

# **ADVISORY NOTICE**

Rule 1113: Section (a); Section (c) Paragraph (1) and (3)(A)

Original Review: April 2008

Revised Date: July 2011

**Subject:** Clarification of the Most Restrictive Clause

#### Issue:

The South Coast Air Quality Management District has been made aware of an inquiry regarding the most restrictive clause.

## **Current Rule Language:**

Rule 1113 is "applicable to any person who supplies, sells, markets, offers for sale, or manufactures any architectural coating in the District that is intended to be field applied to stationary structures or their appurtenances, and to fields and lawns; as well as any person who applies, stores at a worksite, or solicits the application of any architectural coating within the District."

Section (c)(3)(a) specifies that "if anywhere on the container of any coating listed in either Table of Standards, on any sticker or label affixed thereto, or in any sales or advertising literature, any representation is made that the coating may be used as, or is suitable for use as, a coating for which a lower VOC standard is specified in the table or in paragraph (c)(1), then the lowest VOC standard shall apply."

## Analysis:

The purpose of Rule 1113 is to limit the VOC content of architectural coatings used in the AQMD and as such, there are specific limits that apply as shown in the Table of Standards 1.

Depending on the label or date sheets describing intended product uses, some uses may fall under more than one category.

#### **Conclusion:**

Depending on how the product is labeled or marketed for multiple uses, that product must comply with the most restrictive applicable VOC limit.

Comments or questions regarding Rule 1113 should be directed to <a href="mailto:areasources@aqmd.gov">areasources@aqmd.gov</a> or call the Area Source team at 909-396-2390.