Amendments to Rule 442
Architectural Coatings

Ananya Srinivas, Air Quality Engineer
Board Meeting, July 25, 2024

SACRAMENTO METROPOLITAN
AIR QUALITY
MANAGEMENT DISTRICT

Why Amend Rule 442?

SACRAMENTO METROPOLITAN

AIR QUALITY
MANAGEMENT DISTRICT

- Region is Severe nonattainment for both the 2008 and 2015 Ozone National Ambient Air Quality Standard

- State Implementation Plans (SIP) require Contingency Measures in case attainment goals are not met (Clean Air Act)
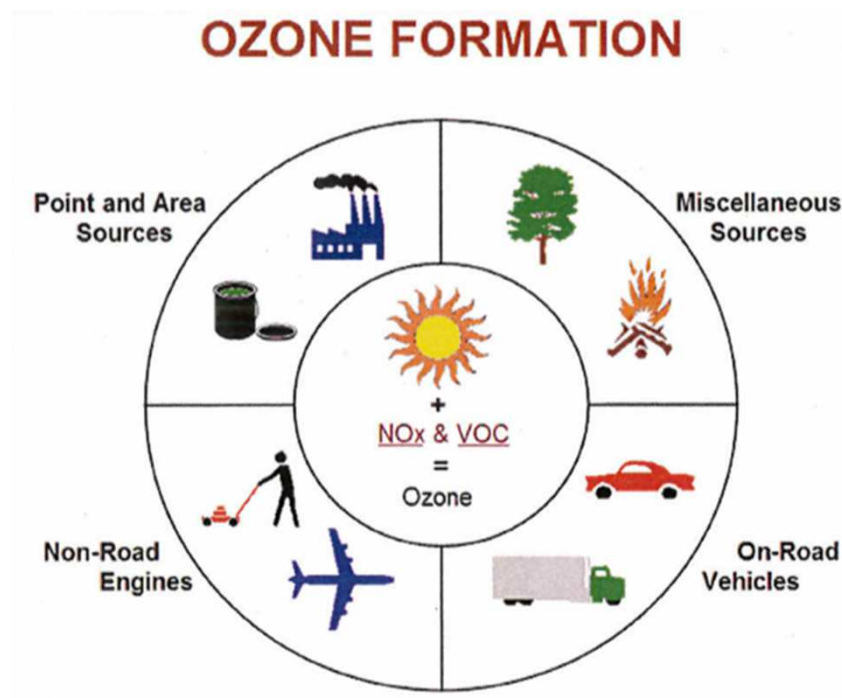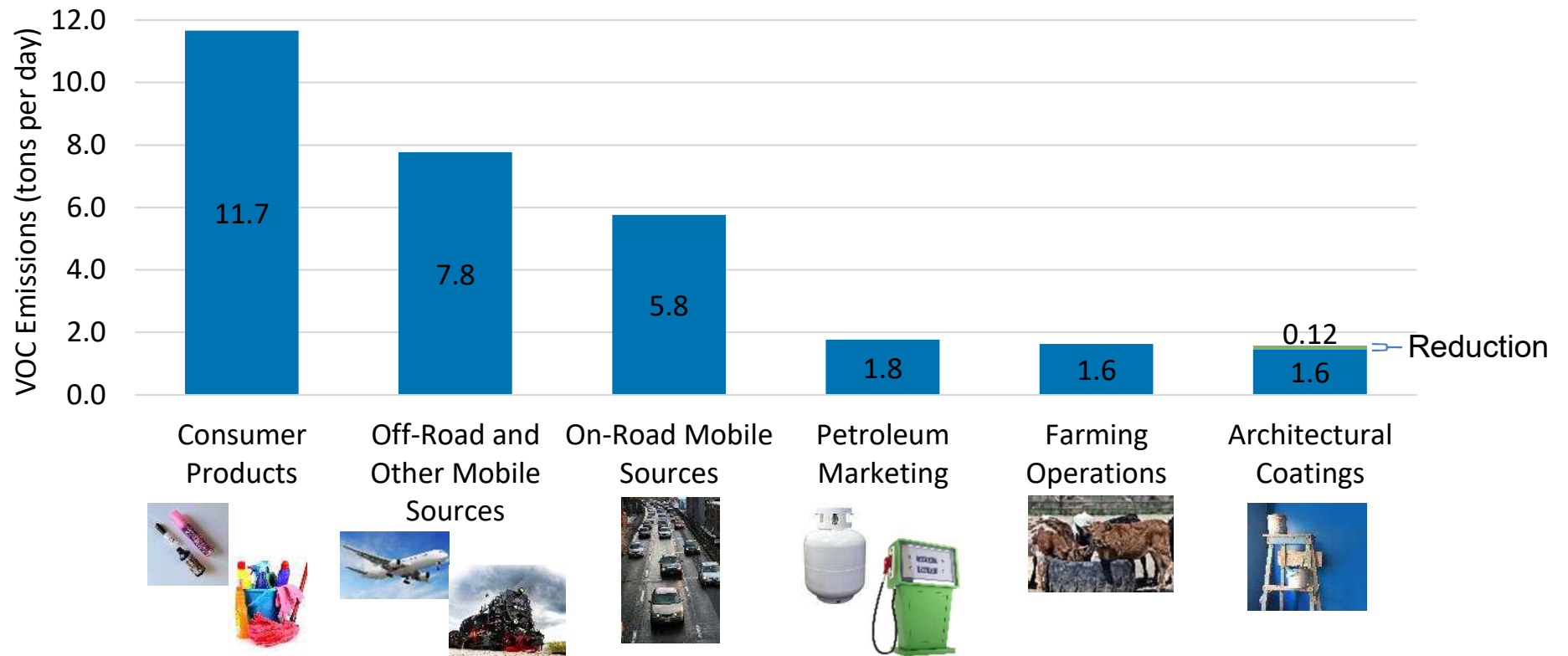
Regional Air District

El Dorado County AQMD

Feather River AQMD

Placer County APCD

Sacramento Metropolitan AQMD

Yolo-Solano AQMD
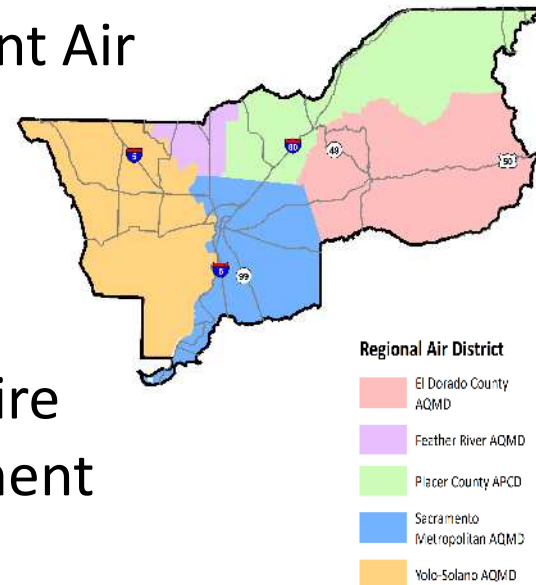
Ozone Formation

NOx + VOC + sunlight = ozone

NOx – nitrogen oxides

VOC – volatile organic compounds

OZONE FORMATION

Point and Area Sources

Miscellaneous Sources

+ NOx & VOC = Ozone

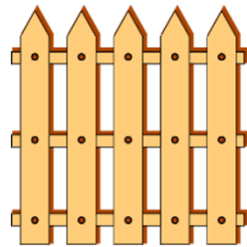Non-Road Engines

On-Road Vehicles

VOC Emissions Inventory and Reductions

What are architectural coatings?

- Paints, primers, stains applied to stationary structures
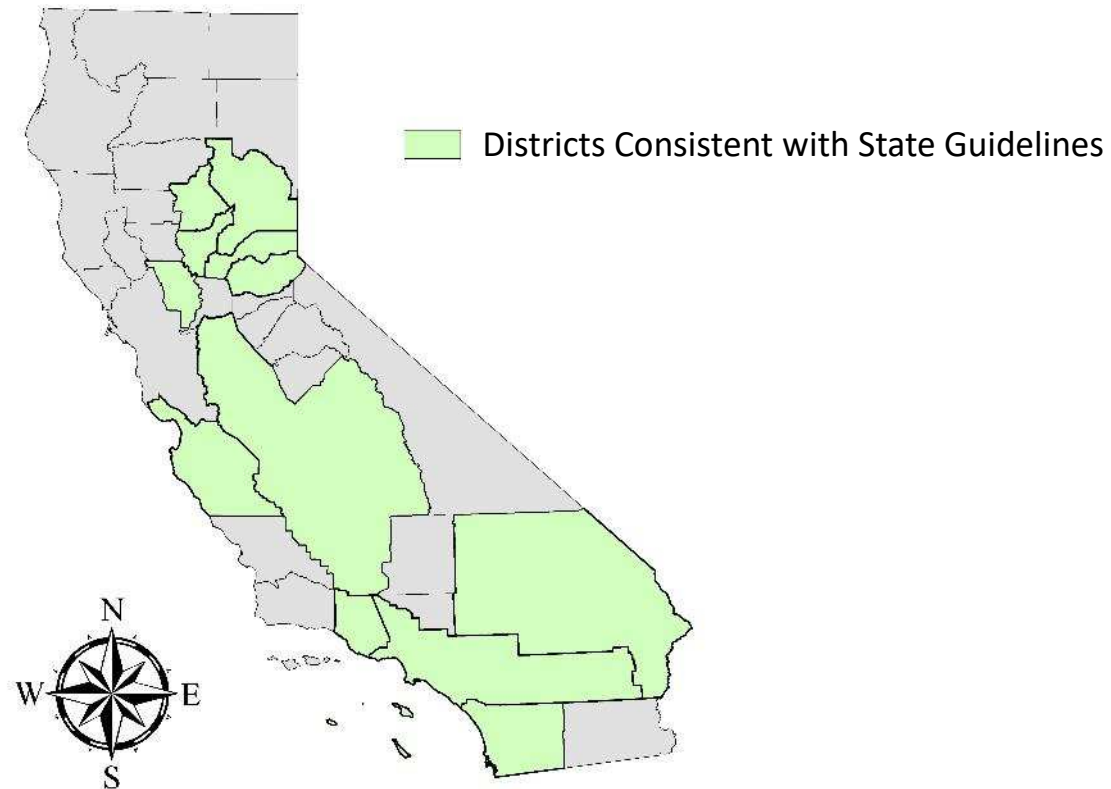- NOT for mobile equipment

How is Rule 442 being changed?

- Consistent with most recent state guidelines

- Lower VOC limits

- New categories

- Provide a one-year sell through

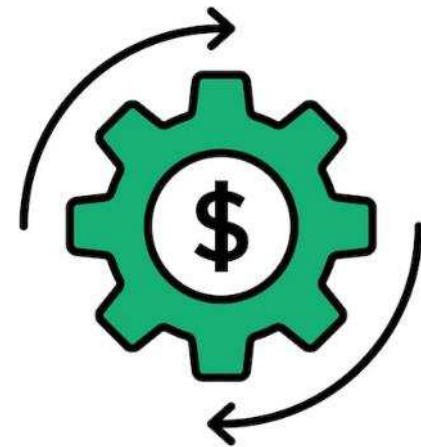# Where Have These Guidelines Been Adopted?

Districts Consistent with State Guidelines

Who does Rule 442 affect?

- Manufacturers, marketers, distributers

- Consumers — coating users

Cost Effectiveness

- Emission reductions of 7.8%

- Compliant products available

- CARB: retail cost increase ≤ 11%

- Cost effectiveness of $2.21 per pound of VOC reduced

Outreach

- Public Workshop: April 18, 2024
- Today's Hearing

- Both noticed through the *Sacramento Bee*, District website, and by email

U.S. EPA Region 9 Comments

- **Comment:** Suggest restricting small container exemptions
- **Response:** Minimal benefit, staff does not recommend these restrictions

- **Comment:** Concern about the ability to verify rule compliance if records are only provided upon request
- **Response:** No change is proposed, will wait for additional guidance from EPA

American Coatings Association (ACA) Comments

- **Comment**: Suggested an extension of the sell-through period to three years

- **Response:** Due to needing to achieve reductions a year after triggering the measure staff does not recommend extending sell-through period

Recommendations

- Conduct a public hearing

- Determine the amendments to Rule 442 are exempt from the CEQA

- Approve the resolution adopting amended Rule 442

- Direct staff to forward amended rule to CARB for submittal to US EPA