

June 30, 2020

Mr. Tung Le
Executive Director
California Air Pollution Control Officers Association
1107 Ninth Street, Suite 801
Sacramento, California 95814

Dear Mr. Le:

On May 28, 2020, the California Air Resources Board (CARB or Board) approved updates to the 2019 Suggested Control Measure for Architectural Coatings (SCM). CARB staff developed the updated SCM, in consultation with the air districts and United States Environmental Protection Agency (U.S. EPA), to add a new Photovoltaic Coatings category intended for use on solar modules. The updated SCM adds a new category for Photovoltaic Coatings and establishes a volatile organic compound limit of 600 grams per liter for the category. Solar modules coated with photovoltaic coatings produce more electricity and thus result in potential avoided criteria, toxics, and greenhouse emissions from power plants. An equivalent of 113 MW of electricity capacity would be gained if all identified uncoated modules in California are coated with photovoltaic coatings.

The updated SCM is intended for air districts that have existing solar installations and who may be interested in using the SCM as a template for district rules. To maintain uniformity of architectural coatings regulation throughout California, CARB strongly encourages air districts to consider adopting the updated SCM without modification. It is important that the SCM be modified only as necessary for consistency for the format of the district's rules and that the definitions, standards, and effective dates be uniform. CARB staff is ready to assist air districts with the adoption, interpretation, or implementation of the updated SCM.

Along with the enclosed updated SCM, CARB staff prepared a Staff Report, which contains technical assessments for the proposed coating category, an environmental analysis, and an economic impact assessment. This document is available on our website at <https://ww2.arb.ca.gov/our-work/programs/coatings/architectural-coatings/suggested-control-measure>. To request hard copies, please contact Mr. Jose Gomez, Manager, Technical Development Section at jose.gomez@arb.ca.gov.

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If you have any questions, please contact Mr. Kurt Karperos, Deputy Executive Officer, at kurt.karperos@arb.ca.gov or contact Dr. Michael Benjamin, Chief, Air Quality Planning and Science Division, at michael.benjamin@arb.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'R. W. Corey', with a stylized flourish at the end.

Richard W. Corey
Executive Officer

Enclosure

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