



This Advisory is provided to inform you about activities of the Air District which may affect your operation. It is hoped that it will assist you in your effort to achieve and maintain compliance with applicable air pollution rules and regulations.

ATTENTION: WOOD PRODUCTS OPERATORS AND MANUFACTURERS

**SUBJECT: NEW AND REVISED REQUIREMENTS FOR WOOD PRODUCTS COATINGS
(REGULATION 8, RULE 32)**

On August 5, 2009 the Bay Area Air Quality Management District (Air District) amended Regulation 8, Rule 32 (Reg. 8-32). Regulation 8-32 applies to the in-shop coating of wood products including kitchen cabinetry, furniture, wooden picture frames, speaker cabinets and architectural millwork and other wood products. The amendments further reduce Volatile Organic Compound (VOC) emissions from wood products coatings by incorporating lower VOC limits and also clarifying operational standards. The following changes become **effective July 1, 2010:**

New VOC Limits: Amendments in the rule reduce VOC limits for most coatings (used by operators) as shown in the table below.

Coating Category	VOC Limit (grams/liter)
High Solids Coatings	
• Clear Sealer	275 g/l
• Clear Topcoat	275 g/l
• Sanding Sealer	275 g/l
• Pigmented Primers, Sealer, and Undercoat	275 g/l
• Pigmented Topcoat	275 g/l
• Multi-colored Coating	275 g/l
• Filler	275 g/l
High Solids Stain	350 g/l
Low Solids Coatings	
• Low Solids Stain	120 g/l
• Low Solids Toner and Wash-coat	120 g/l
Surface Preparation and Clean-up Solvents	25 g/l
Single Application Conversion Varnish ¹	550 g/l
Custom Furniture Clear Topcoat ²	550 g/l

¹ VOC limit applies for use on wood furniture, custom cabinetry and custom architectural millwork only.

² Custom furniture is wood furniture individually designed and produced to order for a specific space and client as ordered by that client or a professional architect or designer.

Some coating manufacturers may produce coatings that comply with the new VOC limits on a grams/g solids basis. Please see Reg. 8-32-302 and 303 for details.

Other amendments revise definitions and clarify compliance determination procedures.

Some exemptions from the VOC limits apply, such as for antique refinishing and for specific finishes. Please see Reg. 8-32, for details. In addition, Reg. 8-32 provides for an averaging procedure. Please see Reg. 8-32, Section 307 for details.

Additional changes for manufacturers:

- VOC content must be stated on labels of coatings and solvents manufactured on or after **July 1, 2010**.
- Compliance information must be included on product data sheets on or after **July 1, 2010**.
- Thinning recommendations and VOC content of coating after thinning must be stated on the product data sheets on or after **July 1, 2010**.
- Effective **July 1, 2012**, each wood products coating manufacturer will be required to estimate formaldehyde emissions generated by drying or curing of their coatings in the Bay Area. Staff are currently working with manufacturers and resin suppliers and will supply more information on this requirement in the future.

If you have any further needs, please call the District at the following numbers:

- ☎ For further questions on this Advisory or Air District Regulation, call Janet Simon, Air Quality Specialist at jsimon@baaqmd.gov, (415) 749-4780.
- ☎ For a copy of the rule, see www.baaqmd.gov/Divisions/Planning_and_Research/Rules_and_Regulations.aspx.

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