

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

**ATTENTION: MOBILE MOTOR VEHICLE REFINISHING AND COATING OPERATORS**

**SUBJECT: RULE STANDARDS FOR MOBILE MOTOR VEHICLE COATING OPERATIONS (REGULATION 8, RULE 45)**

On December 3, 2008 the Bay Area Air Quality management District (Air District) amended Regulation 8, Rule 45. Changes in the rule now include annual registration and additional recordkeeping requirements for mobile coating operations. The amendments further reduce Volatile Organic Compound (VOC) emissions from automotive refinishing by incorporating the VOC limits and operational standards. The following changes to Reg. 8-45 become effective on October 1, 2009:

**Mobile Refinishers:** New administrative requirements have been established for mobile refinishing operations. Mobile Refinishers (a.k.a. Mobile Coaters) are defined as any person that paints automobiles with a spray gun in areas that are not equipped with permanent paint filtration areas (e.g., paint booth or filter station). This does not include paint from aerosol cans or applied with a paint brush. All other standards set by Regulation 8, Rule 45, including but not limited to, coating VOC limits, filtration (e.g., box fan with an attached filter) and transfer efficiency requirements are still applicable to mobile refinishers.

- **Mandatory registration:** no later than *October 1, 2009*. Any person engaging in mobile refinishing operations shall register with the Air District as well as pay registration fees. *More specific instructions for registration will be sent closer to the registration deadline.* (Reg. 8-45-402)
- Effective October 1, 2009, **upon request**, any mobile refinishing operator shall supply the APCO with a list of scheduled clients including name, address and anticipated schedule. (Reg. 8-45-403)
- Mobile coating operators must use a properly maintained particulate filtration media when applying clear coating, color coating, multi-color coating, single-stage coating or uniform finish coating to any vehicle.

**New VOC Limits:** Several VOC limits for coatings and solvents will be lowered on the effective date listed in the table below.

Product	New VOC limits	Effective date
Color Coatings (waterborne)	420 g/l (3.5 lbs/gal)	October 1, 2009
Specialty Coatings	250 g/l (2.1 lbs/gal) – 680 g/l (5.7 lbs/gal)	October 1, 2009
Underbody Coating	430 g/l (3.6 lbs/gal)	October 1, 2009
Uniform finishing Coating	540 g/l (4.5 lbs/gal)	October 1, 2009
Truck Bed Liner Coating	301 g/l (2.6 lb/gal)	October 1, 2009
Surface Preparation Solvent	25 g/l (0.20 lbs/gal)	October 1, 2009
Bug and Tar Removal Solvent	350 g/l (2.9 lbs/gal)	October 1, 2009
Adhesion Promoter	540 g/l (4.5 lbs/gal)	January 1, 2010
Primer Sealer	250 g/l (2.1 lbs/gal)	January 1, 2010
Single-Stage Coating	340 g/l (2.8 lbs/gal)	January 1, 2010

Please contact Distributer (Jobbers) regarding new waterborne coating requirements and usage techniques.

**Additional Changes**, Starting October 1, 2009:

- There will no longer be separate VOC limits for passenger cars, large/heavy duty truck cabs and chassis, trucks, vans, motorcycles, public transit buses and mobile equipment. (Reg 8-45 section 301.3)
- Consider final VOC content for color coats and clear coats separately. Composite VOC limits for multistage coating operations. (Reg. 8-45-225).
- Primers, Primer Surfacer and Precoats will all be considered Primers. The VOC limits will remain 250 g/l.
- All specialty coating will meet the 250 g/l VOC limit except Multi-Color coating, Truck Bed Liner Coating, Underbody coating, Uniform Finish coating and Adhesion Promoter (VOC listed on the table, page 1).
- The volume of adhesion promoter, uniform finish coating and multi-color coating combined shall not exceed 5.0% of all topcoats applied on a monthly basis. Make sure it is clearly recorded in the usage logs. (Reg. 8-45-312)
- New usage limits for surface preparation solvent used exclusively as bug and tar removal (VOC content 350 g/l) is limited as follows (Reg. 8-45-308.5):
  - a. 20 gallons in any consecutive 12-month period for facilities and operations with 400 gallons or more of coating usage per year;
  - b. 15 gallons in any consecutive 12-month period for facilities and operations with 150 gallons or more of coating usage per year or
  - c. 10 gallons in any consecutive 12-month period for facilities and operations with less than 150 gallons of coating usage per year;
- All other Surface Preparation Solvent must meet a 25 g/l limit.
- Certain VOC limits and other requirements remain in effect and have not been revised; refer to Regulation 8, Rule 45 for all provisions, see [www.baaqmd.gov/dts/regulations/rg0845.pdf](http://www.baaqmd.gov/dts/regulations/rg0845.pdf)

**More Information can be obtained from the following sources:**

-  For questions about this Advisory, contact Magen Harris, Air Quality Specialist, at [mharris@baaqmd.gov](mailto:mharris@baaqmd.gov) or (415) 749-4785.
-  For a copy of the above-listed rule, see [www.baaqmd.gov/dst/regulations/rg0845.pdf](http://www.baaqmd.gov/dst/regulations/rg0845.pdf)
-  For compliance assistance, call (415) 749-4999, the Compliance Counselor Hotline.
-  For permit or registration assistance call Duncan Campbell, AQ Technician, at [dcampbell@baaqmd.gov](mailto:dcampbell@baaqmd.gov) or (415) 749-4722.

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