US Army Corps of Engineers

ENGINEERING AND CONSTRUCTION BULLETIN

No. 2026-5 **Issuing Office:** CEEC **Issued:** 09 Feb 2026 **Expires:** 09 Feb 2028

SUBJECT: Temporary Guidance for Use of SSPC Paint 16, Coal Tar Epoxy (C-200a) with Extended Cure Time

CATEGORY: For Implementation and Information

1. **References**:

a. SSPC Paint 16, Coal Tar Epoxy-Polyamide Black (or Dark Red) Paint

2. **Purpose.**

This Engineering and Construction Bulletin (ECB) provides temporary guidance and authorization for the use of specific, recently manufactured batches of coal tar epoxy (C-200a) that do not meet the standard 5-day cure requirements of Society of Protective Coatings, formerly Steel Structures Painting Council (SSPC), Paint 16. This bulletin is issued to prevent schedule delays on critical U.S. Army Corps of Engineers (USACE) Civil Works projects due to a widespread raw material issue affecting all manufacturers of this coating.

3. **Applicability.**

This ECB applies to all USACE Civil Works projects specifying Coating System 6 or 6-A-Z, which requires the use of coal tar epoxy (C-200a).

4. **Background.**

Per unified facilities guide specification (UFGS) 09 97 02, the USACE Paint Technology Center (PTC), Technical Center of Expertise (TCX) at Engineer Research and Development Center – Construction Engineering Research Laboratory (ERDC-CERL) manages a quality assurance program that tests each batch of paint and solvent prior to use. Since April 2025, widespread failures have been observed in C-200a coatings from multiple manufacturers when tested to SSPC Paint 16 requirements.

The root cause of these failures has been traced to a quality issue with a primary raw ingredient, coal tar pitch, from a major U.S. supplier. This has resulted in a market-wide problem where the coating, while correctly formulated, is softer than specified and fails the mandatory adhesion and penetration tests after the standard 5-day cure period. Laboratory testing confirms that while these batches fail at 5 days, full compliance with SSPC Paint 16 performance requirements is achieved after an extended cure time of 15 days at 77°F and 50% relative humidity. After this period, the coating performs as expected.

5. **Implementation.**

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Subject Temporary Guidance for Use of SSPC Paint 16, Coal Tar Epoxy (C-200a) with Extended Cure Time

Effective immediately, the batches of C-200a that are tested by CERL and fail, are authorized for use on USACE projects provided the following requirements are observed:

a. *Mandatory extended cure.* These coatings require a minimum of 15 days at 77°F (25°C) and 50% relative humidity to achieve the required hardness and adhesion for service. Cure times will vary based on environmental conditions. Refer to Figures 1 and 2 for guidance on minimum cure times at different temperatures.

(1) *Critical warning.* These coatings WILL NOT perform as expected if submerged or placed into service before the full 15-day cure (at 77°F) is complete. Failure to adhere to this extended cure time will result in the coating remaining too soft, leading to premature failure.

b. *Reporting.* Contractors must continue to submit paint and solvent testing reports as indicated by UFGS 09 97 02. The official reports for the affected batches will be amended with a note referring to this ECB for guidance on the extended cure requirements. Failing reports without this note included should not be considered for use.

c. *Figures.* The following figures provide general guidance on cure times. These apply to all manufacturers' C-200a products affected by the raw material issue.

(1) **Figure 1: Minimum Dry to Service Time**. This chart shows the number of days required for the coating to be fully cured and ready for immersion or service, based on the ambient temperature. At 77°F, this is 15 days. At lower temperatures, the time required is significantly longer.

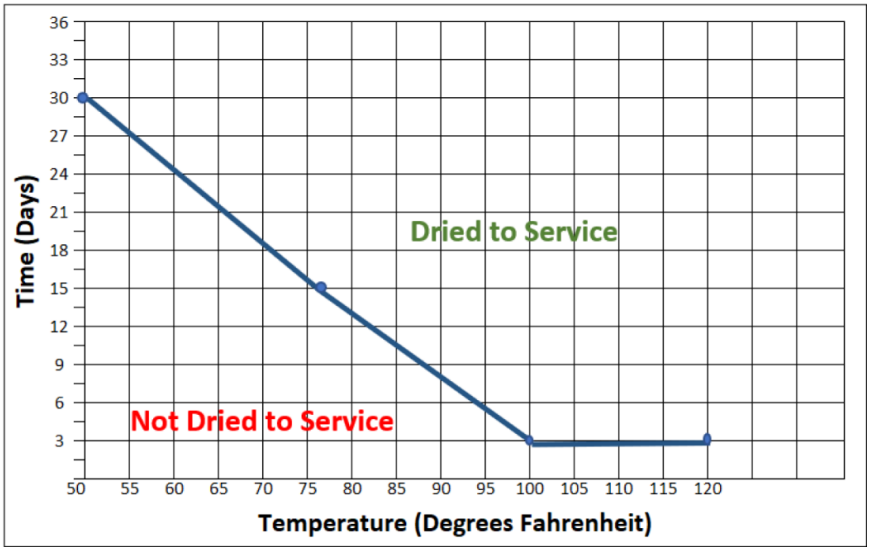

Figure 1: Minimum Dry to Service Time

(2) **Figure 2: Minimum Dry to Handle Time**. This chart shows the time required before the coating is sufficiently tack-free to be handled. This is not the "Dry to Service" time.

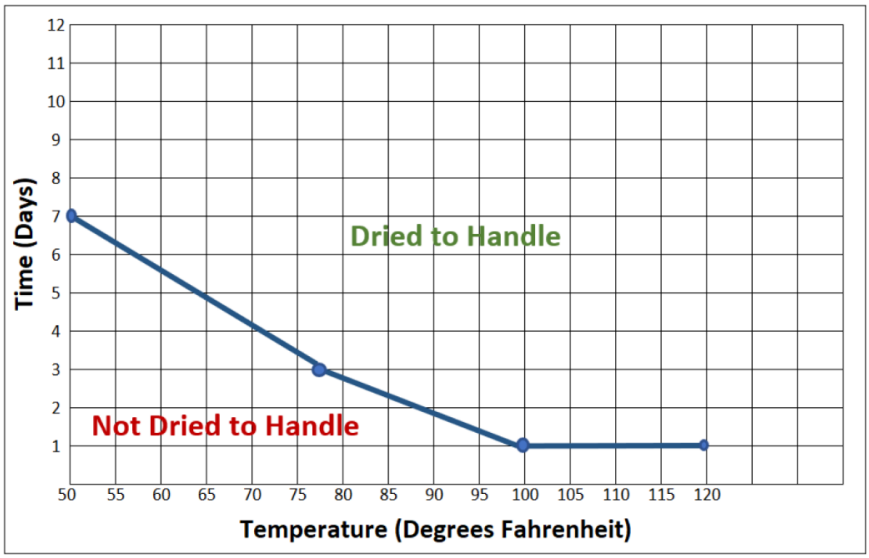

Figure 2: Minimum Dry to Handle time

d. CERL will include the following note on submitted testing reports where the product has failed to indicate the extended cure period is applicable:

> *"The initial rejection of this sample is superseded by Engineering and Construction Bulletin (ECB) No. 2026-5. While the material failed standard 5-day cure testing due to a now-known raw material issue, laboratory testing confirms that full compliance with all performance requirements is achieved after an extended cure period.*
>
> *Mandatory Requirement: This coating requires a minimum cure time of 15 days at 77°F and 50% relative humidity before being placed into service. Placing the coating into service before this extended cure is complete will result in premature failure. Please refer to ECB No. 2026-5 for complete guidance and cure time adjustments based on different temperatures."*

6. **Date of Applicability.** This ECB is effective immediately.

7. **Update.** No additional policy updates are necessary because of these new requirements. Upon expiration of this ECB, UFGS 09 97 02 will reflect current guidance.

8. **Point of Contact.** HQUSACE point of contact for this ECB is Ms. Mary A. Billings, USACE Chief Structural Engineer, CEEC, (540) 665-2686. ERDC-CERL-PTC point of contact for this ECB is Ms. Brooke A. Divan, Director of Field Relations.

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