

Compliance and Enforcement Division April 8, 2009 Compliance Advisory

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: MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OWNER AND OPERATORS

SUBJECT: RULE STANDARDS FOR AUTOMOBILE AND MOBILE EQUIPMENT COATING OPERATIONS (REGULATION 8, RULE 45)

On December 3, 2008 the Bay Area Air Quality management District (Air District) amended Regulation 8, Rule 45. 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:

New VOC Limits: Several VOC limits for coatings and solvents will be lowered on the effective date listed in the table below. <u>Contact Distributor (Jobbers) regarding new waterborne coating requirements and usage techniques.</u>

Product	New VOC limits	Effective date
Surface preparation solvent (waterborne)	25 g/l (0.20 lbs/gal)	October 1, 2009
Bug and tar removal solvent (waterborne)	350 g/l (2.9 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 (waterborne)	301 g/l (2.6 lb/gal)	October 1, 2009
Adhesion Promoter	540 g/l (4.5 lbs/gal)	January 1, 2010
Primer Sealer (waterborne)	250 g/l (2.1 lbs/gal)	January 1, 2010
Single-Stage Coating (waterborne)	340 g/l (2.8 lbs/gal)	January 1, 2010

Mobile Refinishers: New administrative requirements have been established for mobile coating operations. Mobile Refinishers (a.k.a. Mobile Coaters) are defined as any person that paints automotives 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.

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- Mandatory registration: no later then 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 <u>list of scheduled clients</u> 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.

Miscellaneous Changes:

- Combine Groups I and II. No longer separate VOC requirements. (Reg 8-45 section 301.3)
- Eliminate composite VOC limits for multistage coating operations. Consider final VOC content for color coats and clear coats separately (Reg. 8-45-225).
- Combine primer and primer surfacer categories
- Eliminate general precoat and specialty coating category. New categories previously considered specialty coatings will have specific categories and VOC limits (see 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;
- 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

More Information can be obtained from the following sources:

- For questions about this Advisory, contact Magen Harris, Air Quality Specialist, at mharris@baaqmd.gov or (415) 749-4785.
- For a copy of the above-listed rule, see www.baaqmd.gov/dst/regulations/rg0845.pdf
- For compliance assistance, call (415) 749-4999, the Compliance Counselor Hotline.
- For permit or registration assistance call (415) 749-4990, Engineering Services.

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