# APPENDIX E Contingency Measures

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# **E. CONTINGENCY MEASURES**

# E.1. CARB's Assessment of Potential Contingency Measures

California Air Resources Board (CARB) has evaluated potential options for a contingency measure within each of CARB's regulations using criteria to determine its feasibility given the contingency measure requirements under the Clean Air Act, recent court decisions, and United States Environmental Protection Agency draft guidance (EPA, 2023). The evaluation results are summarized in Table E-1.

Emission Source	Regulatory Programs	Latest Amendment Requirements	Contingency Options	Trigger Feasibility	Technological Feasibility
Light-Duty Passenger Vehicles and Light- Duty Trucks	Advanced Clean Cars Program (I and II), including the Zero Emission Vehicle (ZEV) Regulation	Amended 8/25/22 Requires 100% ZEV new vehicle sales by 2035 and increasingly stringent standards for gasoline cars and passenger trucks.	Pulling compliance timelines forward. Setting more stringent standards.	No; standards need years of lead time to be developed, certified, and implemented; infeasible to implement new standard or manufacturing requirements within 60 days and achieve reductions within one year.	No; current standards and requirements are technology forcing and most stringent in the nation, including a zero-emission requirement. Further stringency would not be feasible.
	Clean Miles Standard	Adopted 5/20/21 Set eVMT (electric miles traveled) and greenhouse gas (GHG) requirements for Transportation Network Companies (TNCs).	Pulling forward timeline to achieve 100% eVMT.	No; standards and fleet requirements need lead time to be implemented; infeasible to implement new standard or purchasing requirements within 60 days and achieve reductions within one year.	No; zero-emissions technology requirement is most stringent standard; TNCs are only a small portion of on-road vehicles, depending on area, may not achieve many reductions.
	On Board Diagnostics II (OBD)	Amended July 22, 2021 Required updates to program to address cold start emissions and diesel particulate matter (PM) monitoring. Many of the regulatory changes included phase-ins that are	Removing or pulling phase- in timelines forward. Setting more stringent OBD requirements.	No; OBD requirements need significant lead time to be developed, adopted, and implemented; infeasible to fully implement new requirements within 60 days and achieve similar reductions within one year.	No; the OBD requirements require sufficient lead time to implement with significant development time needed for hardware/ software changes and verification/validation testing.

 Table E-1 Assessment of Potential CARB Contingency Measures

		not 100% until 2027.			
	California Smog Check Program	Amended 2010 via legislation Smog Check Program enhancements, including new technologies and test methods.	Change the exemptions from 8 to 7 and/or 6 model years. Require annual Smog Check. Require annual Smog Check for only high mileage vehicles.	Yes (changing the exemptions) because it is not a regulatory change; No (other options); Smog Check requirements need significant lead time to be developed, adopted, and implemented; infeasible to fully implement new requirements within 60 days and achieve similar reductions within one year.	Yes (changing the exemptions) and would not have disproportionate impacts; Yes (other options), but would disproportionately impact low-income populations and disadvantaged communities.
	Reformulate d Gasoline	Amended May 2003 Required removal of methyl tert-butyl ether (MTBE) and included refinery limits and cap limits.	Require more stringent standards. Change cap limits and refinery limits.	No; fuel standards need years of lead time to be developed, certified, and implemented; infeasible to implement new standard within 60 days and achieve reductions within one year.	No; current standards and requirements are some of most stringent in the world; not feasible to require further stringency of specifications and develop or manufacture in a compressed timeline.
Motorcycle s	On-Road Motorcycle Regulation*	Proposed hearing: 2023 May require exhaust emissions standards (harmonize with European standards), evaporative emissions standards, and Zero Emission Motorcycle sales thresholds.	Pulling compliance timelines forward. Require more stringent emissions standards.	No; standards need years of lead time to be developed, certified, and implemented; infeasible to implement new standard within 60 days and achieve reductions within one year.	No; Any increase to the stringency of proposed standards would require an additional 1 to 2 years of lead time for 1) CARB staff to evaluate feasibility, and 2) manufacturers to develop and certify compliant motorcycles.

Medium Duty- Trucks	Clean Diesel Fuel	Amended 2013 Established more stringent standards for diesel fuel.	Require more stringent fuel standard.	No; fuel standards need years of lead time to be developed, certified, and implemented; infeasible to implement new standard within 60 days and achieve reductions within one year.	No; infeasible to require more stringent standards in compressed timeline.
	Heavy-Duty Engine and Vehicle Omnibus Regulation	Adopted 8/27/20 Established new low NO <sub>X</sub> and lower PM tailpipe standards and lengthened the useful life and emissions warranty of in-use heavy- duty diesel engines.	Require more stringent standard, make optional idling standard required. Update testing requirements or corrective action procedures.	No; standards need years of lead time to be implemented; infeasible to implement new sales requirement within 60 days and achieve reductions within one year.	No; infeasible to require more stringent standards in compressed timeline.
	Advanced Clean Trucks Regulation	Adopted 6/25/20 Established manufacturer zero- emission truck sales requirement and company and fleet reporting.	Move up timeline for ZEV sales requirement. Reduce threshold for compliance.	No; manufacturer sales requirements need years of lead time to be implemented; infeasible to implement new sales requirement within 60 days. Sales requirement would not happen immediately or within one year of trigger; infeasible to achieve reductions within one year.	No; current sales requirement is technology forcing and most stringent in the nation.
	Advanced Clean Cars Program (I and II), including the Zero Emission Vehicle Regulation	Amended 8/25/22 Requires 100% ZEV new vehicle sales by 2035 and increasingly stringent standards for gasoline cars and passenger trucks.	Pulling compliance timelines forward. Setting more stringent standards.	No; standards need years of lead time to be developed, certified, and implemented; infeasible to implement new standard or manufacturing requirements within 60 days and achieve reductions within one year.	No; current standards and requirements are technology forcing and most stringent in the nation, including a zero-emission requirement. Further stringency would not be feasible.

	Advanced Clean Fleets Regulation	Adopted 4/27/23 Establishes zero- emission purchasing requirements for medium- and heavy-duty vehicle fleets (including state and local agencies, and drayage fleets, high priority, and federal fleets); would also require 100% zero- emission new vehicle sales starting 2040.	Pulling compliance timelines forward. Reduce threshold for compliance.	No; fleet requirements need years of lead time to be implemented; infeasible to implement new purchasing requirements within 60 days. Purchasing requirement and turnover would not happen immediately; infeasible to achieve reductions within one year. Because of near term compliance deadlines, moving forward deadlines would not result in many reductions.	No; current fleet requirements are technology forcing and most stringent in the nation, eventually requiring zero- emissions only.
Heavy-Duty Trucks	Heavy-Duty Low NO <sub>X</sub> Engine Standards	See Omnibus.	More stringent standards were set with Omnibus Regulation.	No; engine standards need years of lead time to be developed, certified, and implemented; infeasible to implement new standard or purchasing requirements within 60 days and achieve reductions within one year.	No; infeasible to require more stringent technology forcing standards in compressed timeline if technology/ alternatives are not widely available.
	Optional Low-NO <sub>X</sub> Standards for Heavy- Duty Diesel Engines	Amended 8/27/20 as a part of Omnibus to lower the optional low NO <sub>x</sub> emission standards for on- road heavy-duty engines.	Make option required.	No; engine standards need years of lead time to be developed, certified, and implemented; infeasible to implement new standard or purchasing requirements within 60 days and achieve reductions within one year.	No; infeasible to require more stringent technology forcing standards in compressed timeline if technology/ alternatives are not widely available.
	Heavy-Duty Inspection and Maintenanc e Regulation	Adopted 12/9/21 Requires periodic vehicle emissions testing and reporting on nearly all heavy-duty vehicles operating in California.	Increase frequency of testing.	No; increased I/M requirements need significant lead time to be developed, adopted, and implemented; infeasible to fully implement new	Yes, but costs would disproportionally impact small businesses and low- income populations.

			requirements within 60 days and achieve similar reductions within one year.	
Heavy-Duty OBD	Amended July 22, 2021 Required updates to program to address cold start emissions and diesel PM monitoring. Many of the regulatory changes included phase-ins that are not 100% until 2027.	Removing or pulling phase- in timelines forward. Setting more stringent OBD requirements.	No; OBD requirements need significant lead time to be developed, adopted, and implemented; infeasible to fully implement new requirements within 60 days and achieve similar reductions within one year.	No; the OBD requirements require sufficient lead time to implement with significant development time needed for hardware/ software changes and verification/validation testing.
Heavy-Duty Engine and Vehicle Omnibus Regulation	Adopted 8/27/20 Established new low NO <sub>x</sub> and lower PM Standards and lengthened the useful life and emissions warranty of in-use heavy- duty diesel engines.	Require more stringent standard, make optional idling standard required. Update testing requirements or corrective action procedures.	No; standards need years of lead time to be developed, certified, and implemented; infeasible to implement new standard or sales requirements within 60 days and achieve reductions within one year.	No; infeasible to require more stringent technology forcing standards in compressed timeline.
Cleaner In- Use Heavy- Duty Trucks (Truck and Bus Regulation)	Adopted 12/17/10 Requires heavy- duty diesel vehicles that operate in California to reduce exhaust emissions. By January 1, 2023, nearly all trucks and buses will be required to have 2010 or newer model year engines to reduce PM and NO <sub>X</sub> .	None	-	-

	Zero- Emission Powertrain Certification Regulation	Adopted 12/6/19 Establishes certification requirements for zero-emission powertrains.	None	-	-
	Advanced Clean Trucks Regulation	Adopted 6/25/20 Established manufacturer zero- emission truck sales requirement and company and fleet reporting.	Move up timeline for ZEV sales requirement. Reduce threshold for compliance.	No; manufacturer sales requirements need years of lead time to be implemented; infeasible to implement new sales requirement within 60 days. Sales requirement would not happen immediately or within one year of trigger; infeasible to achieve reductions within one year.	No; current sales requirement is technology forcing and most stringent in the nation.
	Advanced Clean Fleets Regulation	Adopted 4/27/23 Establishes zero- emission purchasing requirements for medium- and heavy-duty vehicle fleets (including state and local agencies, and drayage fleets, high priority, and federal fleets); would also require 100% zero- emission new vehicle sales starting 2040.	Pulling compliance timelines forward. Reduce threshold for compliance.	No; fleet requirements need years of lead time to be implemented; infeasible to implement new purchasing requirements within 60 days. Purchasing requirement and turnover would not happen immediately; infeasible to achieve reductions within one year. Because of near term compliance deadlines, moving forward deadlines would not result in many reductions.	No; current fleet requirements are technology forcing and most stringent in the nation, eventually requiring zero- emissions only.
Heavy-Duty Urban Buses	Innovative Clean Transit	Adopted 12/14/2018 Requires all public transit agencies to gradually transition to a 100% zero- emission bus fleet.	Move compliance timelines forward. Remove various exemptions or compliance options.	No; fleet requirements need years of lead time to be implemented; infeasible to implement new purchasing requirements within 60 days. Purchasing requirement and turnover would not happen immediately; infeasible to achieve	No; current requirements are technology forcing and most stringent (zero- emission requirement). Further stringency is not possible; expediting timelines would not be feasible.

				reductions within one year.	
	Advanced Clean Fleets Regulation	Adopted 4/27/23 Establishes zero- emission purchasing requirements for medium- and heavy-duty vehicle fleets (including state and local agencies, and drayage fleets, high priority, and federal fleets); would also require 100% zero- emission new vehicle sales starting 2040.	Pulling compliance timelines forward. Reduce threshold for compliance.	No; fleet requirements need years of lead time to be implemented; infeasible to implement new purchasing requirements within 60 days. Purchasing requirement and turnover would not happen immediately; infeasible to achieve reductions within one year. Because of near term compliance deadlines, moving forward deadlines would not result in many reductions.	No; current fleet requirements are technology forcing and most stringent in the nation, eventually requiring zero- emissions only.
Other Buses, Other Buses – Motor Coach	Zero- Emission Airport Shuttle Regulation	Adopted 6/27/19 Requires airport shuttles to transition to zero- emission fleet.	Pull compliance timelines forward. Remove reserve airport shuttle exemption.	No; fleet requirements need years of lead time to be implemented; infeasible to implement new purchasing requirements within 60 days. Purchasing requirement and turnover would not happen immediately; infeasible to achieve reductions within one year.	No; current requirements are technology forcing and most stringent (zero- emission requirement). Further stringency is not possible. Not many shuttles in area, would not achieve many reductions.
	Advanced Clean Fleets Regulation	Adopted 4/27/23 Establishes zero- emission purchasing requirements for medium- and heavy-duty vehicle fleets (including state and local agencies, and drayage fleets,	Pulling compliance timelines forward. Reduce threshold for compliance.	No; fleet requirements need years of lead time to be implemented; infeasible to implement new purchasing requirements within 60 days. Purchasing requirement and turnover would not happen immediately;	No; current fleet requirements are technology forcing and most stringent in the nation, eventually requiring zero- emissions only.

		high priority, and federal fleets); would also require 100% zero- emission new vehicle sales starting 2040.		infeasible to achieve reductions within one year. Because of near term compliance deadlines, moving forward deadlines would not result in many reductions.	
Commercia I Harbor Craft	Commercial Harbor Craft (CHC) Regulation	Amended 3/24/22 Established more stringent standards, all CHC required to use renewable diesel, expanded requirements, and mandates zero- emission and advanced technologies.	Set more stringent standards. Pull compliance timelines forward.	No; Technology requirements and standards need years of lead time to be developed, certified, and implemented; infeasible to implement new standard or requirements within 60 days and achieve reductions within one year.	No; standards set are technology forcing and most stringent; not technologically feasible to require increased stringency in compressed timeline.
Recreation al Boats	Spark- Ignition Marine Engine Standards*	Proposed hearing: 2029 Would establish catalyst-based emission standards and percentage of zero-emission technologies for certain applications.	Set more stringent standard.	No; standards need years of lead time to be developed, certified, and implemented; infeasible to implement new standard within 60 days and achieve reductions within one year.	No; standards being set will be most stringent feasible, including zero- emission requirement); would not save a more stringent standard for contingency
Transport Refrigeratio n Units	Airborne Toxic Control Measure for In-Use Diesel- Fueled Transport Refrigeratio n Units (TRUs) (Parts I and II*)	Amended 2/24/22 (Part I), Part II proposed CARB hearing in 2025 Requires diesel- powered truck TRUs to transition to zero-emission, PM emission standard for newly manufactured non- truck TRUs. Part II would establish zero-emission options for non- truck TRUs.	Set more stringent standards. Pull compliance timelines forward	No; standards and fleet requirements need years of lead time to be implemented; infeasible to implement new standard or purchasing requirements within 60 days and achieve reductions within one year.	No; current requirements are technology forcing and most stringent (zero- emission requirement). Further stringency is not possible; expediting timelines would not be feasible; would not save a more stringent standard for contingency

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Industrial Equipment	Large Spark- Ignition (LSI) Engine Fleet Requiremen ts Regulation	Amended July 2016 Extended recordkeeping requirements, established labeling, initial reporting, and annual reporting requirements.	Set more stringent performance standards	No; standards and fleet requirements need years of lead time to be implemented; infeasible to implement new standard or purchasing requirements within 60 days and achieve reductions within one year.	No; Infeasible to require further stringency within one year given timeline for technology development and certification. See Zero- Emission Forklifts below.
	Off-Road Regulation	Amended 11/17/22 Requires phase out of oldest and highest-emitting engines, restricts addition of Tier 3 and 4i engines, mandates renewable diesel for all fleets.	Pull phase- out or compliance timelines forward	No; fleet requirements need years of lead time to be implemented; infeasible to implement new purchasing and turnover requirements within 60 days and achieve reductions within one year.	No; Infeasible to require further stringency within one year given timeline for technology development and certification.
	Zero- Emission Forklifts*	Proposed CARB hearing in 2023. Would require model-year phase- out and reporting requirements and manufacturer sales restrictions.	Pull phase- out or compliance timelines forward	No; standards requirements need years of lead time to be developed, certified, and implemented; infeasible to implement new standard within 60 days and achieve reductions within one year.	No; standards being set will be technology forcing and most stringent feasible, including zero- emission requirement; would not save a more stringent standard for contingency
	Off-Road Zero- Emission Targeted Manufactur er Rule*	Proposed CARB hearing in 2027. Would require manufacturers of off-road equipment and/or engines to produce for sale zero-emission equipment and/or powertrains as a percentage of their annual statewide sales volume.	Pull forward compliance timelines or increase percentage sales requirements	No; Manufacturing and sales requirements need years of lead time to be implemented; infeasible to pull forward standards within 60 days and achieve reductions within one year.	No; standards being set will be technology forcing and most stringent feasible, including zero- emission requirement; would not save a more stringent standard for contingency

Constructio n and Mining	Off-Road Zero- Emission Targeted Manufactur er Rule*	Proposed CARB hearing in 2027. Would require manufacturers of off-road equipment and/or engines to produce for sale zero-emission equipment and/or powertrains as a percentage of their annual statewide sales volume.	Pull forward compliance timelines or increase percentage sales requirements	No; Manufacturing and sales requirements need years of lead time to be implemented; infeasible to pull forward standards within 60 days and achieve reductions within one year.	No; standards being set will be technology forcing and most stringent feasible, including zero- emission requirement; would not save a more stringent standard for contingency
	Off-Road Regulation	Amended 11/17/22 Requires phase out of oldest and highest-emitting engines, restricts addition of Tier 3 and 4i engines, mandates renewable diesel for all fleets.	Pull phase- out or compliance timelines forward	No; fleet requirements need years of lead time to be implemented; infeasible to implement new purchasing and turnover requirements within 60 days and achieve reductions within one year.	No; Infeasible to require further stringency within one year given timeline for technology development and certification.
Airport Ground Support Equipment	Zero- Emission Forklifts*	Proposed CARB hearing in 2023. Would require model-year phase- out and reporting requirements and manufacturer sales restrictions.	Pull phase- out or compliance timelines forward	No; standards requirements need years of lead time to be developed, certified, and implemented; infeasible to implement new standard within 60 days and achieve reductions within one year.	No; standards being set will be technology forcing and most stringent feasible, including zero- emission requirement; would not save a more stringent standard for contingency
	Large Spark- Ignition (LSI) Engine Fleet Requiremen ts Regulation	Amended July 2016 Extended recordkeeping requirements, established labeling, initial reporting, and annual reporting requirements.	Set more stringent performance standards	No; standards and fleet requirements need years of lead time to be implemented; infeasible to implement new standard or purchasing requirements within 60 days and achieve reductions within one year.	No; Infeasible to require further stringency within one year given timeline for technology development and certification.

	Off-Road Regulation	Amended 11/17/22. Requires phase out of oldest and highest-emitting engines, restricts addition of Tier 3 and 4i engines, mandates renewable diesel for all fleets.	Pull phase- out or compliance timelines forward	No; fleet requirements need years of lead time to be implemented; infeasible to implement new purchasing and turnover requirements within 60 days and achieve reductions within one year.	No; Infeasible to require further stringency within one year given timeline for technology development and certification.
Port Operations and Rail Operations	Cargo Handling Equipment Regulation*	Proposed CARB hearing in 2025. Amendments to transition to zero- emission technology.	None	No; Standards requirements need years of lead time to be developed, certified, and implemented; infeasible to implement new standard within 60 days and achieve reductions within one year. Fully implemented in 2017 and relies on other engine standards, making it infeasible to trigger without regulatory process changing other standards.	No; Considering regulation to move towards zero- emissions. Currently assessing availability of technologies.
	Off-Road Zero- Emission Targeted Manufactur er Rule*	Proposed CARB hearing in 2027. Would require manufacturers of off-road equipment and/or engines to produce for sale zero-emission equipment and/or powertrains as a percentage of their annual statewide sales volume.	Pull forward compliance timelines or increase percentage sales requirements	No; Manufacturing and sales requirements need years of lead time to be implemented; infeasible to pull forward standards within 60 days and achieve reductions within one year.	No; standards being set will be technology forcing and most stringent feasible, including zero- emission requirement; would not save a more stringent standard for contingency
Lawn and Garden	Small Off- Road Engine (SORE) Regulation	Amended 12/9/21 Requires most newly manufactured SORE to meet emission standards of zero	Move up implementatio n deadlines	No; Standards requirements need years of lead time to be implemented; infeasible to pull forward standards within 60 days. Purchasing would not	No; current standards and requirements are a technology forcing zero-emission certification requirement. Further stringency would not be possible.

		starting in model year (MY) 2024.		happen immediately or within one year of trigger; infeasible to achieve reductions within one year.	
Ocean- Going Vessels	At Berth Regulation	Amended 8/27/20 Expands requirements to roll-on roll-off vessels and tankers, smaller fleets, and new ports and terminals.	Remove option to use alternate control technology or set more stringent alternate control technology requirements. Reduce threshold for 'low activity terminals' exemption.	No; control technology requirements need years of lead time to be implemented; infeasible to pull forward standards within 60 days and achieve reductions within one year.	No; regulation already requires use of shorepower or alternate control technology for every visit.
	Ocean- going Vessel Fuel Regulation	Amended 2011 Extended clean fuel zone and included exemption window.	Set more stringent requirements	No; fleet requirements need years of lead time to be implemented; infeasible to implement new purchasing and turnover requirements within 60 days and achieve reductions within one year.	No; not feasible to require further stringency in a compressed timeline.
Locomotive s	In-Use Locomotive Regulation	Adopted 4/27/23, Requires each operator to deposit funds into spending account for purchasing cleaner locomotive technology, sets idling limits, and requires registration and reporting. Starting in 2030, only locomotives less than 23 years old can operate in the state. Newly built passenger, switch,	Move up implementatio n deadlines. Set stricter idling requirements.	No; Fleet requirements need years of lead time to be implemented; infeasible to pull forward standards within 60 days and reductions within one year. No, for idling requirements.	No; current standards and requirements are technology forcing, include a zero- emission requirement. Further stringency would not be possible. No, for idling requirements, CARB is committing to re- evaluate the requirement during next assessment.

		and industrial locomotives must operate in a zero- emission configuration, and in 2035 newly built freight line haul locomotives.			
Areawide Sources	Zero- Emission Standard for Space and Water Heaters	Proposed CARB hearing in 2025. Beginning in 2030, 100% of sales of new space heaters and water heaters would need to meet a zero- emission standard.	Set trigger for more stringent standards or timelines.	No; Standards requirements need years of lead time to be implemented; infeasible to pull forward standards within 60 days. Purchasing would not happen immediately or within one year of trigger; infeasible to achieve reductions within one year.	No; current standards and requirements are a technology forcing zero-emission certification requirement. Further stringency would not be possible.

# E.2. SFNA Contingency Measures Commitment

Contingency Measure Number – SFNA 001 Contingency Measure Title: Architectural Coatings

#### E.2.1. Contingency Measure Description

The architectural coatings rules regulate the volatile organic compound (VOC) content of coatings applied to stationary structures and their appurtenances. Coating types include general use flat and non-flat coatings as well as specialty coatings such as industrial maintenance coatings, lacquers, floor coatings, roof coatings, stains, and many others. VOCs in the coatings are emitted as the coatings dry.

The air districts of the Sacramento Federal Nonattainment Area (SFNA) commit to amend their existing architectural coatings rules to add contingency provisions. The contingency provisions will incorporate the CARB 2019 Suggested Control Measure for Architectural Coatings (SCM). If triggered, these amendments would become effective within 60 days of a United States Environmental Protection Agency (EPA) finding that the SFNA has failed to attain the 2015 8-hour ozone National Ambient Air Quality Standard (NAAQS) by 2032, failed to meet reasonable further progress requirements, or failed to meet any applicable milestone. Once amended, these rules will help fulfill the State Implementation Plan (SIP) contingency measure requirements.

In the SFNA, each air district has an Architectural Coatings rule that regulates the VOC content of architectural coatings that are manufactured, sold, and used in their respective counties. The rule for each district is shown in Table E-2.

District	Rule	Title	Last Amended	2007 SCM?
EDAQMD	215	Architectural Coatings	8/25/2020	Yes
FRAQMD	3.15	Architectural Coatings	8/4/2014	Yes
PCAPCD	218	Architectural Coatings	10/14/2010	Yes
SMAQMD	442	Architectural Coatings	9/24/15	Yes
YSAQMD	2.14	Architectural Coatings	10/12/2016	Yes

 Table E-2: SFNA Architectural Coatings Rules

Each of these architectural coating rules were previously amended to be consistent with CARB's 2007 SCM for Architectural Coatings. CARB amended the SCM in 2019 to further reduce VOC content limits for specific categories and add VOC limits for colorants.

## E.2.2. CARB's 2019 Architectural Coatings Suggested Control Measure

The proposed contingency measure commitments are based on CARB's SCM for Architectural Coatings. The SCM is a model rule that CARB encourages local districts to adopt as a formal regulation. The purpose of the SCM is to promote uniformity among district rules, improve enforceability, and achieve additional reductions of VOC emissions from the application of architectural coatings.

In 2019, CARB amended the Architectural Coatings SCM to further reduce VOC limits for specific categories and to add VOC limits for colorants. CARB estimated that the 2019 SCM will achieve a 7.83% overall reduction in VOC emissions from architectural coatings (excluding emissions from thinning and cleanup solvents) for districts with rules based on the previous 2007 SCM. Each of the air districts in the SFNA has an existing architectural coating rule based on CARB'S 2007 SCM.

The contingency measures provisions will incorporate CARB's 2019 SCM for Architectural Coatings. The following is a summary of proposed changes that would take effect upon triggering the contingency measures:

- 1. Add, amend, or eliminate certain coating categories, consistent with CARB's 2019 SCM for architectural coatings
- 2. Establish VOC limits for colorants added to coatings at the point of sale, excluding industrial maintenance coatings and wood coatings
- 3. Reduce the VOC limits for nine coating categories
- 4. Eliminate the nonflat high gloss specialty coating category. These coatings will become subject to the nonflat coatings limits
- 5. Establish a one-year sell-through period for products manufactured prior to the contingency measure trigger date

The contingency measure will be adopted by each air district and will be submitted to CARB and EPA for approval and incorporation into the California SIP.

#### E.2.3. Emissions Impact

The total amount of reductions depends on if or when the contingency measures are triggered. Because the contingency measures will include a one-year sell-through period, emission reductions will begin in the second year after the measure is triggered. Table E-3 shows the VOC emissions inventory for each SFNA air district, and Table E-4 shows the estimated emissions reductions for each air district's contingency measure commitment if it were triggered in the potential milestone years or attainment year<sup>1</sup>.

<sup>&</sup>lt;sup>1</sup> The contingency measure for each District could potentially be triggered in the milestone years, 2026 and 2029, or the year of the attainment date, 2033 (based on air quality monitoring data collected in 2030, 2031, and 2032). VOC emission reductions would begin in the second year after the measure is triggered: 2028, 2031, or 2035.

## E.2.4. Summary of District Emission Inventory – Year 2028, 2031, 2035

District	VOC Emission Inventory for Contingency Measure (tons per summer day) <sup>a</sup>				
	2028	2031	2035		
EDAQMD	0.0332	0.0341	0.0348		
FRAQMD	0.0041	0.0042	0.0043		
PCAPCD	0.0527	0.0548	0.0569		
SMAQMD	1.5228	1.5638	1.6090		
YSAQMD	0.3498	0.3582	0.3696		
Total SFNA Contingency Measure Emission Inventory	1.9625	2.0151	2.0746		

#### Table E-3: Architectural Coating Emissions Inventory

<sup>a</sup> Excluding thinning and cleanup solvents.

#### E.2.5. Emission Reductions – Year 2028, 2031, 2035

Reductions are based on the 2019 SCM estimated overall reduction of VOC emissions by 7.83%. The overall reduction is not applicable to the Emission Inventory Codes (EICs) for thinning or cleanup solvents, or additives.

District	VOC Emission Reductions (tons per summer day)			
	2028	2031	2035	
EDCAQMD	0.0026	0.0027	0.0027	
FRAQMD	0.0003	0.0003	0.0003	
PCAPCD	0.0041	0.0043	0.0045	
SMAQMD	0.1192	0.1224	0.1260	
YSAQMD	0.0274	0.0280	0.0289	
Total SFNA Contingency Measure Emission Reductions	0.1537	0.1578	0.1624	

Below is each district's architectural coating inventory by EICs subject to the contingency measure.

# E.2.6. EDAQMD Emission Inventory – Year 2028, 2031, 2035

District EIC codes		Description	Contin	nission Inven gency Measu	re (tpd)
			2028	2031	2035
EDAQMD	520-520-9100-0000	9100-OIL BASED (ORGANIC SOLVENT BASED) COATINGS (UNSPECIFIED)	0.000	0.000	0.000
EDAQMD	520-520-9105-0000	9105-OIL BASED PRIMERS_SEALERS_AND_UNDERCOATERS	0.000	0.000	0.000
EDAQMD	520-520-9106-0000	9106-OIL BASED QUICK DRY PRIMERS_SEALERS_AND_UNDERCOATERS	0.000	0.000	0.000
EDAQMD	520-520-9108-0000	9108-OIL BASED SPECIALTY PRIMER_SEALER_AND_UNDERCOATER	0.000	0.000	0.000
EDAQMD	520-520-9109-0000	9109-OIL BASED BITUMINOUS ROOF PRIMER	0.000	0.000	0.000
EDAQMD	520-520-9112-0000	9112-OIL BASED SANDING SEALERS	0.000	0.000	0.000
EDAQMD	520-520-9113-0000	9113-OIL BASED WATERPROOFING SEALERS	0.001	0.001	0.001
EDAQMD	520-520-9118-0000	9118-OIL BASED WATERPROOFING CONCRETE/MASONRY SEALERS	0.001	0.002	0.002
EDAQMD	520-520-9122-0000	9122-OIL BASED FAUX FINISHING	0.000	0.000	0.000
EDAQMD	520-520-9124-0000	9124-OIL BASED MASTIC TEXTURE	0.000	0.000	0.000
EDAQMD	520-520-9126-0000	9126-OIL BASED RUST PREVENTATIVE	0.001	0.001	0.001
EDAQMD	520-520-9131-0000	9131-OIL BASED STAINS - CLEAR/SEMITRANSPARENT	0.004	0.004	0.004
EDAQMD	520-520-9136-0000	9136-OIL BASED STAINS - OPAQUE	0.001	0.001	0.001
EDAQMD	520-520-9141-0000	9141-OIL BASED VARNISH - CLEAR/SEMITRANSPARENT	0.003	0.004	0.004
EDAQMD	520-520-9153-0000	9153-OIL BASED QUICK DRY ENAMEL COATINGS	0.000	0.000	0.000
EDAQMD	520-520-9157-0000	9157-OIL BASED LACQUERS (UNSPECIFIED)	0.000	0.000	0.000
EDAQMD	520-520-9159-0000	9159-OIL BASED FLAT COATINGS	0.000	0.000	0.000
EDAQMD	520-520-9160-0000	9160-OIL BASED NONFLAT - LOW GLOSS/MEDIUM GLOSS	0.001	0.001	0.001
EDAQMD	520-520-9161-0000	9161-OIL BASED HIGH GLOSS NONFLAT COATINGS	0.000	0.000	0.000
EDAQMD	520-520-9164-0000	9164-OIL BASED BITUMINOUS ROOF COATINGS	0.000	0.000	0.000
EDAQMD	520-520-9165-0000	9165-OIL BASED CONCRETE CURING COMPOUNDS	0.000	0.000	0.000
EDAQMD	520-520-9166-0000	9166-OIL BASED DRY FOG COATINGS	0.000	0.000	0.000
EDAQMD	520-520-9169-0000	9169-OIL BASED FLOOR COATINGS	0.000	0.000	0.000
EDAQMD	520-520-9170-0000	9170-OIL BASED FORM RELEASE COATINGS	0.000	0.000	0.000
EDAQMD	520-520-9171-0000	9171-OIL BASED HIGH TEMPERATURE COATINGS	0.000	0.000	0.000
EDAQMD	520-520-9172-0000	9172-OIL BASED INDUSTRIAL MAINTENANCE COATINGS	0.003	0.003	0.003
EDAQMD	520-520-9173-0000	9173-OIL BASED METALLIC PIGMENTED COATINGS	0.000	0.000	0.000
EDAQMD	520-520-9174-0000	9174-OIL BASED ROOF COATINGS	0.000	0.000	0.000
EDAQMD	520-520-9176-0000	9176-OIL BASED TRAFFIC COATINGS	0.000	0.000	0.000
EDAQMD	520-520-9177-0000	9177-OIL BASED WOOD PRESERVATIVES	0.001	0.001	0.001
EDAQMD	520-520-9200-0000	9200-WATER BASED COATINGS (UNSPECIFIED)	0.001	0.001	0.001
EDAQMD	520-520-9205-0000	9205-WATER BASED PRIMERS_SEALERS_AND_UNDERCOATERS	0.002	0.002	0.002
EDAQMD	520-520-9206-0000	9206-WATER BASED QUICK DRY PRIMERS_SEALERS_AND_UNDERCOATERS	0.000	0.000	0.000
EDAQMD	520-520-9208-0000	9208-WATER BASED SPECIALTY PRIMER SEALER AND UNDERCOATER	0.000	0.000	0.000
EDAQMD	520-520-9209-0000	9209-WATER BASED BITUMINOUS ROOF PRIMER	0.000	0.000	0.000
EDAQMD	520-520-9212-0000	9212-WATER BASED SANDING SEALERS	0.000	0.000	0.000
EDAQMD	520-520-9213-0000	9213-WATER BASED WATERPROOFING SEALERS	0.000	0.000	0.000
EDAQMD	520-520-9218-0000	9218-WATER BASED WATERPROOFING	0.000	0.000	0.000
EDAQMD	520-520-9222-0000	CONCRETE/MASONRY SEALERS 9222-WATER BASED FAUX FINISHING	0.000	0.000	0.000
EDAQMD	520-520-9223-0000	9223-WATER BASED FORM RELEASE COMPOUNDS	0.000	0.000	0.000
	520-520-9223-0000	9223-WATER BASED FORM RELEASE COMPOUNDS 9224-WATER BASED MASTIC TEXTURE	0.000	0.000	0.000
	520-520-9226-0000	9226-WATER BASED RUST PREVENTATIVE	0.000	0.000	0.000
EDAQMD	520-520-9231-0000	9220-WATER BASED RUST PREVENTATIVE 9231-WATER BASED STAINS - CLEAR/SEMITRANSPARENT	0.000	0.000	0.000
EDAQMD	520-520-9236-0000	9236-WATER BASED STAINS - CLEAR/SEMITRANSPARENT	0.000	0.000	0.000
	520-520-9241-0000	9241-WATER BASED VARNISHES - CLEAR/SEMITRANSPARENT	0.000	0.000	0.000
EDAQMD	520-520-9257-0000	9257-WATER BASED LACQUERS (UNSPECIFIED)	0.000	0.000	0.000
EDAQMD	520-520-9259-0000	9259-WATER BASED FLAT COATINGS	0.002	0.002	0.003
EDAQMD	520-520-9260-0000	9260-WATER BASED NONFLAT - LOW GLOSS/MEDIUM GLOSS	0.003	0.003	0.003
EDAQMD	520-520-9261-0000	9261-WATER BASED HIGH GLOSS NONFLAT COATINGS	0.000	0.000	0.000
EDAQMD	520-520-9264-0000	9264-WATER BASED BITUMINOUS ROOF COATINGS	0.001	0.001	0.001
EDAQMD	520-520-9265-0000	9265-WATER BASED CONCRETE CURING COMPOUNDS	0.001	0.001 0.000	0.001
EDAQMD	520-520-9266-0000	9266-WATER BASED DRY FOG COATINGS 9269-WATER BASED FLOOR COATINGS			0.000
EDAQMD EDAQMD	520-520-9269-0000 520-520-9272-0000	9272-WATER BASED INDUSTRIAL MAINTENANCE	0.000	0.000	0.000
EDAQMD	520-520-9273-0000	COATINGS 9273-WATER BASED METALLIC PIGMENTED COATINGS	0.000	0.000	0.000
EDAQMD	520-520-9274-0000	9274-WATER BASED ROOF COATINGS	0.000	0.000	0.000
EDAQMD	520-520-9276-0000	9276-WATER BASED TRAFFIC COATINGS	0.001	0.001	0.001

District	EIC codes	Description	VOC Emission Inventory f Contingency Measure (tp		
			2028	2028 2031 203	2035
EDAQMD	520-520-9277-0000	9277-WATER BASED WOOD PRESERVATIVES	0.000	0.000	0.000
EDAQMD	520-520-9281-0000	9281-COLORANT - EXCLUDING IM COATINGS (50 G/L)	0.001	0.001	0.001
EDAQMD	520-520-9282-0000	9282-COLORANT - SOLVENT BASED IM COATINGS	0.000	0.000	0.000
		Total	0.0332	0.0341	0.0348

## E.2.7. FRAQMD Emission Inventory – Year 2028, 2031, 2035

District	EIC codes	Description		nission Inven gency Measu	
			2028	2031	2035
FRAQMD	520-520-9100-0000	9100-OIL BASED (ORGANIC SOLVENT BASED) COATINGS (UNSPECIFIED)	0.0000	0.0000	0.0000
FRAQMD	520-520-9105-0000	9105-OIL BASED PRIMERS_SEALERS_AND_UNDERCOATERS	0.0000	0.0000	0.0000
FRAQMD	520-520-9106-0000	9106-OIL BASED QUICK DRY PRIMERS_SEALERS_AND_UNDERCOATERS	0.0000	0.0000	0.0000
FRAQMD	520-520-9108-0000	9108-OIL BASED SPECIALTY PRIMER SEALER AND UNDERCOATER	0.0000	0.0000	0.0000
FRAQMD	520-520-9109-0000	9109-OIL BASED BITUMINOUS ROOF PRIMER	0.0000	0.0000	0.0000
FRAQMD	520-520-9112-0000	9112-OIL BASED SANDING SEALERS	0.0000	0.0000	0.0000
FRAQMD	520-520-9113-0000	9113-OIL BASED WATERPROOFING SEALERS	0.0001	0.0001	0.0001
FRAQMD	520-520-9118-0000	9118-OIL BASED WATERPROOFING CONCRETE/MASONRY SEALERS	0.0002	0.0002	0.0002
FRAQMD	520-520-9122-0000	9122-OIL BASED FAUX FINISHING	0.0000	0.0000	0.0000
FRAQMD	520-520-9124-0000	9124-OIL BASED MASTIC TEXTURE	0.0000	0.0000	0.0000
FRAQMD	520-520-9126-0000	9126-OIL BASED RUST PREVENTATIVE	0.0001	0.0001	0.0001
FRAQMD	520-520-9131-0000	9131-OIL BASED STAINS - CLEAR/SEMITRANSPARENT	0.0005	0.0005	0.0005
FRAQMD	520-520-9136-0000	9136-OIL BASED STAINS - OPAQUE	0.0001	0.0001	0.0002
FRAQMD	520-520-9141-0000	9141-OIL BASED VARNISH - CLEAR/SEMITRANSPARENT	0.0004	0.0004	0.0004
FRAQMD	520-520-9153-0000	9153-OIL BASED QUICK DRY ENAMEL COATINGS	0.0000	0.0000	0.0000
FRAQMD	520-520-9157-0000	9157-OIL BASED LACQUERS (UNSPECIFIED)	0.0000	0.0000	0.0000
FRAQMD	520-520-9159-0000	9159-OIL BASED FLAT COATINGS	0.0000	0.0000	0.0000
FRAQMD	520-520-9160-0000	9160-OIL BASED NONFLAT - LOW GLOSS/MEDIUM GLOSS	0.0001	0.0001	0.0001
FRAQMD	520-520-9161-0000	9161-OIL BASED HIGH GLOSS NONFLAT COATINGS	0.0000	0.0000	0.0000
FRAQMD	520-520-9164-0000	9164-OIL BASED BITUMINOUS ROOF COATINGS	0.0000	0.0000	0.0000
FRAQMD	520-520-9165-0000	9165-OIL BASED CONCRETE CURING COMPOUNDS	0.0000	0.0000	0.0000
FRAQMD	520-520-9166-0000	9166-OIL BASED DRY FOG COATINGS	0.0000	0.0000	0.0000
FRAQMD	520-520-9169-0000	9169-OIL BASED FLOOR COATINGS	0.0000	0.0000	0.0000
FRAQMD	520-520-9170-0000	9170-OIL BASED FORM RELEASE COATINGS	0.0000	0.0000	0.0000
FRAQMD	520-520-9171-0000	9171-OIL BASED HIGH TEMPERATURE COATINGS	0.0000	0.0000	0.0000
FRAQMD	520-520-9172-0000	9172-OIL BASED INDUSTRIAL MAINTENANCE COATINGS	0.0004	0.0004	0.0004
FRAQMD FRAQMD	520-520-9173-0000	9173-OIL BASED METALLIC PIGMENTED COATINGS	0.0000	0.0000 0.0000	0.0000
FRAQMD	520-520-9174-0000 520-520-9176-0000	9174-OIL BASED ROOF COATINGS 9176-OIL BASED TRAFFIC COATINGS	0.0000 0.0000	0.0000	0.0000
FRAQMD	520-520-9177-0000	9177-OIL BASED WOOD PRESERVATIVES	0.0000	0.0000	0.0000
FRAQMD	520-520-9200-0000	9200-WATER BASED COATINGS (UNSPECIFIED)	0.0001	0.0001	0.0001
FRAQMD	520-520-9205-0000	9205-WATER BASED COATINGS (UNSPECIALD) 9205-WATER BASED PRIMERS_SEALERS_AND_UNDERCOATERS	0.0001	0.0001	0.0002
FRAQMD	520-520-9206-0000	9206-WATER BASED QUICK DRY	0.0000	0.0000	0.0000
FRAQMD	520-520-9208-0000	PRIMERS_SEALERS_AND_UNDERCOATERS 9208-WATER BASED SPECIALTY	0.0000	0.0000	0.0000
FRAQMD	520-520-9209-0000	PRIMER_SEALER_AND_UNDERCOATER 9209-WATER BASED BITUMINOUS ROOF PRIMER	0.0000	0.0000	0.0000
FRAQMD	520-520-9212-0000	9212-WATER BASED SANDING SEALERS	0.0000	0.0000	0.0000
FRAQMD	520-520-9213-0000	9213-WATER BASED WATERPROOFING SEALERS	0.0000	0.0000	0.0000
FRAQMD	520-520-9218-0000	9218-WATER BASED WATERPROOFING CONCRETE/MASONRY SEALERS	0.0001	0.0001	0.0001
FRAQMD	520-520-9222-0000	9222-WATER BASED FAUX FINISHING	0.0000	0.0000	0.0000
FRAQMD	520-520-9223-0000	9223-WATER BASED FORM RELEASE COMPOUNDS	0.0000	0.0000	0.0000
FRAQMD	520-520-9224-0000	9224-WATER BASED MASTIC TEXTURE	0.0000	0.0000	0.0000
FRAQMD	520-520-9226-0000	9226-WATER BASED RUST PREVENTATIVE	0.0000	0.0000	0.0000
FRAQMD	520-520-9231-0000	9231-WATER BASED STAINS - CLEAR/SEMITRANSPARENT	0.0000	0.0000	0.0000
FRAQMD FRAQMD	520-520-9236-0000 520-520-9241-0000	9236-WATER BASED STAINS - OPAQUE 9241-WATER BASED VARNISHES -	0.0000	0.0000	0.0000
		CLEAR/SEMITRANSPARENT			
FRAQMD	520-520-9257-0000	9257-WATER BASED LACQUERS (UNSPECIFIED)	0.0000	0.0000	0.0000
FRAQMD	520-520-9259-0000	9259-WATER BASED FLAT COATINGS	0.0003	0.0003	0.0003
FRAQMD	520-520-9260-0000	9260-WATER BASED NONFLAT - LOW GLOSS/MEDIUM GLOSS	0.0004	0.0004	0.0004
FRAQMD	520-520-9261-0000	9261-WATER BASED HIGH GLOSS NONFLAT COATINGS	0.0000	0.0000	0.0000
FRAQMD	520-520-9264-0000	9264-WATER BASED BITUMINOUS ROOF COATINGS	0.0001	0.0001	0.0001

District	EIC codes	Description	VOC Emission Invento Contingency Measure		
			2028	2031	2035
FRAQMD	520-520-9265-0000	9265-WATER BASED CONCRETE CURING COMPOUNDS	0.0001	0.0001	0.0001
FRAQMD	520-520-9266-0000	9266-WATER BASED DRY FOG COATINGS	0.0000	0.0000	0.0000
FRAQMD	520-520-9269-0000	9269-WATER BASED FLOOR COATINGS	0.0000	0.0000	0.0000
FRAQMD	520-520-9272-0000	9272-WATER BASED INDUSTRIAL MAINTENANCE COATINGS	0.0001	0.0001	0.0001
FRAQMD	520-520-9273-0000	9273-WATER BASED METALLIC PIGMENTED COATINGS	0.0000	0.0000	0.0000
FRAQMD	520-520-9274-0000	9274-WATER BASED ROOF COATINGS	0.0000	0.0000	0.0000
FRAQMD	520-520-9276-0000	9276-WATER BASED TRAFFIC COATINGS	0.0001	0.0001	0.0001
FRAQMD	520-520-9277-0000	9277-WATER BASED WOOD PRESERVATIVES	0.0000	0.0000	0.0000
FRAQMD	520-520-9281-0000	9281-COLORANT - EXCLUDING IM COATINGS (50 G/L)	0.0001	0.0001	0.0001
FRAQMD	520-520-9282-0000	9282-COLORANT - SOLVENT BASED IM COATINGS	0.0000	0.0000	0.0000
		Total	0.0041	0.0042	0.0043

# E.2.8. PCAPCD Emission Inventory –Year 2028, 2031, 2035

District EIC	EIC codes	Description	VOC Emission Inventory for Contingency Measure (tpd)		
			2028	2031	2035
PCAPCD	520-520-9100-0000	9100-OIL BASED (ORGANIC SOLVENT BASED) COATINGS (UNSPECIFIED)	0.0005	0.0005	0.0005
PCAPCD	520-520-9105-0000	9105-OIL BASED PRIMERS_SEALERS_AND_UNDERCOATERS	0.0001	0.0001	0.0001
PCAPCD	520-520-9106-0000	9106-OIL BASED QUICK DRY PRIMERS_SEALERS_AND_UNDERCOATERS	0.0000	0.0000	0.0000
PCAPCD	520-520-9108-0000	9108-OIL BASED SPECIALTY PRIMER_SEALER_AND_UNDERCOATER	0.0013	0.0013	0.0014
PCAPCD	520-520-9109-0000	9109-OIL BASED BITUMINOUS ROOF PRIMER	0.0002	0.0002	0.0002
PCAPCD	520-520-9112-0000	9112-OIL BASED SANDING SEALERS	0.0000	0.0000	0.0000
PCAPCD	520-520-9113-0000	9113-OIL BASED WATERPROOFING SEALERS	0.0014	0.0014	0.0015
PCAPCD	520-520-9118-0000	9118-OIL BASED WATERPROOFING CONCRETE/MASONRY SEALERS	0.0029	0.0030	0.0031
PCAPCD	520-520-9122-0000	9122-OIL BASED FAUX FINISHING	0.0001	0.0001	0.0001
PCAPCD	520-520-9124-0000	9124-OIL BASED MASTIC TEXTURE	0.0001	0.0001	0.0001
PCAPCD	520-520-9126-0000	9126-OIL BASED RUST PREVENTATIVE	0.0020	0.0021	0.0022
PCAPCD	520-520-9131-0000	9131-OIL BASED STAINS - CLEAR/SEMITRANSPARENT	0.0054	0.0056	0.0058
PCAPCD	520-520-9136-0000	9136-OIL BASED STAINS - OPAQUE	0.0015	0.0016	0.0016
PCAPCD	520-520-9141-0000	9141-OIL BASED VARNISH - CLEAR/SEMITRANSPARENT	0.0056	0.0058	0.0060
PCAPCD	520-520-9153-0000	9153-OIL BASED QUICK DRY ENAMEL COATINGS	0.0000	0.0000	0.0000
PCAPCD	520-520-9157-0000	9157-OIL BASED LACQUERS (UNSPECIFIED)	0.0007	0.0007	0.0008
PCAPCD	520-520-9159-0000	9159-OIL BASED FLAT COATINGS	0.0001	0.0001	0.0001
PCAPCD	520-520-9160-0000	9160-OIL BASED NONFLAT - LOW GLOSS/MEDIUM GLOSS	0.0009	0.0009	0.0010
PCAPCD	520-520-9161-0000	9161-OIL BASED HIGH GLOSS NONFLAT COATINGS	0.0004	0.0004	0.0004
PCAPCD	520-520-9164-0000	9164-OIL BASED BITUMINOUS ROOF COATINGS	0.0002	0.0002	0.0002
PCAPCD	520-520-9165-0000	9165-OIL BASED CONCRETE CURING COMPOUNDS	0.0000	0.0000	0.0000
PCAPCD	520-520-9166-0000	9166-OIL BASED DRY FOG COATINGS	0.0000	0.0000	0.0000
PCAPCD	520-520-9169-0000	9169-OIL BASED FLOOR COATINGS	0.0003	0.0003	0.0003
PCAPCD	520-520-9170-0000	9170-OIL BASED FORM RELEASE COATINGS	0.0001	0.0001	0.0001
PCAPCD	520-520-9171-0000	9171-OIL BASED HIGH TEMPERATURE COATINGS	0.0001	0.0001	0.0001
PCAPCD	520-520-9172-0000	9172-OIL BASED INDUSTRIAL MAINTENANCE COATINGS	0.0041	0.0043	0.0045
PCAPCD	520-520-9173-0000	9173-OIL BASED METALLIC PIGMENTED COATINGS	0.0003	0.0003	0.0003
PCAPCD	520-520-9174-0000	9174-OIL BASED ROOF COATINGS	0.0000	0.0000	0.0000
PCAPCD	520-520-9176-0000	9176-OIL BASED TRAFFIC COATINGS	0.0001	0.0001	0.0001
PCAPCD	520-520-9177-0000	9177-OIL BASED WOOD PRESERVATIVES	0.0008	0.0009	0.0009
PCAPCD	520-520-9200-0000	9200-WATER BASED COATINGS (UNSPECIFIED)	0.0015	0.0016	0.0016
PCAPCD	520-520-9205-0000	9205-WATER BASED PRIMERS_SEALERS_AND_UNDERCOATERS	0.0032	0.0033	0.0035
PCAPCD	520-520-9206-0000	9206-WATER BASED QUICK DRY PRIMERS_SEALERS_AND_UNDERCOATERS	0.0000	0.0000	0.0000
PCAPCD	520-520-9208-0000	9208-WATER BASED SPECIALTY PRIMER_SEALER_AND_UNDERCOATER	0.0000	0.0000	0.0000
PCAPCD	520-520-9209-0000	9209-WATER BASED BITUMINOUS ROOF PRIMER	0.0000	0.0000	0.0000
PCAPCD	520-520-9212-0000	9212-WATER BASED SANDING SEALERS	0.0000	0.0000	0.0000
PCAPCD	520-520-9213-0000	9213-WATER BASED WATERPROOFING SEALERS	0.0005	0.0005	0.0005
PCAPCD	520-520-9218-0000	9218-WATER BASED WATERPROOFING CONCRETE/MASONRY SEALERS	0.0010	0.0010	0.0011
PCAPCD	520-520-9222-0000	9222-WATER BASED FAUX FINISHING	0.0001	0.0001	0.0001
PCAPCD	520-520-9223-0000	9223-WATER BASED FORM RELEASE COMPOUNDS	0.0001	0.0001	0.0001
PCAPCD	520-520-9224-0000	9224-WATER BASED MASTIC TEXTURE	0.0000	0.0000	0.0000
PCAPCD	520-520-9226-0000	9226-WATER BASED RUST PREVENTATIVE	0.0000	0.0000	0.0000
PCAPCD	520-520-9231-0000	9231-WATER BASED STAINS - CLEAR/SEMITRANSPARENT	0.0001	0.0001	0.0001
PCAPCD	520-520-9236-0000	9236-WATER BASED STAINS - OPAQUE	0.0004	0.0004	0.0004

District EIC codes		Description	VOC Emission Inventory for Contingency Measure (tpd)		
			2028	2031	2035
PCAPCD	520-520-9241-0000	9241-WATER BASED VARNISHES - CLEAR/SEMITRANSPARENT	0.0008	0.0008	0.0008
PCAPCD	520-520-9257-0000	9257-WATER BASED LACQUERS (UNSPECIFIED)	0.0001	0.0001	0.0001
PCAPCD	520-520-9259-0000	9259-WATER BASED FLAT COATINGS	0.0053	0.0055	0.0057
PCAPCD	520-520-9260-0000	9260-WATER BASED NONFLAT - LOW GLOSS/MEDIUM GLOSS	0.0050	0.0052	0.0054
PCAPCD	520-520-9261-0000	9261-WATER BASED HIGH GLOSS NONFLAT COATINGS	0.0005	0.0005	0.0005
PCAPCD	520-520-9264-0000	9264-WATER BASED BITUMINOUS ROOF COATINGS	0.0007	0.0007	0.0007
PCAPCD	520-520-9265-0000	9265-WATER BASED CONCRETE CURING COMPOUNDS	0.0014	0.0015	0.0016
PCAPCD	520-520-9266-0000	9266-WATER BASED DRY FOG COATINGS	0.0002	0.0002	0.0002
PCAPCD	520-520-9269-0000	9269-WATER BASED FLOOR COATINGS	0.0002	0.0002	0.0002
PCAPCD	520-520-9272-0000	9272-WATER BASED INDUSTRIAL MAINTENANCE COATINGS	0.0005	0.0006	0.0006
PCAPCD	520-520-9273-0000	9273-WATER BASED METALLIC PIGMENTED COATINGS	0.0000	0.0000	0.0000
PCAPCD	520-520-9274-0000	9274-WATER BASED ROOF COATINGS	0.0000	0.0000	0.0000
PCAPCD	520-520-9276-0000	9276-WATER BASED TRAFFIC COATINGS	0.0007	0.0008	0.0008
PCAPCD	520-520-9277-0000	9277-WATER BASED WOOD PRESERVATIVES	0.0000	0.0000	0.0000
PCAPCD	520-520-9281-0000	9281-COLORANT - EXCLUDING IM COATINGS (50 G/L)	0.0011	0.0011	0.0011
PCAPCD	520-520-9282-0000	9282-COLORANT - SOLVENT BASED IM COATINGS	0.0002	0.0002	0.0002
		Total	0.0527	0.0548	0.0569

# E.2.9. SMAQMD Emission Inventory –Year 2028, 2031, 2035

District	EIC codes	Description	VOC Emission Inventory for Contingency Measure (tpd)		
			2028	2031	2035
SMAQMD	520-520-9100-0000	9100-OIL BASED (ORGANIC SOLVENT BASED) COATINGS (UNSPECIFIED)	0.0164	0.0168	0.0173
SMAQMD	520-520-9105-0000	9105-OIL BASED PRIMERS_SEALERS_AND_UNDERCOATERS	0.0019	0.0019	0.0020
SMAQMD	520-520-9106-0000	9106-OIL BASED QUICK DRY PRIMERS SEALERS AND UNDERCOATERS	0.0002	0.0002	0.0002
SMAQMD	520-520-9108-0000	9108-OIL BASED SPECIALTY PRIMER_SEALER_AND_UNDERCOATER	0.0089	0.0091	0.0094
SMAQMD	520-520-9109-0000	9109-OIL BASED BITUMINOUS ROOF PRIMER	0.0059	0.0060	0.0062
SMAQMD	520-520-9112-0000	9112-OIL BASED SANDING SEALERS	0.0014	0.0014	0.0014
SMAQMD	520-520-9113-0000	9113-OIL BASED WATERPROOFING SEALERS	0.0440	0.0452	0.0466
SMAQMD	520-520-9118-0000	9118-OIL BASED WATERPROOFING CONCRETE/MASONRY SEALERS	0.0676	0.0695	0.0716
SMAQMD	520-520-9122-0000	9122-OIL BASED FAUX FINISHING	0.0019	0.0020	0.0020
SMAQMD	520-520-9124-0000	9124-OIL BASED MASTIC TEXTURE	0.0014	0.0015	0.0015
SMAQMD	520-520-9126-0000	9126-OIL BASED RUST PREVENTATIVE	0.0337	0.0346	0.0356
SMAQMD	520-520-9131-0000	9131-OIL BASED STAINS - CLEAR/SEMITRANSPARENT	0.1927	0.1981	0.2040
SMAQMD	520-520-9136-0000	9136-OIL BASED STAINS - OPAQUE	0.0537	0.0552	0.0569
SMAQMD	520-520-9141-0000	9141-OIL BASED VARNISH - CLEAR/SEMITRANSPARENT	0.1594	0.1638	0.1687
SMAQMD	520-520-9153-0000	9153-OIL BASED QUICK DRY ENAMEL COATINGS	0.0004	0.0005	0.0005
SMAQMD	520-520-9157-0000	9157-OIL BASED LACQUERS (UNSPECIFIED)	0.0073	0.0075	0.0077
SMAQMD	520-520-9159-0000	9159-OIL BASED FLAT COATINGS	0.0039	0.0040	0.0041
SMAQMD	520-520-9160-0000	9160-OIL BASED NONFLAT - LOW GLOSS/MEDIUM GLOSS	0.0293	0.0301	0.0310
SMAQMD	520-520-9161-0000	9161-OIL BASED HIGH GLOSS NONFLAT COATINGS	0.0112	0.0115	0.0118
SMAQMD	520-520-9164-0000	9164-OIL BASED BITUMINOUS ROOF COATINGS	0.0012	0.0012	0.0013
SMAQMD	520-520-9165-0000	9165-OIL BASED CONCRETE CURING COMPOUNDS	0.0002	0.0002	0.0003
SMAQMD	520-520-9166-0000	9166-OIL BASED DRY FOG COATINGS	0.0001	0.0001	0.0001
SMAQMD	520-520-9169-0000	9169-OIL BASED FLOOR COATINGS	0.0046	0.0048	0.0049
SMAQMD	520-520-9170-0000	9170-OIL BASED FORM RELEASE COATINGS	0.0044	0.0045	0.0046
SMAQMD	520-520-9171-0000	9171-OIL BASED HIGH TEMPERATURE COATINGS	0.0023	0.0023	0.0024
SMAQMD	520-520-9172-0000	9172-OIL BASED INDUSTRIAL MAINTENANCE COATINGS	0.1486	0.1528	0.1574
SMAQMD	520-520-9173-0000	9173-OIL BASED METALLIC PIGMENTED COATINGS	0.0081	0.0083	0.0086
SMAQMD	520-520-9174-0000	9174-OIL BASED ROOF COATINGS	0.0000	0.0000	0.0000
SMAQMD	520-520-9176-0000	9176-OIL BASED TRAFFIC COATINGS	0.0027	0.0027	0.0028
SMAQMD	520-520-9177-0000	9177-OIL BASED WOOD PRESERVATIVES	0.0305	0.0314	0.0323
SMAQMD	520-520-9200-0000	9200-WATER BASED COATINGS (UNSPECIFIED)	0.0537	0.0551	0.0568
SMAQMD	520-520-9205-0000	9205-WATER BASED PRIMERS_SEALERS_AND_UNDERCOATERS	0.0809	0.0831	0.0856
SMAQMD	520-520-9206-0000	9206-WATER BASED QUICK DRY PRIMERS_SEALERS_AND_UNDERCOATERS	0.0008	0.0008	0.0008
SMAQMD	520-520-9208-0000	9208-WATER BASED SPECIALTY PRIMER SEALER AND UNDERCOATER	0.0010	0.0011	0.0011
SMAQMD	520-520-9209-0000	9209-WATER BASED BITUMINOUS ROOF PRIMER	0.0000	0.0000	0.0000
SMAQMD	520-520-9212-0000	9212-WATER BASED SANDING SEALERS	0.0008	0.0008	0.0008
SMAQMD	520-520-9213-0000	9213-WATER BASED WATERPROOFING SEALERS	0.0162	0.0166	0.0171

District	EIC codes	Description	VOC Emission Inventory for Contingency Measure (tpd)		
			2028	2031	2035
SMAQMD	520-520-9218-0000	9218-WATER BASED WATERPROOFING CONCRETE/MASONRY SEALERS	0.0209	0.0214	0.0221
SMAQMD	520-520-9222-0000	9222-WATER BASED FAUX FINISHING	0.0037	0.0038	0.0039
SMAQMD	520-520-9223-0000	9223-WATER BASED FORM RELEASE COMPOUNDS	0.0035	0.0036	0.0037
SMAQMD	520-520-9224-0000	9224-WATER BASED MASTIC TEXTURE	0.0015	0.0016	0.0016
SMAQMD	520-520-9226-0000	9226-WATER BASED RUST PREVENTATIVE	0.0011	0.0012	0.0012
SMAQMD	520-520-9231-0000	9231-WATER BASED STAINS - CLEAR/SEMITRANSPARENT	0.0036	0.0037	0.0038
SMAQMD	520-520-9236-0000	9236-WATER BASED STAINS - OPAQUE	0.0133	0.0137	0.0141
SMAQMD	520-520-9241-0000	9241-WATER BASED VARNISHES - CLEAR/SEMITRANSPARENT	0.0274	0.0282	0.0290
SMAQMD	520-520-9257-0000	9257-WATER BASED LACQUERS (UNSPECIFIED)	0.0027	0.0028	0.0029
SMAQMD	520-520-9259-0000	9259-WATER BASED FLAT COATINGS	0.1114	0.1145	0.1179
SMAQMD	520-520-9260-0000	9260-WATER BASED NONFLAT - LOW GLOSS/MEDIUM GLOSS	0.1395	0.1434	0.1476
SMAQMD	520-520-9261-0000	9261-WATER BASED HIGH GLOSS NONFLAT COATINGS	0.0148	0.0152	0.0156
SMAQMD	520-520-9264-0000	9264-WATER BASED BITUMINOUS ROOF COATINGS	0.0231	0.0237	0.0245
SMAQMD	520-520-9265-0000	9265-WATER BASED CONCRETE CURING COMPOUNDS	0.0520	0.0535	0.0551
SMAQMD	520-520-9266-0000	9266-WATER BASED DRY FOG COATINGS	0.0035	0.0035	0.0037
SMAQMD	520-520-9269-0000	9269-WATER BASED FLOOR COATINGS	0.0072	0.0074	0.0076
SMAQMD	520-520-9272-0000	9272-WATER BASED INDUSTRIAL MAINTENANCE COATINGS	0.0196	0.0201	0.0207
SMAQMD	520-520-9273-0000	9273-WATER BASED METALLIC PIGMENTED COATINGS	0.0000	0.0000	0.0000
SMAQMD	520-520-9274-0000	9274-WATER BASED ROOF COATINGS	0.0003	0.0004	0.0004
SMAQMD	520-520-9276-0000	9276-WATER BASED TRAFFIC COATINGS		0.0261	0.0269
SMAQMD	520-520-9277-0000	9277-WATER BASED WOOD PRESERVATIVES	0.0002	0.0002	0.0002
SMAQMD	520-520-9281-0000	9281-COLORANT - EXCLUDING IM COATINGS (50 G/L)	0.0450	0.0450	0.0450
SMAQMD	520-520-9282-0000	9282-COLORANT - SOLVENT BASED IM COATINGS	0.0060	0.0060	0.0060
		Total	1.5228	1.5638	1.6090

#### E.2.10. YSAQMD Emission Inventory –Year 2028, 2031, 2035

	EIC codes	Description	VOC Emission Inventory for Contingency Measure (tpd)		
			2028	2031	2035
YSAQMD	520-520-9100-0000	9100-OIL BASED (ORGANIC SOLVENT BASED) COATINGS (UNSPECIFIED)	0.0038	0.0039	0.0040
YSAQMD	520-520-9105-0000	9105-OIL BASED PRIMERS_SEALERS_AND_UNDERCOATERS	0.0004	0.0004	0.0005
YSAQMD	520-520-9106-0000	9106-OIL BASED QUICK DRY PRIMERS_SEALERS_AND_UNDERCOATERS	0.0000	0.0000	0.0001
YSAQMD	520-520-9108-0000	9108-OIL BASED SPECIALTY PRIMER_SEALER_AND_UNDERCOATER	0.0020	0.0021	0.0022
YSAQMD	520-520-9109-0000	9109-OIL BASED BITUMINOUS ROOF PRIMER	0.0013	0.0014	0.0014
YSAQMD	520-520-9112-0000	9112-OIL BASED SANDING SEALERS	0.0003	0.0003	0.0003
YSAQMD	520-520-9113-0000	9113-OIL BASED WATERPROOFING SEALERS	0.0101	0.0104	0.0107
YSAQMD	520-520-9118-0000	9118-OIL BASED WATERPROOFING CONCRETE/MASONRY SEALERS	0.0155	0.0159	0.0164
YSAQMD	520-520-9122-0000	9122-OIL BASED FAUX FINISHING	0.0004	0.0005	0.0005
YSAQMD	520-520-9124-0000	9124-OIL BASED MASTIC TEXTURE	0.0003	0.0003	0.0003
YSAQMD	520-520-9126-0000	9126-OIL BASED RUST PREVENTATIVE	0.0077	0.0079	0.0082
YSAQMD	520-520-9131-0000	9131-OIL BASED STAINS - CLEAR/SEMITRANSPARENT	0.0442	0.0453	0.0468
YSAQMD	520-520-9136-0000	9136-OIL BASED STAINS - OPAQUE	0.0123	0.0126	0.0131
YSAQMD	520-520-9141-0000	9141-OIL BASED VARNISH - CLEAR/SEMITRANSPARENT	0.0366	0.0375	0.0387
YSAQMD	520-520-9153-0000	9153-OIL BASED QUICK DRY ENAMEL COATINGS	0.0001	0.0001	0.0001
YSAQMD	520-520-9157-0000	9157-OIL BASED LACQUERS (UNSPECIFIED)	0.0017	0.0017	0.0018
YSAQMD	520-520-9159-0000	9159-OIL BASED FLAT COATINGS	0.0009	0.0009	0.0009
YSAQMD	520-520-9160-0000	9160-OIL BASED NONFLAT - LOW GLOSS/MEDIUM GLOSS	0.0067	0.0069	0.0071
YSAQMD	520-520-9161-0000	9161-OIL BASED HIGH GLOSS NONFLAT COATINGS	0.0026	0.0026	0.0027
YSAQMD	520-520-9164-0000	9164-OIL BASED BITUMINOUS ROOF COATINGS	0.0003	0.0003	0.0003
YSAQMD	520-520-9165-0000	9165-OIL BASED CONCRETE CURING COMPOUNDS	0.0001	0.0001	0.0001
YSAQMD	520-520-9166-0000	9166-OIL BASED DRY FOG COATINGS	0.0000	0.0000	0.0000
YSAQMD	520-520-9169-0000	9169-OIL BASED FLOOR COATINGS	0.0011	0.0011	0.0011
YSAQMD	520-520-9170-0000	9170-OIL BASED FORM RELEASE COATINGS	0.0010	0.0010	0.0011
YSAQMD	520-520-9171-0000	9171-OIL BASED HIGH TEMPERATURE COATINGS	0.0005	0.0005	0.0006
YSAQMD	520-520-9172-0000	9172-OIL BASED INDUSTRIAL MAINTENANCE COATINGS	0.0341	0.0350	0.0361
YSAQMD	520-520-9173-0000	9173-OIL BASED METALLIC PIGMENTED COATINGS	0.0019	0.0019	0.0020
YSAQMD	520-520-9174-0000	9174-OIL BASED ROOF COATINGS	0.0000	0.0000	0.0000
YSAQMD	520-520-9176-0000	9176-OIL BASED TRAFFIC COATINGS	0.0006	0.0006	0.0006
YSAQMD	520-520-9177-0000	9177-OIL BASED WOOD PRESERVATIVES	0.0070	0.0072	0.0074
YSAQMD	520-520-9200-0000	9200-WATER BASED COATINGS (UNSPECIFIED)	0.0123	0.0126	0.0130

	EIC codes	Description	VOC Emission Inventory for Contingency Measure (tpd)		
			2028	2031	2035
YSAQMD	520-520-9205-0000	9205-WATER BASED PRIMERS_SEALERS_AND_UNDERCOATERS	0.0186	0.0190	0.0197
YSAQMD	520-520-9206-0000	9206-WATER BASED QUICK DRY PRIMERS_SEALERS_AND_UNDERCOATERS	0.0002	0.0002	0.0002
YSAQMD	520-520-9208-0000	9208-WATER BASED SPECIALTY PRIMER_SEALER_AND_UNDERCOATER	0.0002	0.0002	0.0003
YSAQMD	520-520-9209-0000	9209-WATER BASED BITUMINOUS ROOF PRIMER	0.0000	0.0000	0.0000
YSAQMD	520-520-9212-0000	9212-WATER BASED SANDING SEALERS	0.0002	0.0002	0.0002
YSAQMD	520-520-9213-0000	9213-WATER BASED WATERPROOFING SEALERS	0.0037	0.0038	0.0039
YSAQMD	520-520-9218-0000	9218-WATER BASED WATERPROOFING CONCRETE/MASONRY SEALERS	0.0048	0.0049	0.0051
YSAQMD	520-520-9222-0000	9222-WATER BASED FAUX FINISHING	0.0008	0.0009	0.0009
YSAQMD	520-520-9223-0000	9223-WATER BASED FORM RELEASE COMPOUNDS	0.0008	0.0008	0.0009
YSAQMD	520-520-9224-0000	9224-WATER BASED MASTIC TEXTURE	0.0004	0.0004	0.0004
YSAQMD	520-520-9226-0000	9226-WATER BASED RUST PREVENTATIVE	0.0003	0.0003	0.0003
YSAQMD	520-520-9231-0000	9231-WATER BASED STAINS - CLEAR/SEMITRANSPARENT	0.0008	0.0008	0.0009
YSAQMD	520-520-9236-0000	9236-WATER BASED STAINS - OPAQUE	0.0031	0.0031	0.0032
YSAQMD	520-520-9241-0000	9241-WATER BASED VARNISHES - CLEAR/SEMITRANSPARENT	0.0063	0.0064	0.0067
YSAQMD	520-520-9257-0000	9257-WATER BASED LACQUERS (UNSPECIFIED)	0.0006	0.0006	0.0007
YSAQMD	520-520-9259-0000	9259-WATER BASED FLAT COATINGS	0.0256	0.0262	0.0271
YSAQMD	520-520-9260-0000	9260-WATER BASED NONFLAT - LOW GLOSS/MEDIUM GLOSS	0.0320	0.0328	0.0339
YSAQMD	520-520-9261-0000	9261-WATER BASED HIGH GLOSS NONFLAT COATINGS	0.0034	0.0035	0.0036
YSAQMD	520-520-9264-0000	9264-WATER BASED BITUMINOUS ROOF COATINGS	0.0053	0.0054	0.0056
YSAQMD	520-520-9265-0000	9265-WATER BASED CONCRETE CURING COMPOUNDS	0.0119	0.0122	0.0126
YSAQMD	520-520-9266-0000	9266-WATER BASED DRY FOG COATINGS	0.0008	0.0008	0.0008
YSAQMD	520-520-9269-0000	9269-WATER BASED FLOOR COATINGS	0.0017	0.0017	0.0018
YSAQMD	520-520-9272-0000	9272-WATER BASED INDUSTRIAL MAINTENANCE COATINGS	0.0045	0.0046	0.0048
YSAQMD	520-520-9273-0000	9273-WATER BASED METALLIC PIGMENTED COATINGS	0.0000	0.0000	0.0000
YSAQMD	520-520-9274-0000	9274-WATER BASED ROOF COATINGS	0.0001	0.0001	0.0001
YSAQMD	520-520-9276-0000	9276-WATER BASED TRAFFIC COATINGS	0.0058	0.0060	0.0062
YSAQMD	520-520-9277-0000	9277-WATER BASED WOOD PRESERVATIVES	0.0000	0.0001	0.0001
YSAQMD	520-520-9281-0000	9281-COLORANT - EXCLUDING IM COATINGS (50 G/L)	0.0105	0.0105	0.0105
YSAQMD	520-520-9282-0000	9282-COLORANT - SOLVENT BASED IM COATINGS	0.0014	0.0014	0.0014
		Total	0.3498	0.3582	0.3696

## E.2.11. Technological And Economic Feasibility

The technological and economic feasibility for the architectural contingency measure can be considered when determining the timeline for emission reductions. Coatings that comply with the 2019 SCM are already available. The cost effectiveness of the 2019 SCM was estimated by CARB to be \$1.85 per pound of VOC reduced (\$3,700 per ton) in 2019 dollars. This estimate can now be considered a conservative upper bound because manufacturers have already developed coatings for sale in South Coast Air Quality Management District and other air districts that have adopted the SCM limits.

In the draft contingency measures guidance, EPA provides additional interpretation of the Clean Air Act requirements for contingency measures that allow for emissions reductions to occur within two years from the triggering event. To meet the draft contingency measure timeline requirements and to allow coating manufacturers, distributors and retail outlets time to comply, a one-year sell-through period is being proposed, starting 60 days after the contingency measure is triggered. This compliance timeline is necessary to begin achieving emission reductions in the second year after the triggering event. In the event that the contingency measure triggers, the districts of the SFNA will conduct public outreach prior to the 60-day trigger implementing the requirements.

### E.2.12. Adoption Schedule

The contingency measures will be implemented by amending the architectural coating rules of each district. Each air district will take its amended rule to its respective air district board for adoption by the proposed adoption deadline shown in Table E-5. Once adopted, each district will submit its contingency measure to CARB and EPA for review and approval.

District	Rule	Deadline
EDAQMD	215	May 2024
FRAQMD	3.15	June 2024
PCAPCD	218	May 2024
SMAQMD	442	May 2024
YSAQMD	2.14	May 2024

 Table E-5: Contingency Measure Adoption Deadlines

## E.2.13. Conclusion

The SFNA districts are proposing commitments to amend the identified architectural coating rules as contingency measures to be submitted as part of the 2015 SFNA Ozone SIP.

#### E.2.14. References

- CARB. 2019 California Air Resources Board (CARB) Suggested Control Measure for Architectural Coatings. Sacramento, CA. May [2019]. < <u>https://ww2.arb.ca.gov/sites/default/files/2020-05/10602\_scm\_final.pdf</u> >
- ---. Staff Report for Proposed Updates to the Suggested Control Measure for Architectural Coatings. Sacramento, CA. 19 April [2019]. < <u>https://ww2.arb.ca.gov/sites/default/files/2020-06/Staff\_Report\_4-19-</u> <u>2019\_complete\_remediated.pdf</u> >
- EPA, Draft: Guidance on the Preparation of State Implementation Plan Provisions that Address the Nonattainment Area Contingency Measure Requirements for Ozone and Particulate Matter. Research Triangle Park, NC. Office of Air Quality Planning and Standards. 16 March [2023]. < <u>https://www.federalregister.gov/documents/2023/03/23/2023-06010/draft-</u> <u>guidance-on-the-preparation-of-state-implementation-plan-provisions-that-</u> <u>address-the</u> >