide Act (7 United States Code (USC) Section 136, *et seq.*) and with the California Department of Pesticide Regulation.

7367. "Wood Substrate": A substrate made of wood, particleboard, plywood, medium density fiberboard, rattan, wicker, bamboo, or composite products with exposed wood grain. Wood products do not include items comprised of simulated wood.

7468. "Zinc-Rich Primer": A coating that meets all of the following specifications:

a. Coating contains at least 65 percent metallic zinc powder or dust by weight of total solids.

b. Coating is formulated for application to metal substrates to provide a firm bond between the substrate and subsequent coatings.

c. Coating is intended for professional use only and is labeled as such in accordance with labeling requirements in Subsection C.129.

~~69. "Antenna Coating": A coating labeled and formulated exclusively for application to equipment and associated structural appurtenances that are used to receive or transmit electromagnetic signals. Effective January 1, 2011, a coating meeting this definition will be subject to the applicable category in Subsection B.1, Table 2, except as provided in Subsection B.2, Most Restrictive VOC Limits.~~

~~70. "Antifouling Coating": A coating labeled and formulated for application to submerged stationary structures and their appurtenances to prevent or reduce the attachment of marine or freshwater organisms. To qualify as a antifouling coating, the coating shall be registered with both the U.S.EPA under the Federal Insecticide, Fungicide and Rodenticide Act (7 U.S.C. Section 136, *et seq*.) and with the California Department of Pesticide Regulation. Effective January 1, 2011, a coating meeting this definition will be subject to the applicable category in Subsection B.1, Table 2, except as provided in Subsection B.2, Most Restrictive VOC Limits.~~

~~71. "Clear Brushing Lacquers": Clear wood finishes, excluding clear lacquer sanding sealers, formulated with nitrocellulose or synthetic resins to dry by solvent evaporation without chemical reaction and to provide a solid protective film, which are intended exclusively for application by brush, and which are labeled as specified in Subsection C.5. Effective January 1, 2011, a coating meeting this definition will be subject to the applicable category in Subsection B.1, Table 2, except as provided in Subsection B.2, Most Restrictive VOC Limits.~~

~~72. "Clear Wood Coatings": Clear and semi-transparent coatings, including lacquers and varnishes, applied to wood substrates to provide a transparent or translucent solid film. Effective January 1, 2011, a coating meeting this definition will be subject to the applicable category in Subsection B.1, Table 2, except as provided in Subsection B.2, Most Restrictive VOC Limits.~~

~~73. "Flow Coating": A coating labeled and formulated exclusively for use by electric power companies or their subcontractors to maintain the protective coating systems present on utility transformer units. Effective January 1, 2011, a coating meeting this definition will be subject to the applicable category in Subsection B.1, Table 2, except as provided in Subsection B.2, Most Restrictive VOC Limits.~~

~~74. "Lacquer": A clear or opaque wood coating, including clear lacquer sanding sealers, formulated with cellulosic or synthetic resins to dry by evaporation without chemical reaction and provide a solid protective film. Effective January 1, 2011, a coating meeting this definition will be subject to the applicable category in Subsection B.1, Table 2, except as provided in Subsection B.2, Most Restrictive VOC Limits~~

~~75. "Quick-Dry Enamel": A non-flat coating that is labeled as specified in Subsection C.8 and that is formulated to have the following characteristics:~~

a. Is capable of being applied directly from the container under normal conditions, normal conditions being ambient temperatures between 60°F (16°C) and 80°F (27°C);

b. When tested in accordance with ASTM Designation D 1640-95, they shall sets to touch in two hours or less, dry hard in eight hours or less, and be tack free in four hours or less by the mechanical test method; and

c. Has a dried film gloss of 70 or above on a 60 degree meter.

Effective January 1, 2011, a coating meeting this definition will be subject to the applicable category in Subsection B.1, Table 2, except as provided in Subsection B.2, Most Restrictive VOC Limits.

76. "Quick-Dry Primer, Sealer, and Undercoater" A primer, sealer, or undercoater that is dry to the touch in one-half hour and can be recoated in 2 hours (ASTM Designation D1640-95 Effective January 1, 2011, a coating meeting this definition will be subject to the applicable category in Subsection B.1, Table 2, except as provided in Subsection B.2, Most Restrictive VOC Limits.

77. "Sanding Sealer": A clear or semi-transparent wood coating labeled and formulated for application to bare wood to seal the wood and to provide a coat that can be abraded to create a smooth surface for subsequent applications of coatings. A sanding sealer that also meets the definition of a lacquer is not included in this category, but is included in the lacquer category. Effective January 1, 2011, a coating meeting this definition will be subject to the applicable category in Subsection B.1, Table 2, except as provided in Subsection B.2, Most Restrictive VOC Limits.

78. "Swimming Pool Repair and Maintenance Coating": A rubber based coating labeled and formulated to be used rubber based coatings for the repair and maintenance of swimming pools. Effective January 1, 2011, a coating meeting this definition will be subject to the applicable category in Subsection B.1, Table 2, except as provided in Subsection B.2, Most Restrictive VOC Limits.

79. "Temperature-Indicator Safety Coating": A coating labeled and formulated as a color-changing indicator coating for the purpose of monitoring the temperature and safety of the substrate, underlying piping, or underlying equipment, and for application to substrates continuously or intermittently exposed to temperatures above 400°F (204°C). Effective January 1, 2011, a coating meeting this definition will be subject to the applicable category in Subsection B.1, Table 2, except as provided in Subsection B.2, Most Restrictive VOC Limits.

80. "Varnish": A clear or semi-transparent wood coating, excluding lacquers and shellacs, formulated to dry by chemical reaction on exposure to air. Varnishes may contain small amounts of pigment to color a surface, or to control the final sheen or gloss of the finish. Effective January 1, 2011, a coating meeting this definition will be subject to the applicable category in Subsection B.1, Table 2, except as provided in Subsection B.2, Most Restrictive VOC Limits.

81. "Waterproofing Sealer": A coating labeled and formulated for application to a porous substrate for the primary purpose of preventing the penetration of water. Effective January 1, 2011, a coating meeting this definition will be subject to the applicable category in Subsection B.1, Table 2, except as provided in Subsection B.2, Most Restrictive VOC Limits.

82. "Waterproofing Concrete/Masonry Sealer": A clear or pigmented film-forming coating that is labeled and formulated for sealing concrete and masonry to provide resistance against water, alkalis, acids, ultraviolet light and staining. Effective January 1, 2011, a coating

~~meeting this definition will be subject to the applicable category in Subsection B.1, Table 2, except as provided in Subsection B.2, Most Restrictive VOC Limits.~~

Table of Standards (Specialty Coatings – Organized by Substrate)[7]

SUBSTRATE	SPECIALTY COATING CATEGORY	CURRENT LIMIT[8,9]	EFFECTIVE 1/1/20~~12~~21
Asphalt	Driveway Sealer	~~100~~50	
Concrete/Masonry	Basement Specialty	400	
	Bond Breaker	350	
	Concrete Curing Compounds	350	
	Concrete/Masonry Sealers	~~350~~100	
	Magnesite Cement	450	
	Mastic Texture Coating	~~300~~100	
	Reactive Penetrating Sealer	350	
	Stone Consolidants	450	

[7]Table of Standards Organized by Substrate is for illustrative purposes only, and does not in any way modify the definitions of coating categories in Section J.
[8] The specified limits remain in effect unless revised limits are listed in subsequent columns in the table.
[9] Conversion factor: one pound VOC per gallon (U.S.) = 119.95 grams VOC per liter.

SUBSTRATE	SPECIALTY COATING CATEGORY	CURRENT LIMIT[10,11]	EFFECTIVE 1/1/2021
	Swimming Pool	340	
	Waterproofing Membrane	~~400~~250	100
Floor	Floor Coatings	~~250~~100	50
Metal	Pre-Treatment Wash Primer	420	
	Rust Preventative	~~400~~250	
Roof	Aluminum Roof Coating	~~500~~400	100
	Bituminous Roof Coating	~~300~~50	
	Bituminous Roof Primer	350	
	Roof Coatings	~~250~~50	
Wood	Wood Coatings	~~680~~275	
	Wood Preservatives	350	
Various Substrates	Building Envelope Coating		50
	Dry Fog Coating	~~400~~150	50
	Faux Finishing	350	
	Fire Resistive	350	150
	Form Release Compound	250	100
	Graphic Arts Coatings	500	
	High Temperature I.M.	420	
	Industrial Maintenance	250	
	Low-Solids Coating	120	
	Metallic Pigmented	500	
	Multi-Color	250	
	Primers, Sealers & Undercoaters	~~200~~100	~~100~~
	Recycled Coatings	250	
	Shellac –Clear	730	
	Shellac – Opaque	550	
	~~Specialty Primers Sealers & Undercoaters~~	~~350~~	~~100~~
	Stains (Exterior/Dual)	250	100
	Interior Stains	250	
	Traffic Marking	~~150~~100	
	Tub & Tile Refinishing	420	
	Zinc-Rich Primers	~~500~~340	

[10] The specified limits remain in effect unless revised limits are listed in subsequent columns in the table.
[11] Conversion factor: one pound VOC per gallon (U.S.) = 119.95 grams VOC per liter.

APPENDIX B

STAFF REPORT

PROPOSED AMENDMENTS TO RULE 74.2, ARCHITECTURAL COATINGS

Ventura County Air Pollution Control District

669 County Square Drive
Ventura, California 93003

August 2020

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DISCLAIMER

This report contains references to company and product names to illustrate product availability. Mention of these names is not to be considered an endorsement by the Ventura County Air Pollution Control District.

EXECUTIVE SUMMARY

Staff is proposing to adopt amendments to Rule 74.2, Architectural Coatings, to reduce the reactive organic compound (ROC) emissions from the coating of structures and their appurtenances. This rule development is based on the current ROC limits on coatings and colorants adopted by the Air Resources Board 2019 Suggested Control Measure (SCM). A survey of architectural coatings in the county indicates that available coatings now meet current 2019 SCM ROC limits.

At this time, staff is not proposing to eliminate the small container exemption from rule requirements that allows the sale of 1 liter or smaller coating containers (1.057 quarts) without regard to ROC content. South Coast AQMD has eliminated this exemption in Rule 1113 for many categories. Staff may consider eliminating these exemptions in the future. According to emission inventory in the South Coast district, small coating containers are only one percent of the sales volume, but emit almost 20 percent of the ROC emissions from architectural coatings.

Ventura County is designated as a nonattainment area for the state ozone standard and a serious nonattainment area for the federal ozone standard. The California Clean Air Act requires areas designated as serious nonattainment for ozone to adopt control measures required in Sections 40913, 40914, and 40919 of the California Health and Safety Code (H & SC):

- Section 40913 requires districts to develop a plan to achieve California's ambient air quality standard by the earliest practicable date. Control Measure R-303-2020 in the District's 2016 Air Quality Management Plan references the architectural coatings rule. Rule 74.2 is being amended to implement this control measure.
- Section 40914 requires each district plan to demonstrate that the plan includes "every feasible measure." Districts must adopt the most effective and feasible control measures to reduce ROC emissions from architectural coatings. Amendments to Rule 74.2 are being proposed to meet this requirement.

Staff is proposing to reduce ROC emissions from architectural coating operations in Ventura County by reducing the ROC content of the following coating categories: nonflats; nonflat – high gloss; dry fog; fire resistive; floor; form release compounds; aluminum roof coatings; waterproofing membranes; and exterior stain coatings. Additionally, staff is proposing to further reduce ROC emissions or improve rule clarity by adding the following new specialty coating categories: Interior Stains; Building Envelope Coatings; Tile and Stone Sealers; and a Default category.

Proposed amendments to Rule 74.2 will affect many architectural coatings used on new structures and their appurtenances and used to maintain existing structures and appurtenances. This rule impacts field-applied architectural coatings rather than those applied in a spray booth.

The estimated ROC emission reductions from the proposed amendments are approximately 22.12 tons per year emission reductions, or about 9 percent reduction from the current inventory.

Ventura County APCD staff included cost estimates provided by CARB's analysis found in the 2019 SCM. The cost-effectiveness ranged from -$6 per pound of ROC reduced when switching to a compliant dry fog coating to over $19 per pound of ROC reduced when switching to a compliant floor coating with an average cost effectiveness of $1.85 per pound of ROC reduced. These cost increases only apply to one and five gallon specialty coating containers since one quart containers would continue to be exempt from rule requirements.

This report contains five additional sections: (1) Background, (2) Proposed Rule Requirements, (3) Comparison of Proposed Rule Requirements with Other Air Pollution Control Requirements, (4) Impact of the Proposed Rule, and (5) Environmental Impacts and Methods of Compliance. The first section provides background information including regulatory history, latest air pollution control technology and source description. The second section explains the key features of proposed amendments to Rule 74.2. The third section compares the proposed requirements with existing federal requirements and Best Available Control Technology (BACT). The fourth section is an analysis of the effect of the proposed rule on ROC emissions and socioeconomic impacts. The last section examines the environmental impacts of compliance methods and the mitigation of those impacts.

BACKGROUND

Introduction

Architectural Coatings are defined as any coating applied to a stationary structure and their appurtenances, to mobile homes, to portable buildings, to pavements, or to curbs. Architectural coatings are formulated with a variety of components including pigments, resins, solvents, and different additives such as driers, anti-skinning agents, anti-sag agents, dispersing agents, defoaming agents, preservatives and fungicides. The primary source of air emissions from architectural coatings is the solvent component in solvent-based coatings and the co-solvents from waterborne coatings.

Currently, architectural coatings in Ventura County are regulated by Rule 74.2, which was first adopted on June 19, 1979, and was based on the ARB's 1977 Model Rule. ARB and the air districts subsequently revised this model rule in 1985, 1989, 2000, and 2007. The 2007 Suggested Control Measure (SCM) was the basis for the last major revisions to this rule in 2010. VCAPCD attempted to amend Rule 74.2 again in 2017. However, due to comments received by industry, staff postponed rule development to allow ARB to adopt the 2019 SCM.

The need to revisit Rule 74.2 has arisen because of advances in coatings technology over the past seven years, the need for emission reductions to attain health-based air quality standards in Ventura County, an updated SCM by ARB, and the need for a contingency measure for potentially not meeting the 2008 federal ozone standard of 75 ppb. The proposed amendments to Rule 74.2 are based on the 2019 SCM developed by ARB.

As a neighboring air district to SCAQMD, Ventura County is part of the Southern California distribution network for architectural coatings. A recent survey of architectural coatings being sold in the county indicates that almost all of them were manufactured to meet the current ROC coating content limits required by SCAQMD Rule 1113 which are as stringent or exceed the ROC limits in the 2019 SCM. Thus, the proposed amendments to Rule 74.2 which adopt limits less stringent than SCAQMD should not impact the ability of coating retailers to provide compliant coatings. Currently, there are no paint manufacturing companies in the county.

Another important factor that allows Ventura County to adopt lower limits is that South Coast's Rule 1113 no longer contains averaging provisions that are used for compliance purposes. The use of these provisions required detailed reporting and recordkeeping requirements for industry, and intensive AQMD staff resources to review and approve these compliance plans. Today, coatings sold or applied in the South Coast district are required to meet their respective individual coating category ROC limit. Thus, these ROC coating limits are easily translated to being available in Ventura County without the need for resource-intensive averaging provisions that favor larger coating manufacturers with broad product lines necessary to take advantage of averaging allowances.

EPA promulgated the National Volatile Organic Compound Emission Standards for Architectural Coatings (National Architectural Coatings Rule) in 1998. Existing Rule 74.2 is more stringent than the national rule for all coating categories.

Emission Inventory

The quantity of ROC emissions from the use of architectural coatings has been estimated at 0.75 tons of ROC per day from the latest ARB Survey (2013). The emissions reductions from proposed amendments to Rule 74.2 are about 9 percent of the inventory or 22.12 tons ROC per year.

PROPOSED RULE REQUIREMENTS

This section summarizes the major proposed requirements of proposed amendments to Rule 74.2. The proposed new ROC limits are listed in Table 1 and Table 2. In all cases, products are available today that comply with proposed new limits. The major changes are listed below:

1. Lowered the ROC limit for coating categories including: Nonflats; Nonflats-High Gloss; Dry Fog Coatings; Fire Resistive; Floor Coatings; Form-Release Compounds; Aluminum Roof Coatings; Exterior Stains; and Waterproofing Membranes. The limits will go into effect July 1, 2021.

2. Deleted the Specialty Primer, Sealer, and Undercoater Category, and these coatings are now regulated as just Primer, Sealers and Undercoaters.

3. Added the following new specialty coating categories: Interior Stains, Building Envelope Coatings, and Tile and Stone Sealers.

4. A new Default Coating Category at 50 g/l is any specialty coating that is not defined by a specified definition in the rule. This is for clarification purposes, as past versions required undefined coatings to comply with Flat, Nonflat or Nonflat-High Gloss limits.

5. In addition, the proposed amendments would include lower ROC content limits for colorants based on the same limits from the 2019 SCM. Colorant are defined as a concentrated pigment dispersion in water, solvent, and/or binder, that is added to an architectural coating after packaging in sale units to produce a desired color.

In order to more easily understand the applicability of the new coating categories, the important characteristics are summarized as follows:

Building Envelope Coatings: During 2019 SCM development ARB staff determined that this new category, formerly associated with Waterproofing Membranes, was commercially and technologically feasible to reduce ROC content beyond the parent category. Staff proposed Building Envelope Coatings have a reduced VOC limit of 50 grams per liter.

Interior Stains: Although exterior stains can comply with the proposed ROC content limit of 100 grams per liter, interior stains will continue to be regulated at the current ROC content limit of 250 grams per liter. This is an example of creating a new specialty subcategory subject to existing ROC content limits because of the difficulty in complying with proposed new lower limits for the parent coating category (stains).

Tile and Stone Sealers: This new category has the same ROC content limit as the existing limit for concrete/masonry sealers. This additional category is included for clarification purposes.

Table 1. Proposed ROC Limits for Coatings

COATING CATEGORY	CURRENT LIMIT (g/l)[1,2]	PROPOSED LIMIT EFFECTIVE 1/1/2021 (g/l)[3]
DEFAULT		50
Flat Coatings	50	
Nonflat Coatings	100	50
Nonflat-High Gloss	150	50
SPECIALTY COATINGS		
Basement Specialty Coatings	400	
Bituminous Roof	50	
Bituminous Roof Primer	350	
Building Envelope Coating		50
Bond Breaker	350	
Concrete Curing Compounds	350	
Concrete/Masonry Sealers	100	
Driveway Sealers	50	
Dry Fog Coatings	150	50
Faux Finishing Coatings	350	
Fire Resistive Coatings	350	150
Floor Coatings	100	50
Form-Release Compounds	250	100
Graphic Arts-Sign Paints	500	
High Temperature Industrial Maintenance (IM) Coatings	420	
Industrial Maintenance Coatings	250	
Low Solids Coatings[4]	120	
Magnesite Cement Coatings	450	
Mastic Coatings	100	
Metallic Pigmented Coatings	500	
Multi-Color Coatings	250	

[1] The specified limits remain in effect unless revised limits are listed in subsequent columns in the table.

[2] Conversion factor: one pound ROC per gallon (U.S.) = 119.95 grams ROC per liter.

[3] ROC limits, unless otherwise noted, are defined by 74.2.J.67 and 74.2.J.69.

[4] Units for low-solid coatings are grams of ROC per liter (pounds of ROC per gallon) of coating, including water and exempt compounds.

Table 1 (continued) Proposed ROC Limits for Coatings

COATING CATEGORY	CURRENT LIMIT (g/l)[5,6]	PROPOSED LIMIT EFFECTIVE 1/1/2021 (g/l)[7]
Pretreatment Wash Primers	420	
Primers, Sealer & Undercoaters	100	
Reactive Penetrating Sealers	350	
Recycled Coatings	250	
Roof Coatings	50	
Roof Coatings, Aluminum	400	100
Rust Preventative Coatings	250	
Shellacs – Clear	730	
Shellacs – Opaque	550	
Stains: Exterior/Dual Use Interior Stains	250	100 250
Stone Consolidants	450	
Swimming Pool Coatings	340	
Tile and Stone Sealers	100	
Traffic Marking Coatings	100	
Tub & Tile Refinish	420	
Waterproofing Membranes	250	100
Wood Coatings	275	
Wood Preservatives	350	
Zinc-Rich Primers	340	

Table 2. Proposed ROC Limits for Colorants

COLORANT ADDED TO:	PROPOSED LIMIT EFFECTIVE 1/1/2021 (g/l)[7]
Architectural Coating excluding I.M. Coating	50
Solvent-Based I.M. Coating	600
Waterborne IM Coating	50
Wood Coating	600

[5] The specified limits remain in effect unless revised limits are listed in subsequent columns in the table.

[6] Conversion factor: one pound ROC per gallon (U.S.) = 119.95 grams ROC per liter.

[7] ROC limits, unless otherwise noted, are defined by 74.2.J.67 and 74.2.J.69.

COMPARISON OF PROPOSED RULE REQUIREMENTS WITH OTHER AIR POLLUTION CONTROL REQUIREMENTS

H & SC Section 40727.2 requires districts to compare the requirements of a proposed revised rule with other air pollution control requirements. These other air pollution control requirements include federal regulations, Best Available Control Technology (BACT), and any other District's rule that applies to the same equipment or process. Proposed amendments to Rule 74.2 are more stringent than those in the United States Environmental Protection Agency's national rule and are based on the 2019 ARB Suggested Control Measure.

No other District rules have air pollution control requirements that would conflict with Rule 74.2 requirements. Wood coatings applied in a shop or wood product fabrication facility are subject to VCAPCD Rule 74.30, Wood Coatings, instead of Rule 74.2. Similarly, metal products coated in a shop are subject to Rule 74.12, Metal Parts and Products.

Comparison with National Rule

There are many differences between proposed amendments to Rule 74.2 and the national architectural coatings rule, which became effective on September 13, 1999. The national rule only applies to manufacturers and importers of architectural coatings while Rule 74.2 applies to manufacturers, distributors, retailers, and users of architectural coatings. The national rule also has generally less restrictive ROC limits than Rule 74.2. For example, the proposed ROC limits in the national rule for the three largest categories (flats, non-flats, and industrial maintenance coatings) are 250, 380, and 450 grams per liter, respectively. This compares with the ROC limits of 50 grams per liter for flats and nonflats, and 250 grams per liter for industrial maintenance coatings in proposed amendments to Rule 74.2. The national rule also includes 30 additional specialty categories not included in proposed amendments to Rule 74.2. The "national" categories are regulated by one of the existing coating categories in Rule 74.2. Air Resources Board (ARB) staff analyzed these additional national categories and found it was not necessary to add most of them to the 2019 SCM because: there are complying products that may be regulated under other coating categories in existing district rules; they are not architectural coatings; or they are not sold in California. Staff has also analyzed the additional coating categories in the national rule and concluded that for all of the categories except one coating category (Calcimine Recoater Coating), they are not needed because they would be subject to another coating category in the proposed rule or to another district coating rule. Staff has also determined that the Calcimine Recoater Coating is unique to the New England area and, therefore, this category is not necessary for the proposed rule.

Comparison with BACT

SCAQMD Rule 1113 ROC Limits could be Best Available Control Technology (BACT) because it would be the most effective emission control device, emission limit, or technique that has been required or used for this type of equipment. Unlike SCAQMD Rule 1113, the proposed amendments to VCAPCD Rule 74.2 do not include SCAQMD provisions to eliminate the small container exemption. Although small architectural coating containers (1 quart or smaller) represent only one percent of the sales, they represent 20 percent of the ROC emission inventory. For this reason, SCAQMD Rule 1113 may still represent Best Available Control Technology.

Comparison of Air Pollution Control Requirement Elements

Health and Safety Code Section 40727.2.(c) requires the district review the following elements in the comparative analysis between proposed amendments to Rule 74.2 and federal and BACT rules:

- Operating parameters and work practice requirements.
- Monitoring, reporting and recordkeeping requirements, including test methods, format, content and frequency.
- Any other element the district determines warrants review.

The coating (emission) limits in proposed amendments to Rule 74.2 are stated as grams of ROC per liter of coating less water and less exempt organic compounds. These units are identical to the units in both the national rule and SCAQMD Rule 1113.

There are no air pollution control requirements involving operating parameters in any of the rules subject to this analysis. Proposed amendments to Rule 74.2 include a work practice requirement that calls for closing coating and solvent containers when not in use. Similar requirements are found in the national rule and SCAQMD Rule 1113.

There are no monitoring or recordkeeping requirements in proposed amendments to Rule 74.2. Test Methods that have been included in proposed Rule 74.2 are needed to determine ROC content and other coating characteristics. These test methods do not conflict with test methods cited in the national rule or SCAQMD Rule 1113. District staff has determined there are no other air pollution control requirement elements that warrant review in this comparative analysis.

IMPACT OF THE PROPOSED RULE REVISIONS

ROC Emissions Impacts

The emission reduction potential of proposed amendments to Rule 74.2 is estimated at 22.12 tons of ROC per year, or about 9 percent ROC emission reductions from the current emission inventory. This estimate is based on the impact from the ROC content limit reductions for all the affected coating categories and colorants provided in the 2019 ARB SCM Staff Report.

Socioeconomic Impacts Analysis

H & SC Section 40728.5 requires a district to perform an assessment of the socioeconomic impacts before adopting, amending, or repealing a rule that will significantly affect air quality or emission limitations. The district board is required to actively consider the socioeconomic impact of the proposal and make a good faith effort to minimize adverse socioeconomic impacts.

H & SC Section 40728.5 defines "socioeconomic impact" as the following:

1. The type of industry or business, including small business, affected by the rule.
2. The impact of the rule on employment and the economy of the region.
3. The range of probable costs, including costs to industry or business, including small business.
4. The availability and cost-effectiveness of alternatives to the proposed rule.
5. The emission reduction potential of the rule.
6. The necessity of adopting the rule to attain state and federal ambient air standards.

The South Coast Air Quality Management District (SCAQMD) amended their architectural coating Rule 1113 in 1996, 1999, 2001, 2002, 2003, 2004, 2006, 2007, 2011, 2013 and 2016. SCAQMD routinely runs regional economic models to determine socioeconomic impacts of their rule adoptions and did so for their Rule 1113 adoptions.

Traditionally, Ventura County APCD has not used regional economic models in their socioeconomic analyses and is not proposing to do so in this rule development. ARB staff has indicated that it is not necessary for the districts to use a regional economic model to perform the economic analysis for the purpose of adopting amendments to Rule 74.2 because the cost increase associated with the proposed amendments are small in comparison with the regional economy.

Types of Affected Business and Industry Including Small Business

Proposed amendments to Rule 74.2 would potentially impact: (i) industries engaged in manufacturing paint, varnishes, enamels and allied products (SIC 2851); (ii) end users of architectural coatings, including do-it-yourself consumers, painting contractors (SIC 1721) that may be small businesses, and maintenance personnel; and (iii) suppliers, sellers, and solicitors of architectural coatings (SIC 5198, 5231). New construction and maintenance of the following may be impacted by this proposal: buildings; transportation infrastructure; industrial structures such as aboveground tanks; and any stationary structure or appurtenance. At the current time, there are no coating manufacturers operating in the county.

Economic Impacts and Range of Probable Costs

Introduction: Since there are no coating manufacturers in the county, staff has focused on the costs increases that are being passed on to the end user from switching from an oil-based paint to a

waterborne or exempt solvent-based coating. This cost analysis does not take into account the many benefits of using waterborne coatings including greater convenience, an easier cleanup with water, lower odor, and less exposure to hazardous chemicals.

A survey was made of published prices by ARB staff comparing existing high-ROC oil-based coatings in areas subject to the 2007 SCM ROC content limits to the reduced ROC limits found in the 2019 SCM. This survey provides a range of cost-effectiveness (computed in dollars per pound of ROC reduced) depending upon the coating category and the type of solvent used for reformulation purposes.

The cost-effectiveness ranged from a cost savings of $6.51 to costing an additional $19.93 per pound of ROC reduced when switching to a coating compliant with the proposed limits. These cost increases only apply to one and five gallon specialty coating containers since one quart containers would continue to be exempt from rule requirements, and this exemption would mitigate the cost for small users. Finally, there would be no additional costs from proposed amendments for your typical flat and nonflat house paints, since these water-reducible coatings have been widely used in Ventura County for many years.

On the basis of these limited cost increases, staff has determined that proposed amendments to Rule 74.2 will not have an unacceptable adverse impact on employment and the economy in Ventura County.

2019 SCM Analysis: Based on available information, ARB staff estimated that the 2019 SCM ROC standards would result in maximum price increases for future complying coatings of up to 24 percent. The average cost increase for consumers is expected to be 11 percent. The price determinations for complying coatings were supported by information received by them from resin suppliers and coating manufacturers in a product survey.

Conclusion: Although the maximum expected price impacts on consumers are significant, the actual cost impacts are likely to be small because of competitive pricing pressures from existing complying coatings.

Cost to Small Business

The costs of the proposal to small businesses including painting contractors were evaluated based on studies performed by ARB. Staff believes that these studies are applicable to Ventura County because the economic factors affecting architectural coating wholesalers, retailers and painting contractors are similar across areas of California.

ARB staff analyzed the cost impacts to painting contractors in their analysis of amendments to the SCM. Based on data from industry sources, the estimated average annual cost of their ROC limits across the state was $3 million dollars annually to consumers including painting contractors (SIC 1721). According to ARB staff, consumers such as painting contractors can choose not to purchase reformulated coatings, opting to buy existing compliant coatings at current prices. The competition from the existing compliant coatings will constrain any price increases for the reformulated coatings. As a result, manufacturers would have the inability to pass all costs to consumers, which will result in less impact than provided in the analysis.

Conclusion: An estimate of cost impacts to painting contractors in Ventura County was made by assuming that the cost breakdown (consumer vs. painting contractor) is similar to what is found across the state. This is a reasonable assumption because the type and quantity of work performed by painting contractors is expected to be similar to other consumers **on a per capita basis**. Using the data provided by ARB staff, Ventura county would see an annual cost impact to Ventura County area painting contractors of $117,435.

Emission Reduction Potential of the Rule

The emission reduction potential of proposed amendments to Rule 74.2 is estimated at 22.12 tons of ROC per year. This estimate is based on an analysis of current coating emission inventories reduced by approximately 9 percent, which is the estimate of the impact of proposed changes to ROC coating content limits. Table 3 shows the breakdown of ROC emission reductions by coating category.

Table 3 ROC Emission Reductions by Coating Category

COATING CATEGORY	ROC Emission Reductions (Tons/Year)
Aluminum Roof Coatings	2.86
Building Envelope Coatings	0.14
Dry Fog Coatings	0.43
Fire Resistive Coatings	0.29
Floor Coatings	0.14
Form Release Compounds	1.14
Nonflat – High Gloss Coatings	0.29
Nonflat Coatings	5.86
Stains (Exterior/Dual)	6.14
Waterproofing Membranes	1.57
Colorants	2.00
TOTAL	**22.12**[8]

Cost-Effectiveness

ARB's 2019 SCM staff included cost-effectiveness calculations in their staff report. This report includes cost-effectiveness values for each of the major coating categories that are proposed for amendment.

ARB staff estimated $1.85 per pound of ROC reduced for implementing the 2019 SCM over the years 2020-2025 (in 2019 Dollars).

Conclusion: The cost-effectiveness of proposed amendments to Rule 74.2 was calculated based on cost surveys comparing oil-based coating costs to their low-ROC counterparts, either waterborne or exempt solvent-based. The ROC emission reductions are anticipated to be 22.12 tons per year. The cost-effectiveness ranges from -$6.51 to $19.93 per pound of ROC reduced depending upon the coating category and the coating container size and averaged $1.85 per pound of ROC reduced. This is much less than the $15 per pound of ROC reduced that is required for Best Available Control Technology for new stationary sources in the county. Furthermore, small one quart containers will continue to be exempt from this proposal, which will means no cost increases from this proposal for small projects.

Incremental Cost-Effectiveness Analysis

H & SC Section 40920.6(a) requires districts to identify one or more potential control options that achieve at least the same benefit as the proposed rule, assess the cost-effectiveness of those options, and calculate the incremental cost-effectiveness. An alternative that achieves at least the same benefit is the adoption of final ROC limits from South Coast AQMD Rule 1113 including elimination of the small container exemption. Proposed amendments to Rule 74.2 are based strictly on the state SCM. The cost-effectiveness of the ROC limits in Rule 1113 plus the new requirements for small containers per pound adopted in 2016 was estimated at $5.44 per pound of ROC reduced. The incremental cost-effectiveness is calculated by dividing the incremental annualized costs in the district by the incremental annual emission reductions in the district. The incremental cost-effectiveness for this control option is $6.80 per pound of ROC reduced. These calculations are summarized in Table 4.

[8] Total is different due to rounding differences in summary provided by ARB in 2019 SCM Staff Report.

Table 4 Calculation of Incremental Cost-Effectiveness for SCAQMD Small Container Option

I. OPTION CONTROL EFFICIENCY = 33% AND COST-EFFECTIVENESS = $5.44
II. Baseline Inventory = 0.67 tons/day for Ventura County Arch. Coatings
III. Annualized Cost for Proposal = 0.0606 tons/day X $1.85/lb X 365days/year= $81,844
IV. Option Emission Reductions =0.67 tons/day X 33% X 365 days/year = 161,403 lbs/year
V. Option Annualized Cost = Cost-Effectiveness X Emis. Reductions = $5.44 X 161,403 lbs/yr = $878,032
VI. Incremental Annualized Cost = $878,032 - $81,844 = $796,188
VII. Incremental Annual Emis. Reductions =161,403 – 44,240 = 117,163 lbs/yr
VIII. Incremental Cost-Effectiveness = $796,188 / 117,163 = $6.80 per pound

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ENVIRONMENTAL IMPACTS OF METHODS OF COMPLIANCE

California Public Resources Code Section 21159 requires the District to perform an environmental analysis of the reasonably foreseeable methods of compliance. The analysis must include the following information on proposed amendments to Rule 74.2:

(1) An analysis of the reasonably foreseeable environmental impacts of the methods of compliance.
(2) An analysis of the reasonably foreseeable mitigation measures.
(3) An analysis of the reasonably foreseeable alternative means of compliance with the rule or regulation.

Table 4 lists some reasonably foreseeable compliance methods, the environmental impacts of those methods, and measures that could be used to mitigate the environmental impacts. A more detailed environmental analysis will be found in the staff environmental impact report for proposed amendments to Rule 74.2.

Table 5
Environmental Impacts and Mitigations of Methods of Compliance

Compliance Methods (including all reasonably foreseeable alternative means of compliance)	Reasonably Foreseeable Environmental Impacts	Reasonably Foreseeable Mitigation Measures
Reformulation of architectural coatings	Air Quality Impacts: Reformulation may result in the use of toxic materials.	Operators may use reformulated coatings with less or no toxic materials.
	Water Impacts: Improper disposal of coatings may cause water impacts.	Compliance with wastewater discharge standards and waste disposal requirements will mitigate these impacts.
	Human Health Impacts: Coatings may be replaced with products containing more toxic compounds.	Compliance with OSHA safety guidelines (e.g., personal protective equipment, prevention and response, emergency first aid procedures) reduces these impacts.

OTHER FACTORS

Technological Feasibility:

The ROC limits proposed in the amendments to Rule 74.2 are based on ROC limits fully analyzed by ARB in the 2019 SCM. Currently, coatings that meet and exceed the proposed ROC limits are being manufactured and sold in California.

Enforceability

Labeling requirements, reporting requirements, and testing procedures have been included in the proposed rule to increase its enforceability.

Public Acceptability

Staff is soliciting comments, but expects the rule and any associated costs to be acceptable to affected manufacturers and users for the following reasons:

- A three-year sell-through provision will allow suppliers, retailers, and users to deplete existing coating inventories without penalty and without creating a hazardous waste problem.
- High-performance coatings are available now from many companies that comply with the proposed ROC limits.
- Coating price increases as a result of this proposal are not expected to be significant.
- Estimated profitability impacts on coating manufacturers are not expected to be significant.

Environmental Compliance and Review

Proposed amendments to Rule 74.2 strengthen the ROC content limits for architectural coatings. The rule creates new lower standards for specified coating categories. The rule may have a potentially adverse environmental impact. Pursuant to county administrative supplement to state CEQA Guidelines, the District staff will propose reusing the 2009 Environmental Impact Report prepared for the 2020 amendments to Rule 74.2.

Future Technology Assessments

SCAQMD has published Rule 1113 status reports on their website (aqmd.gov) for the following years: 2000, 2001, 2002, 2003, 2004, 2005, 2007, 2011, 2013, and 2016. This review by SCAQMD staff showed all proposed limits are feasible. However, the District's rulemaking process is flexible enough for staff to revisit the rule and to make any appropriate changes to the rule as needed in the future.

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INITIAL STUDY

Ventura County Air Pollution Control District

Proposed Amendments to Rule 74.2, Architectural Coatings

This initial study was prepared in accordance with the Ventura County Initial Study Assessment Guidelines dated April 26, 2011, and the Ventura County Administrative Supplement to State California Environmental Quality Act (CEQA) guidelines dated July 13, 2010, which were prepared under the direction of the Ventura County Board of Supervisors. The Initial Study consists of five sections: Project Description, Initial Study Checklist, Discussion of Responses to Checklist, Mandatory Findings of Significance, and Determination of Environmental Document. The proposed amendments to Rule 74.2 are available and posted on the Ventura County Air Pollution Control District (VCAPCD, or District) website (www.vcapcd.org/rules_division.htm#PublicWorkshops).

The Ventura County Administrative Supplement to State CEQA Guidelines contains a provision that allows agencies or departments to reuse an EIR previously prepared and certified for one project for another project if an Initial Study shows that the previous EIR adequately describes the current project's setting, impacts, alternatives and mitigation measures. A conclusion of this Initial Study is that the 2009 Final EIR certified for the 2010 amendments to Rule 74.2 adequately analyzes the same environmental issues that may result from the proposed 2020 amendments to Rule 74.2 and may be reused for CEQA purposes (CEQA Guidelines Section 15153).

Project Background Information

1. **Project Title:**
   Proposed Amendments to Ventura County Air Pollution Control District (VCAPCD) Rule 74.2, Architectural Coatings

2. **Lead Agency Name and Address:**
   Ventura County Air Pollution Control District
   669 County Square Drive, 2nd Floor
   Ventura, CA 93003

3. **Contact Person and Phone Number:**
   Danny McQuillan, Air Quality Engineer
   805/645-1432

4. **Project Location:**
   The proposed amendments to VCAPCD Rule 74.2 affect architectural coatings that are specified, supplied, sold, or used in all areas of Ventura County.

5. **Project Sponsor's Name and Address:**
   Ventura County Air Pollution Control District
   669 County Square Drive, 2nd Floor
   Ventura, CA 93003

Section A - Project Description:

The CEQA requires the evaluation of the environmental impacts of proposed projects and the consideration of feasible methods to reduce, avoid, or eliminate identified significant adverse environmental impacts. In addition, this law requires that projects carried out by public agencies be subject to the same level of public review and consideration as private projects requiring approval by public agencies. To fulfill the purpose and intent of CEQA, VCAPCD, as the lead agency, is distributing this initial study (IS) for proposed amendments to VCAPCD Rule 74.2, Architectural Coatings. The Initial Study identifies environmental issues that are the focus of a draft Environmental Impact Report (EIR). This document also provides the rationale for excluding those topics that are not expected to have significant environmental impacts as a result of the adoption of amendments to VCAPCD Rule 74.2 in the final EIR document (CEQA Guidelines Section 15128).

a) Objective of the Proposed Project

The proposed amendments to Rule 74.2 are based on the volatile organic compound (VOC) limits established by California Air Resource Board's (CARB) 2019 update to the Suggested Control Measure for architectural coatings (SCM). ARB's 2019 SCM provides suggested volatile organic compound (VOC) limits and other requirements based on existing and currently developing coating technologies, for a number of architectural coating categories including: flats; nonflats; nonflat–high gloss; building envelope; dry fog; fire proof; floor; form release; primers, sealers and undercoats; aluminum roof coatings; waterproofing sealers; exterior stain coatings; and tile and stone sealers. All of the proposed new VOC limits would become effective on January 1, 2021. The revised Rule 74.2 would apply to any person who supplies, sells, offers for sale, or manufactures any architectural coating for use within the District, as well as any person who applies or solicits the application of any architectural coating within the District. Appendix A presents the proposed revisions to Rule 74.2 in strikeout/underline format. The proposed amendments to Rule 74.2 will be posted on the District's website at www.vcapcd.org/rules_division.htm#PublicWorkshops.

b) Background and Reason for the Project

Ventura County exceeds the state and federal standards for ozone and the state standard for particulate matter. Ground level ozone is a secondary pollutant formed by photochemical reactions between oxides of nitrogen and reactive organic compounds (ROC and synonymous with VOC) in the presence of sunlight. The objective of the proposed amendments to Rule 74.2 is to reduce the amount of ROC emissions being released into the atmosphere, which originate from the organic solvent portion of the coating. On February 14, 2017, the Ventura County Air Pollution Control Board adopted the 2016 Air Quality Management Plan, which contains measures needed to meet the federal ambient air quality standards including Control Measure R-333-2017, Architectural Coatings. The estimated ROC emission reductions from the adoption of proposed amendments to Rule 74.2 are 0.13 tons per day.

In addition, Ventura County is required to meet California Clean Air Act requirements. Air districts that are nonattainment for the state ozone standard, such as Ventura County, are required by the California Health and Safety Code to adopt All Feasible Measures (H&SC 40914) and to develop rules to implement their plans for attaining state ambient air quality standards (H&SC 40920) for the serious non-attainment areas. The state guidelines for the determination of feasible measures require the review of SCM prepared by a state agency like CARB, which have been considered in the proposed rule amendments. Adoption of the proposed Rule 74.2 amendments would fulfill the District's commitment to its AQMP and responsibility to continue protecting human health and the environment in Ventura County.

c) Summary of Environmental Impact Analysis

In 2019, CARB updated the SCM for architectural coatings from the previous update in 2007. Both SCMs went through the CEQA process by providing an Environmental Analysis (EA) in an effort to facilitate use of the SCM by local air districts such as VCAPCD. It was noted by CARB that their EA serves as a substitute document equivalent to an addendum to the Final Program Environmental Impact Report (PEIR) for the 2000 SCM (State Clearinghouse – SCH No. 99062093) which explains CARB's determination that no additional environmental analysis is required for the proposed SCM in 2007 and 2019. The 2000 PEIR to the architectural coatings SCM concluded that no significant environmental impacts would occur as a result of air districts adopting the state SCMs. The PEIR also went on to analyze claims of increased usage volume due to lower ROC limits by reviewing paint formulations, such as reactivity and ozone-formation contribution, and performance of water-based coatings vs solvent-based coatings. The PEIR analysis determined solvent-based coatings are over two times more reactive for forming ozone than water-based products and lowering ROC limits in coatings would not result in any adverse environmental impacts and would have a net air quality benefit.

VCAPCD also prepared and certified a Final EIR for the 2009/2010 Proposed amendments to Rule 74.2 (SCH No. 2001061106), which looked at the environmental impacts of that project including analysis of the following six potential impacts of the latest amendments: air quality, water quality, public services, transportation/circulation, solid waste/hazardous waste, and hazardous substances. It is important to note that the 2009 Final EIR took a similar approach to analyses and references from CARB's 2000 SCM PEIR, pursuant to CEQA Guidelines Sections 15150 and 15168. VCAPCD staff concluded that there will be no new significant adverse impacts from any of the aforementioned six potential impacts. In addition, staff determined that no adverse impacts of the following additional environmental resources will result from implementing the proposed amendments to VCAPCD Rule 74.2:

- General Plan Goals and Policies
- Land Use and Planning
- Water Resources
- Agricultural Resources
- Seismic and Geologic Hazards
- Biological Resources

- Energy and Mineral Resources
- Noise
- Aesthetics
- Cultural Resources
- Recreation
- Aviation Hazards
- Utilities
- Education

Since this review, additional areas of investigation have been required in the environmental review process. Staff has determined that the following environmental resources experience no adverse impacts as a result from implementing the proposed amendments to VCAPCD Rule 74.2:

- Greenhouse Gas Emissions
- Wildfire
- Tribal Cultural Resources

Numerous air districts across the state have also determined no significant environmental impacts from lowering ROC limits in architectural coatings and have rightfully elected to claim the CEQA Categorical Exemption of Actions by Regulatory Agencies for the Protection of the Environment (15308), as also noted by CARB in their PEIR. However, VCAPCD chooses to provide an environmental analysis for consistency with the District's past 74.2 rule amendments process. Because both the District 2009 FEIR and the CARB 2019 EA for architectural coatings reference the same potential environmental impacts identified in the 2000 PEIR for CARB's SCM, VCAPCD, as the lead agency, has elected to reuse the 2009 EIR as the draft EIR for this project. This action is allowed under the Ventura County Supplement to state CEQA guidelines and CEQA Guidelines section 15153, if the previous EIR adequately describes the current project's setting, impacts, alternatives and mitigation measures and no new significant impacts or mitigation measures are identified, provided an Initial Study is conducted.

6. **Other Agencies Whose Approval is Required:**
   No other agencies have discretionary authority over this project.

7. **Project Compatibility with Existing Zones and Plans:**
   Adoption of this rule will not affect any land use zones or plans.

8. **Name of Person Who Prepared Initial Study:** Stan Cowen, Air Quality Engineer (retired), Danny McQuillan, Air Quality Engineer, Nicole Collazo, Air Quality Specialist

SECTION B
INITIAL STUDY CHECKLIST*
PROJECT NAME: Proposed Amendments to APCD Rule 74.2, Architectural Coatings

ISSUE	ISSUE AREA	PROJECT IMPACT DEGREE OF EFFECT**				CUMULATIVE IMPACT DEGREE OF EFFECT**			
		N	LS	PS-M	PS	N	LS	PS-M	PS
GENERAL:	1. GENERAL PLAN ENVIRONMENTAL GOALS AND POLICIES:	X				X			
LAND USE:	2. LAND USE								
	a. COMMUNITY CHARACTER:	X				X			
	b. HOUSING:	X				X			
	c. GROWTH INDUCEMENT:	X				X			
RESOURCES:	3. AIR QUALITY								
	a. REGIONAL:				X				X
	b. LOCAL:				X				X
	c. GREENHOUSE GAS EMISSIONS	X				X			
	4. WATER RESOURCES								
	a. GROUND WATER QUANTITY:	X				X			
	b. GROUND WATER QUALITY:		X				X		
	c. SURFACE WATER QUANTITY:	X				X			
	d. SURFACE WATER QUALITY:		X				X		
	5. MINERAL RESOURCES								
	a. AGGREGATE:	X				X			
	b. PETROLEUM:	X				X			
	6. BIOLOGICAL RESOURCES								
	a. ENDANGERED, THREATENED, OR RARE SPECIES:	X				X			
	b. WETLAND HABITAT:	X				X			
	c. COASTAL HABITAT:	X				X			
	d. MIGRATION CORRIDORS:	X				X			
	e. LOCALLY IMPORTANT SPECIES/ COMMUNITIES:	X				X			
	7. AGRICULTURAL RESOURCES								
	a. SOILS:	X				X			
	b. WATER:	X				X			
	c. AIR QUALITY/MICRO-CLIMATE:	X				X			
	d. PESTS/DISEASES:	X				X			
	e. LAND USE INCOMPATIBILITY:	X				X			
	8. VISUAL RESOURCES								
	a. SCENIC HIGHWAY:	X				X			
	b. SCENIC AREA/FEATURE:	X				X			
	9. PALEONTOLOGICAL RESOURCES:	X				X			
	10. CULTURAL RESOURCES								
	a. ARCHAEOLOGICAL:	X				X			
	b. HISTORICAL:	X				X			
RESOURCES:	c. ETHNIC, SOCIAL OR RELIGIOUS:	X				X			
	d. TRIBAL	X				X			

ISSUE	ISSUE AREA	PROJECT IMPACT DEGREE OF EFFECT**				CUMULATIVE IMPACT DEGREE OF EFFECT**			
		N	LS	PS-M	PS	N	LS	PS-M	PS
(CONT'D)	11. ENERGY RESOURCES:	X				X			
	12 COASTAL BEACHES & SAND DUNES:	X				X			
HAZARDS:	13. SEISMIC HAZARDS								
	a. FAULT RUPTURE:	X				X			
	b. GROUND SHAKING:	X				X			
	c. TSUNAMI:	X				X			
	d. SEICHE:	X				X			
	e. LIQUEFACTION:	X				X			
	14. GEOLOGIC HAZARDS								
	a. SUBSIDENCE:	X				X			
	b. EXPANSIVE SOILS:	X				X			
	c. LANDSLIDES/MUDSLIDES:	X				X			
	15. HYDRAULIC HAZARDS								
	a. EROSION/SILTATION:	X				X			
	b. FLOODING:	X				X			
	16. AVIATION HAZARDS:	X				X			
	17. FIRE HAZARDS AND WILFIRE:	X				X			
	18. HAZARDOUS MATERIALS/WASTE								
	a. HAZARDOUS EMISSIONS:		X				X		
	b. BELOW-GROUND HAZARDOUS MTLS.:	X				X			
	c. HAZARDOUS WASTE:		X				X		
	19. NOISE AND VIBRATION:	X				X			
	20. GLARE:	X				X			
	21. Public Health:	X				X			
PUBLIC FACILITIES/ SERVICES:	22. TRANSPORTATION/CIRCULATION								
	a. PUBLIC ROADS AND HIGHWAYS								
	(1) LEVEL OF SERVICE:	X				X			
	(2) SAFETY/DESIGN:	X				X			
	(3) TACTICAL ACCESS:	X				X			
	b. PRIVATE ROADS AND DRIVEWAYS								
	(1) SAFETY/DESIGN:	X				X			
	(2) TACTICAL ACCESS:	X				X			
	c. PEDESTRIAN/BICYCLE								
	(1) PUBLIC FACILITIES:	X				X			
	(2) PRIVATE FACILITIES:	X				X			
	d. PARKING:	X				X			
	e. BUS TRANSIT:	X				X			
	f. RAILROADS:	X				X			
	g. AIRPORTS:	X				X			
	h. HARBORS:	X				X			
	i. PIPELINES:	X				X			
	23. HYDROLOGY AND WATER SUPPLY								
PUBLIC FACILITIES	a. QUALITY:	X				X			
	b. QUANTITY:	X				X			

ISSUE	ISSUE AREA	PROJECT IMPACT DEGREE OF EFFECT**				CUMULATIVE IMPACT DEGREE OF EFFECT**			
		N	LS	PS-M	PS	N	LS	PS-M	PS
SERVICES:	c. FIRE FLOW:	X				X			
(CONT'D)	**24. WASTE TREATMENT/DISPOSAL**								
	a. INDIVIDUAL SEWAGE DISPOSAL SYSTEM:	X				X			
	b. SEWAGE COLLECTION/TREATMENT FACILITIES:	X				X			
	c. SOLID WASTE MANAGEMENT:		X				X		
	d. SOLID WASTE FACILITIES:	X				X			
	25. UTILITIES								
	a. ELECTRIC:	X				X			
	b. GAS:	X				X			
	c. COMMUNICATION:	X				X			
	26. FLOOD CONTROL/DRAINAGE								
	a. FLOOD CONTROL DISTRICT FACILITY:	X				X			
	b. OTHER FACILITIES:	X				X			
	27. LAW ENFORCEMENT/EMERGENCY SVS								
	a. PERSONNEL/EQUIPMENT:	X				X			
	b. FACILITIES:	X				X			
	28. FIRE PROTECTION								
	a. DISTANCE/RESPONSE TIME:	X				X			
	b. PERSONNEL/EQUIPMENT/FACILITIES:	X				X			
	29. EDUCATION								
	a. SCHOOLS:	X				X			
	b. LIBRARIES:	X				X			
	30. RECREATION								
	a. LOCAL PARKS/FACILITIES:	X				X			
	b. REGIONAL PARKS/FACILITIES:	X				X			
	c. REGIONAL TRAILS/CORRIDORS:	X				X			

* Analyzing:
a) changes resulting from amending APCD Rule 74.2
b) changes with respect to circumstances
c) new information and impacts as of State CEQA Guidelines 2019 Update

** Explanation: Degree of Effect
N = No Effect
LS = Less Than Significant Effect
PS-M = Potentially Significant-Impact Mitigated
PS = Potentially Significant Impact

D.	MANDATORY FINDINGS OF SIGNIFICANCE BASED ON THE INFORMATION CONTAINED WITHIN SECTIONS B AND C:	YES/ MAYBE	 NO
1.	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?		X
2.	Does the project have the potential to achieve short-term, to the disadvantage of the long-term, environmental goals? (A short-term impact on the environment is one that occurs in a relatively brief, definitive period of time while long term impacts will endure well into the future.)		X
3.	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 view in connection with the effects of past projects, the effects of other current projects, and the effect of probable future projects. (Several projects may have relatively small individual impacts on two or more resources, but the total of those impacts on the environment is significant.)		X
4.	Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?		X

E.	DETERMINATION OF ENVIRONMENTAL DOCUMENT
	ON THE BASIS OF THIS INITIAL EVALUATION:
☐	I find the proposed project could not have a significant effect on the environment, and a Negative Declaration should be prepared.
☐	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measure(s) described in Section C of the Initial Study will be applied to the project. A Mitigated Negative Declaration should be prepared.
☐	I find the proposed project, individually or cumulatively, may have a significant effect on the environment and an Environmental Impact Report is required.
☐	I find that the proposed project may have a "potentially significant impact" or "potentially significant unless mitigated " 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 analyses as described on attached sheets. An Environmental Impact Report is required, but it must analyze only the effects that remain to be addressed.
☒	I find that the proposed project could have a significant effect on the environment. Because all potentially significant effects have been analyzed adequately in an earlier EIR pursuant to applicable standards, the earlier EIR will be reused as the draft EIR for this project.

Dated: 7/8/2020

VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT

Air Pollution Control Officer

SECTION C
RESPONSES TO THE INITIAL STUDY CHECKLIST

ISSUE

1. General Plan Environmental Goals and Policies

The provisions of the amendments to APCD Rule 74.2 are fully consistent with the goals and policies of the Ventura County General Plan to improve the environment of Ventura County.

2. Land Use (a-c)

APCD Rule 74.2 does not have any provisions that would impact community character, increase demand for housing, remove impediments to growth in the county, or result in a significant loss of agricultural land. There are no provisions in APCD Rule 74.2 that would affect land use plans, policies, or regulations. It is also expected that APCD Rule 74.2 will not affect infrastructure development or require changes to existing zone designations. Land use and other planning considerations are determined by local governments and no land use or planning requirements will be altered by APCD Rule 74.2. There are no provisions in APCD Rule 74.2 that would induce substantial population growth in an area, nor displace a substantial number of existing housing or people.

3. Air Quality (a and b)

According to CARB and District staff, the proposed amendments to Rule 74.2 will improve air quality by reducing ROC emissions, which are ozone precursors. Based on the most recent CARB survey of architectural coatings sold in the state, the estimated ROC emission reductions in Ventura County would be 0.134 tons per day. However, previous comments from the paint manufacturing industry dispute the air quality benefits resulting from the previously adopted rule amendments, which are similar to those proposed at this time. These comments can be categorized into seven areas of potential concern. These are:

The use of lower-ROC coatings will result in a thicker film coating.

Industry comments have asserted that low-VOC coatings are formulated with high-solids contents that are difficult to apply without leaving a thick film on the substrate. A thicker film means that more paint is needed to cover a given surface area resulting in higher ROC emissions. Review of manufacturer's product data sheets of trade coatings shows currently available low-ROC coatings are mainly waterborne coatings that are not necessarily formulated with higher solids contents. Industrial maintenance coatings may have higher solids contents, but these coatings are normally applied by the professional painters using high performance spray equipment. Although high-solids, low-ROC coatings are being used, the recommended film thickness for these coatings is similar to that for higher-ROC coatings. Since these coatings are commonly applied with more than one coat to a specified mil thickness, the use of higher solids coatings will reduce the number of coats needed and result in less coating material applied and fewer ROC emissions.

The use of lower-ROC coatings will result in excessive thinning of the coating.

Increased ROC emissions from excessive thinning is not expected because many coatings, as applied, already comply with the new proposed ROC content limits. Additionally, most of the compliant coatings are waterborne, which may be only be thinned with water, which is not a pollutant. Since the coating ROC content limits in the proposed amendments are expressed in terms of the manufacturer's maximum thinning recommendation, then use of excessive thinning is prohibited by the rule.

The use of lower-ROC coatings requires the use of additional primer for proper adhesion to the substrate.

Manufacturer's product data sheets show that substrate preparation for lower-ROC coatings is similar to higher-ROC coatings. Lasting coating adhesion is more a function of proper surface preparation rather than the type of coating used. Lower-ROC coatings have performed well in tests for hardness, adhesion and resistance to stains, chemicals and corrosion without the need for additional priming.

Lower-ROC coatings will require the use of more coats.

Industry representatives have claimed that more coats of lower-ROC coatings will be required to achieve adequate coverage. High quality coatings made for durability and coverage may be manufactured in low-ROC formulations. It is the quality of the resins and pigments that determine hiding, not whether it is solvent or water-based. Product data sheets provided by the manufacturer listing coverage rates do not indicate that lower-ROC architectural coatings provide less coverage than higher-ROC coatings. Given high quality coatings, lower-ROC and higher-ROC coatings have comparable coverage and performance. Thus, more coats will not be needed for the lower-ROC coatings.

The use of lower-ROC coatings will require more frequent recoating, touch-up, and repair work.

Technical data sheets on lower-ROC coatings indicate that durability characteristics similar to or better than higher-ROC coatings. Low-ROC architectural coatings have been used successfully for many years and are considered to be as durable and long lasting as higher-ROC coatings. Therefore, the need for recoats, touch-up, and repair work on lower-ROC coating jobs is not expected.

The use of lower-ROC coatings will result in product substitution by end-users.

There are currently available low-ROC architectural coatings with performance characteristics comparable to higher-ROC architectural coatings. As a result, end-users do not need to substitute products from a higher-ROC coating category. VCAPCD Rule 74.2 prohibits the application of certain coatings in specific settings, and performance requirements for certain jobs, such as in an industrial maintenance setting, would discourage users from substituting coatings that would not

perform as well. The coating characteristics of products within a given architectural coating category may differ from those of another category making the ability to successfully substitute products difficult and less likely. VCAPCD Rule 74.2 requires that when a coating can be used in more than one coating category, the lower limit of the two categories is applicable.

The use of lower-ROC coatings may result in the use of coatings with higher reactivity.

APCD and CARB staff agree that some components in higher-ROC coatings, such as mineral spirits, may have a lower reactivity than some components in lower-ROC coatings, such as propylene glycol. However, the impact on ozone formation and air quality depends on the both weighted overall reactivity of all the components in a coating and the actual mass percentage of ROC in the coating. Higher-ROC coatings have a blend of organic solvents, some with low reactivity, but several solvents, such as toluene, xylene, and ethylene glycol ether, which have MIR values ranging from 3.78 to 7.45, which is two to three times higher than the MIR for propylene glycol. Therefore, the weighted reactivity of a higher-ROC coating may be higher than the reactivity of a lower-ROC coating.

Typically, waterborne coatings that are required to meet a Regulatory ROC limit have much fewer ROC emissions because the ROC content is calculated by subtracting the water from both the volatiles and the coating volume. For example, a waterborne coating meeting a regulatory ROC limit of 350 grams per liter may have no more than 120 grams of ROC content to be compliant. Therefore, the much lower actual mass of ROC content in lower-ROC waterborne coatings compared to higher-ROC content coatings overwhelms any potential lower reactivity in higher-ROC coatings. In the SCM, ARB staff concluded that the total reactivity of the lower-ROC architectural coatings will be less than the reactivity of the higher-ROC architectural coatings.

3. Air Quality (c)

Greenhouse gases (GHG) are gases that trap heat in the atmosphere, including, but not limited to carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF6). Water vapor, although it is a gas that traps heat, is excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation. GHGs are emitted both naturally and anthropogenically (human-caused). Of these GHGs, CO2 and CH4 are emitted in the largest amounts from anthropogenic activities, such as the combustion of fossil fuel resources and organic processing and storage operations, respectively.

The proposed amendments to Rule 74.2 are not expected to contribute to the increase of the greenhouse gases mentioned above and thus would not directly or indirectly contribute to climate change. The rule amendment proposed is for the reduction of ROC content in architectural coatings used and sold within Ventura County. ROC is considered to be a criteria pollutant and not included in the state GHG-climate goals. Further, the rule amendment would not indirectly cause an increase of mobile source emissions such as supplier delivery trucks and contractor vehicle use, as there should be no increase in product demand or usage as application efficiency would not change.

4. Water Resources (b and d)

The State Water Resources Control Board (SWRCB) and the Los Angeles Regional Water Quality Control Board (LARWQCB) are responsible for protecting surface and groundwater supplies in Ventura County, regulating waste disposal, and requiring cleanup of hazardous conditions. In particular, the SWRCB establishes water-related policies and approves water quality control plans, which are implemented and enforced by the LARWQCB. These agencies also regulate discharges to State waters through federal National Pollution Discharge Elimination System (NPDES) permits. Discharges to publicly owned treatment works (POTW) are regulated through federal pretreatment requirements enforced by the POTWs.

The SCM and proposed amendments to Rule 74.2 are not expected to adversely impact water quality since the use of less toxic exempt solvents is expected to result in equivalent or less water quality impacts than currently used solvents. Water resources impacts are considered significant if they cause changes in the course of water movements or of drainage or surface runoff patterns; substantially degrade water quality; deplete water resources; significantly increase toxic inflow to public wastewater treatment facilities; or interfere with groundwater recharge efforts. Since no significant adverse impacts are anticipated, no mitigation measures are necessary.

The EIR performed in 2009 indicated that the increased water demand associated with the implementation of the SCM is de minimus. Adopting the 2020 amendments to VCAPCD Rule 74.2 is also not expected to adversely impact water quality because the use of exempt solvents is expected to result in equivalent or lesser water quality impacts than currently used solvents because the exempt solvents are less toxic. Further, because currently available compliant coatings are already based on waterborne technology, no additional water quality impacts from these coatings are expected. Finally, adopting the 2020 amendments to VCAPCD Rule 74.2 will not promote the use of compliant coatings that are formulated with hazardous solvents that could impact water quality.

5. Mineral Resources (a-b)

VCAPCD Rule 74.2 is not expected to adversely impact mineral resources because it will neither limit access to, nor increase demand for, such materials. There are no provisions in VCAPCD Rule 74.2 that would result in the loss of availability of known mineral resources or a locally important mineral resource recovery site that would be of value to the region and residents of the county.

6. Biological Resources (a-e)

VCAPCD Rule 74.2 does not include any provision that would impact biological resources. The adoption of VCAPCD Rule 74.2 is not expected to adversely affect existing plant or animal species or communities, unique or endangered plant or animal species, or agricultural crops. Further, improvements in Ventura County's air quality expected from VCAPCD Rule 74.2 are expected to provide health benefits to plant and animal species.

7. Agricultural Resources (a-e)

VCAPCD Rule 74.2 does not include any provision that would adversely impact agricultural resources. Because many agricultural crops are sensitive to air pollution, VCAPCD Rule 74.2 should benefit agricultural resources in Ventura County by improving regional air quality.

8. Visual Resources (a-b)

VCAPCD Rule 74.2 does not include any provision that would adversely impact visual resources. The adoption of VCAPCD Rule 74.2 will not affect aesthetics. The reduction of ROC emissions from the new rule requirements will reduce ambient ozone that may cause corrosion on historic buildings synergistically with other pollutants.

9. Paleontological Resources

VCAPCD Rule 74.2 does not include any provision that would adversely impact paleontological resources.

10. Cultural Resources (a-d)

There will be no impact on any cultural, historic, or tribal resources from the adoption of VCAPCD Rule 74.2. Further, improvements in air quality from VCAPCD Rule 74.2 are expected to lessen the damage to historic sites from the effects of ozone pollution.

11. Energy Resources

VCAPCD Rule 74.2 does not include any provisions that would adversely impact energy resources or change the current consumption and efficiency of energy resources

12. Coastal Beaches and Sand Dunes

VCAPCD Rule 74.2 does not include any provisions that would adversely impact coastal beaches or sand dunes.

13. Seismic Hazards (a-e)

VCAPCD Rule 74.2 does not include any provisions that would result in seismic hazard impacts.

14. Geologic Hazards (a-c)

VCAPCD Rule 74.2 does not include any provisions that would result in geologic hazard impacts.

15. Hydraulic Hazards (a-b)

VCAPCD Rule 74.2 does not include any provision that would result in hydraulic hazard impacts.

16. Aviation Hazards

VCAPCD Rule 74.2 does not include any provision that would increase aviation hazards.

17. Fire Hazards and Wildfire

VCAPCD Rule 74.2 does not include any provision that would increase the potential for fire hazards or wildfire risks. The proposed amendments will encourage the use of waterborne coatings in place of much more flammable solvent-based coatings. The proposed rule amendment will not impair an adopted emergency response plan or evacuation plan for wildfire events in the county.

18. Hazardous Emissions/Waste Disposal (a and c)

According to the rule staff report, future compliant coatings will contain less hazardous materials compared to solvent-based coatings, resulting in lower hazardous emissions. The human health impact performed in the staff report examined the potential increased long-term (carcinogenic and chronic) and short term (acute) human health impacts associated with the use of various replacement solvents in compliant coating formulations. It was concluded that the general public and coating applicators would not be exposed to either long-term or short-term health risks from adopting the 2020 proposed amendments to VCAPCD Rule 74.2.

The Department of Toxic Substance Control (DTSC) is the lead agency in California for hazardous waste management. DTSC enforces California's hazardous waste control laws, issues permits to hazardous waste facilities, and mitigates contaminated hazardous waste sites. In California, leftover liquid waterborne and solvent-based coatings are considered a hazardous waste and must be disposed of with a facility that is registered with DTSC.

After collection at household hazardous waste collection sites, waterborne coatings may be consolidated for reuse. Reuse of waterborne coatings that are in good condition may effectively reduce the volume of coating disposal by 50 percent or more. Post-consumer paints can also be reprocessed as high quality recycled paints. Some communities use this consolidated waterborne coatings in anti-graffiti campaigns. Because waterborne paint is not considered a household hazardous waste when dried, small quantities may be disposed in municipal solid waste landfills.

Solvent-based coatings are generally not good candidates for reuse because of the complexity and incompatibility of the formulations. Cement kilns can use waste solvent-based paints as a fuel source provided they have a sufficient BTU value. If the collected solvent-based coatings do not qualify as a fuel, they must be disposed of as a hazardous waste through a licensed contractor. The use of solvent-based coatings require the use of cleaning solvents, such as mineral spirits, paint thinner or turpentine, for cleanup and thinning. This may generate additional hazardous waste for disposal. In addition, these cleaning solvents are highly flammable, which may create a fire hazard if they are stored or used improperly.

The solid waste/hazardous waste analysis performed in the staff report examined the increased

disposal of compliant coatings due to the possibility of shorter shelf life or pot lives or lesser freeze/thaw capabilities. Adverse solid waste/hazardous waste impacts associated with these potential characteristics are expected to be less than significant. Moreover, the proposed amendments to VCAPCD Rule 74.2 includes a three year sell-through provision that allows coatings that are manufactured prior to the new effective date of the new ROC coating limit to be sold and used for up to three years after the effective date. In this way, VCAPCD Rule 74.2 will not create hazardous waste from existing non-compliant coatings.

19. Noise and Vibration:

VCAPCD Rule 74.2 does not include any provisions that would cause noise or vibration.

20. Glare:

APCD Rule 74.2 does not include any provision that would increase glare.

21. Public Health

Proposed amendments to VCAPCD Rule 74.2 are designed to protect public health by reducing emissions of reactive organic compounds, a precursor to ambient ozone formation.

22. Transportation and Circulation (a-i)

VCAPCD Rule 74.2 does not include any provisions that would adversely impact roads, vehicles, trains, buses, or other transportation-related entities.

23. Water Supply (a):

VCAPCD Rule 74.2 does not include any provisions that would adversely impact water supply.

24. Waste Treatment/Disposal (a-c)

VCAPCD Rule 74.2 does not include any provision that would adversely impact waste treatment/disposal facilities. Existing state and local regulations governing waste treatment and disposal will ensure that there are no significant impacts.

25. Utilities (a-c)

There are no provisions in the proposed amendments to VCAPCD Rule 74.2 that would affect existing communication systems, sewer or septic tanks, regional water treatment or distribution facilities, or any other utilities.

26. Flood Control/Drainage (a-b)

APCD Rule 74.2 does not include any provision that would adversely impact flood control or

drainage facilities.

27. Law Enforcement/Emergency Services (a-b)

VCAPCD Rule 74.2 does not include any provision that would adversely impact law enforcement or emergency services.

28. Fire Protection (a-b):

VCAPCD Rule 74.2 does not include any provision that would adversely impact fire protection impacts.

29. Education (a-b):

VCAPCD Rule 74.2 does not include any provision that would adversely impact education.

30. Recreation (a-c):

VCAPCD Rule 74.2 does not include any provision that would adversely impact on recreation or recreation facilities.

Section D
Discussion of Mandatory Findings of Significance (1-4)

There are no provisions in VCAPCD Rule 74.2 that would have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, or impact in any manner any rare or endangered plant or animal. Nor would this rule impact or eliminate any important examples of the major periods of California history or prehistory.

VCAPCD Rule 74.2 does not have the potential to achieve short term, to the disadvantage of long-term goals. This project also does not have impacts which are individually limited but cumulatively considerable.

Because the analysis of the potentially significant impacts on air quality discussed in Section 3 (Air Quality) is very similar to the analysis in the 2009 EIR for the adoption of the 2010 amendments to VCAPCD Rule 74.2, it is proposed to reuse the 2009 EIR as the draft EIR for this project, pursuant to CEQA State Guidelines section 15153

LETTER A1

NAHC HEADQUARTERS
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Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

STATE OF CALIFORNIA — Gavin Newsom, *Governor*

NATIVE AMERICAN HERITAGE COMMISSION

8/10/2020
Governor's Office of Planning & Research
Jul 10 2020
STATE CLEARINGHOUSE

July 9, 2020

Danny McQuillan
Ventura County Air Pollution Control District
669 County Square Drive, 2nd Floor
Ventura, CA 93003

Re: 2020070158, Proposed Amendments to VCAPCD Rule 74.2, Architectural Coatings Project, Ventura County

Dear Mr. McQuillan:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE). A1-1

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply. A1-2

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments. A1-3

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

Responses to NOP Comments, cont'd.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- **a.** A brief description of the project.
- **b.** The lead agency contact information.
- **c.** Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- **d.** A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

A1-4

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

- **a.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

A1-5

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- **a.** Alternatives to the project.
- **b.** Recommended mitigation measures.
- **c.** Significant effects. (Pub. Resources Code §21080.3.2 (a)).

A1-6

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

- **a.** Type of environmental review necessary.
- **b.** Significance of the tribal cultural resources.
- **c.** Significance of the project's impacts on tribal cultural resources.
- **d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

A1-7

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

A1-8

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- **a.** Whether the proposed project has a significant impact on an identified tribal cultural resource.
- **b.** Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

A1-9

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:

a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or

b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

A1-10

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

A1-11

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

A1-12

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

a. Avoidance and preservation of the resources in place, including, but not limited to:

i. Planning and construction to avoid the resources and protect the cultural and natural context.

ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:

i. Protecting the cultural character and integrity of the resource.

ii. Protecting the traditional use of the resource.

iii. Protecting the confidentiality of the resource.

c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).

e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).

f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

A1-13

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.

b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.

c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

A1-14

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
    a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
    b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/.

A1-15

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
    a. If part or all of the APE has been previously surveyed for cultural resources.
    b. If any known cultural resources have already been recorded on or adjacent to the APE.
    c. If the probability is low, moderate, or high that cultural resources are located in the APE.
    d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
    a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.

A1-16

b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

A1-16 cont'd

3. Contact the NAHC for:
   a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
   b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

A1-17

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
   a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
   b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
   c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

A1-18

If you have any questions or need additional information, please contact me at my email address: Nancy.Gonzalez-Lopez@nahc.ca.gov.

Sincerely,

Nancy Gonzalez-Lopez
Cultural Resources Analyst

cc: State Clearinghouse

Letter A1	Native American Heritage Commission (NAHC) Nancy Gonzalez-Lopez, Cultural Resource Analyst July 9, 2020

A1-1 The comment is to explain the CEQA process in the environmental impact area of historical resources. The project's Initial Study did not identify significant impacts for historical resources and an EIR was prepared to address potential significant impacts to air quality, water quality, public services, transportation/circulation, solid waste/hazardous waste, and hazardous substances. In the area of Historical Resources, the Initial Study concluded that lowering maximum allowable Reactive Organic Compounds (ROC) concentration in architectural coating materials will reduce ozone pollution which may help in preserving the historical resources.

A1-2 The comment is explaining the 2014 CEQA amendments to incorporate AB 52 and SB 18 and project applicability. The District will comply with applicable provisions of AB 52 and SB 18. The project is not subject to the federal National Environmental Policy Act (NEPA).

A1-3 The comment is recommending consultation with the California Native tribes within the affected geographical area in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. The project is administrative in nature and is for the amendment of an existing prohibitory rule to reduce maximum allowable ROCs in paints. The project is not expected to directly or indirectly affect the preservation and discovery of Native American human remains. However, District staff have contacted the Native American Heritage Commission to seek guidance and to ensure compliance with AB 52 and SB 18.

A1-4 The comment is information regarding notification requirements of AB 52. According to the statement, notification is required if there is a designated contact or a "culturally affiliated California Native American tribes (have) requested notice". Notice was not requested by any culturally affiliated California Native American tribe when the project was deemed complete at the time the NOP was published. However, District staff have contacted the Native American Heritage Commission and submitted a Native American Tribal Consultation Form in order to begin the consultation process, if requested and applicable.

A1-5 The comment is information regarding consultation requirements of AB 52. The District has not received a request by a culturally affiliated California Native American tribe for consultation. However, District staff have contacted the Native American Heritage Commission and submitted a Native American Tribal Consultation Form in order to begin the consultation process, if requested and applicable.

A1-6 The mandatory topics of consultation identified are applicable if a tribe has requested consultation. To date, no California Native American tribe has contacted the District for consultation of the project. However, District staff submitted a Native American Tribal Consultation Form to the NAHC in order to begin the consultation process, if applicable.

A1-7 The comment is informational in nature. The District will be in contact with local Native American tribe(s) and will begin the consultation process, if requested and applicable.

A1-8 The District will ensure that any confidential information discussed during the consultation process will not be included in the environmental document or otherwise disclosed by the District or any other public agency to the public. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents , in writing, to the disclosure of some or all of the information to the public.

A1-9 The project's Initial Study did not identify significant impacts for tribal cultural resources and an EIR was prepared to address potential significant impacts to air quality, water quality, public services, transportation/circulation, solid waste/hazardous waste, and hazardous substances. As such, no mitigation measures of feasible alternatives for native cultural resources were identified.

A1-10 The District will be in contact with local Native American tribe(s) and will begin the consultation process, if requested and applicable, pending processing the Native American Tribal Consultation Form.

A1-11 The project's Initial Study did not identify significant impacts for historical resources and no mitigation measures of feasible alternatives for native cultural resources were identified in the DEIR.

A1-12 The project's Initial Study did not identify significant impacts for tribal cultural resources and no mitigation measures of feasible alternatives for native cultural resources were identified in the DEIR.

A1-13 The project's Initial Study did not identify significant impacts for tribal cultural resources and no mitigation measures of feasible alternatives for native cultural resources were identified in the DEIR.

A1-14 The DEIR did not identify a significant impact on tribal cultural resources and thus the certification requirements identified in the comment are not applicable.

A1-15 The comment is informational in nature regarding SB 18. In addition, the project does not involve the adoption or amendment of a general plan or a specific plan, or the designation of open space. The project is a proposed rule amendment to adopt stricter ROC limits of certain architectural coatings used and sold in Ventura County in an effort to improve regional air quality and consequently reducing ozone pollution which may help in preserving the cultural resources.

A1-16 The DEIR did not identify a significant impact on tribal cultural resources and thus a cultural resource assessment is not required. The project does not include a specific physical location or Area of Potential Effect (AP) and is administrative in nature (air quality rule amendment).

A1-17 The DEIR did not identify a significant impact on tribal cultural resources and thus a cultural resource assessment is not required. The project does not include a specific physical location or APE and is administrative in nature (air quality rule amendment). However, the District has still contacted the Native American Heritage Commission and submitted a Native American Tribal Consultation List Request Form.

A1-18 The project's Initial Study did not identify significant impacts for tribal cultural resources and no mitigation measures of feasible alternatives for native cultural resources were identified in the DEIR.

LETTER A2

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY Gavin Newsom, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-9140
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TTY 711
www.dot.ca.gov

Making Conservation a California Way of Life.

August 10, 2020

Danny McQuillan
Ventura County Air Pollution Control District
669 County Square Drive, 2nd Floor
Ventura, CA 93003

RE: Proposed Amendment to VCAPCD Rule 74.2, Architectural Coatings – Notice of Preparation (NOP)
SCH # 2020070158
GTS # 07-VEN-2020-00412
Vic. Ventura County

Dear Danny McQuillan:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for this projects Notice of Preparation (NOP). The rule amendments are proposed to implement the California Air Resource Board Suggested Control Measure (SCM) for Architectural Coatings and the 2016 Ventura County Air Quality Management Plan (AQMP). These amendments consist of lowering VOC After reviewing the NOP, Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities..

A2-1

If you have any questions, please contact Reece Allen, the project coordinator, at reece.allen@dot.ca.gov, and refer to GTS # 07-VEN-2020-00412

Sincerely,

MIYA EDMONSON
IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse

Letter A2	California Department of Transportation (Caltrans) Maya Edmonson, IGR/CEQA Branch Chief August 10, 2020

A2-1 Comment noted. No response required.

LETTER A3

Danny McQuillan

From: Bassiri, Ramesh <Ramesh.Bassiri@ventura.org>
Sent: Monday, August 3, 2020 1:24 PM
To: Danny McQuillan
Subject: ODR 20 - Rule 74.2

Hello Danny,

Following review of the proposed amendments to VCAPCD Rule 74.2, Architectural Coatings, the Environmental Health Division has no comments. A3-1

Please let me know if you have any questions.

Thank you,

Ramesh Bassiri, R.E.H.S.
Technical Services Section
Land Use / Liquid Waste / Water Systems
Ventura County Environmental Health Division
800 S. Victoria Avenue
Ventura, CA 93009-1730
(805) 654-2830 Office
(805) 654-2480 Fax
EHD Website: www.vcrma.org/divisions/environmental-health

Letter A3	Ventura County Environmental Health Division Ramesh Bassiri, Technical Services Section August 3, 2020

A3-1 Comment noted. No response is required.