



WORKSHOP NOTICE

April 23, 2009

TO: INTERESTED PARTIES
FROM: EXECUTIVE OFFICER / APCO
SUBJECT: **PUBLIC WORKSHOP - DRAFT AMENDMENTS TO REGULATION 8, RULE 32: WOOD PRODUCTS COATINGS**

The staff of the Bay Area Air Quality Management District (District) will conduct a public workshop to review and discuss possible amendments to Regulation 8, Rule 32: *Wood Products Coatings* from **2:00 – 4:00 PM on Monday, May 18, 2009 in San Francisco**. The workshop will be held in the 7th Floor Board of Directors meeting room at the District office located at 939 Ellis Street, San Francisco.

BACKGROUND:

The Bay Area Air Quality Management District is considering amendments to this regulation to reduce emissions of organic compounds from wood coatings at wood product manufacturing facilities through more restrictive limits on volatile organic compounds. The Bay Area is not yet in attainment of state ozone standards, so the region must implement all feasible measures to reduce the pollutants that form ozone: nitrogen oxides (NO_x) and volatile organic compounds. Control Measure SS-5 of the District's 2005 Ozone Strategy proposed consideration of amendments to Regulation 8, Rule 32 to reduce volatile organic emissions.

Regulation 8-32 regulates volatile organic compound (VOC) emissions from the wood products manufacturing industry by setting standards for application techniques and the amount of VOC in coatings that can be used in surface preparation, coatings application, and cleanup for the manufacture of wood products including furniture, bathroom vanities, kitchen cabinets, picture frames, outdoor speakers, architectural millwork, and other wood products.

Regulation 8, Rule 32: Wood Products Coatings was adopted in 1983, and has evolved considerably since then. The original focus of the rule was on more transfer efficient application equipment. VOC content limits were established in 1991, and adjusted in 1994 and 1996 to match the technologies of solvent and water based coatings available.

WORKSHOP DISCUSSION:

The proposed rule amendments will reduce the amount of VOC allowed in various types of wood products coatings. District staff is proposing more stringent VOC standards because the performance of low-VOC solvent-based coatings (using exempt solvents) and water-borne wood coating products has improved considerably over the last 10 years, and low-VOC products are now readily available that meet wood products manufacturers' needs. District staff is proposing to reduce VOC limits for sealers, fillers, wash-coats and stains. The proposed limits are consistent with standards adopted by several other California air districts in the past few years. Staff believes that such limits are similarly appropriate for the Bay Area.

Staff is also considering alternative standards based on a coating's VOC content relative to the amount of coating solids the coating contains. Coating solids are the binders, pigments, and resins that form the coating on the wood product after the VOCs have evaporated and the coating has dried. If a coating has greater solids content, less coating may be required to coat a wood product, so fewer VOCs are emitted. In order to encourage manufacturers to use coatings with higher solids content, the proposed amendments provide an alternative compliance option: one based on the VOC content per unit of coating solids. Wood products manufacturers are then able to choose whichever compliance option best suits their needs.

The proposed amendments also include several related provisions to improve the implementation and enforceability of the rule. These amendments include revisions to the way coatings are classified for purposes of VOC content regulation, enhanced labeling requirements for wood products coatings, and editorial revisions to the rule language to make it easier for wood coatings users and the public to understand what is required. In addition, the Emissions Averaging Procedure found in the Manual of Procedures, Volume 1 is proposed to be updated to be consistent with the proposed rule amendments.

Staff welcomes your participation in the workshop and input on the proposed rule amendments. For copies of the draft amendments to Regulation 8-32 that the District is considering, and a copy of the workshop report, see the District's website at <http://www.baaqmd.gov/pln/ruledev/workshops.htm>. For questions or comments on the potential amendments, please contact Guy A. Gimlen, Senior Air Quality Engineer, at (415) 749-4734 or via e-mail at ggimlen@baaqmd.gov. **Written comments, submitted by U.S. mail or electronic mail, are requested by the end of Friday, May 29, 2009.**

PUBLIC TRANSPORTATION

**MUNI -- #47 AND 49 NORTH AND SOUTH ON VAN NESS AVENUE
#38 EAST AND WEST ON GEARY BOULEVARD/O'FARRELL STREET
BART -- CIVIC CENTER STATION 8TH AND MARKET STREETS**

Attendees are encouraged to ride public transit, rideshare, bicycle, walk or use other non-motorized modes to and from the District.