

August 25-27, 2008



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

**Public Workshop:
Amendments to Regulation 8,
Rule 45, Motor Vehicle and
Mobile Equipment Coating
Operations**

**Victor Douglas
Principal Air Quality Specialist**

Overview

- Background
- Regulatory Review
- Regulatory Proposal
- Emissions Inventory
- Compliance Costs
- Next Steps

Background

VOC Sources from Auto Refinishing Operations

- Coatings
 - Surface Preparation
 - Primers
 - Topcoats
 - Other Coatings
- Solvents
- Spray Equipment Use / Cleaning

Regulatory Review

The Current Rule

- Adopted in 1989
- Amended: 1994, 1999
- Applies to:
 - auto body shops, mobile refinishers
 - mfr / sellers of auto refinishing coatings
 - mfr of heavy equipment (passenger buses, HD trucks)

Regulatory Review

Coating Categories & Solvent	VOC Limits [g/l & (lb/gal)]	
	Group I	Group II
Pretreatment Wash Primer	780 (6.5)	780 (6.5)
Precoat	580 (4.8)	580 (4.8)
Primer / Primer Surfacer	250 (2.1)	250 (2.1)
Primer Sealer	420 (3.5)	340 (2.8)
Solid Color Topcoat	420 (3.5)	--
Topcoat	--	420 (3.5)

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Regulatory Review

Coating Categories & Solvent	VOC Limits [g/l & (lb/gal)]	
	Group I	Group II
Metallic / Iridescent Topcoat	520 (4.3)	420 (3.5)
Multi-Stage Topcoat System	540 (4.5)	--
Camouflage	--	420 (3.5)
Specialty Coatings	840 (7.0)	840 (7.0)
Temporary Protective Coating	60 (0.5)	60 (0.5)
Surface Prep Solvent	72 (0.6)	72 (0.6)
Plastic Surface Prep Solvent	780 (6.5)	780 (6.5)

Regulatory Review

Other Requirements

- Transfer Efficiency:
 - Electrostatic application equipment,
 - HVLP spray equipment, or
 - Equivalent
- Operation and Maintenance
- Proper Filtration
- Recordkeeping

Regulatory Review

2005 Automotive Coatings SCM

- Combine Groups I & II
- Eliminate composite VOC limits for multistage coating systems
- Combine primer, primer surfacer, and primer sealer categories
- Eliminate general specialty coating category

Proposed Regulatory Changes

- Incorporate VOC limits and operational standards from the SCM
- Include optional reactivity limits
- Additional requirements for mobile refinishers and clients

Proposed VOC Limits

Coating Categories	VOC Limits [(g/l (lbs/gal))]	Effective Dates
Clear Coating	250 (2.1)	<p style="text-align: center;"> Manufacturers July 1, 2009 & Auto Body Facilities January 1, 2010 </p>
Color Coating	420 (3.5)	
Multi-Color Coating	680 (5.7)	
Pretreatment Coating	660 (5.5)	
Temporary Protective Coating	60 (0.5)	
Truck Bed Liner Coating	310 (2.6)	
Underbody Coating	430 (3.6)	
Uniform Finish Coating	540 (4.5)	
Any Other Coating Type	250 (2.1)	
All Solvents	25 (0.2)	

Proposed VOC Limits & Standards

Coating Categories	VOC Limits [(g/l (lbs/gal))]	Effective Dates
Adhesion Promoter	540 (4.5)	Mfrs: July 1, 2009 & Facilities: January 1, 2010
Primer	250 (2.1)	
Single-Stage Coating	340 (2.8)	

- VOC Labeling Requirements
- Compliance Statement
- Recordkeeping Requirements

Reactivity

- Measure of a compound's potential to form ozone (smog)
- More direct indication of air quality impacts
- May offer greater flexibility in product formulation
- No exempt compounds
- Used in ARB aerosol coating regulation

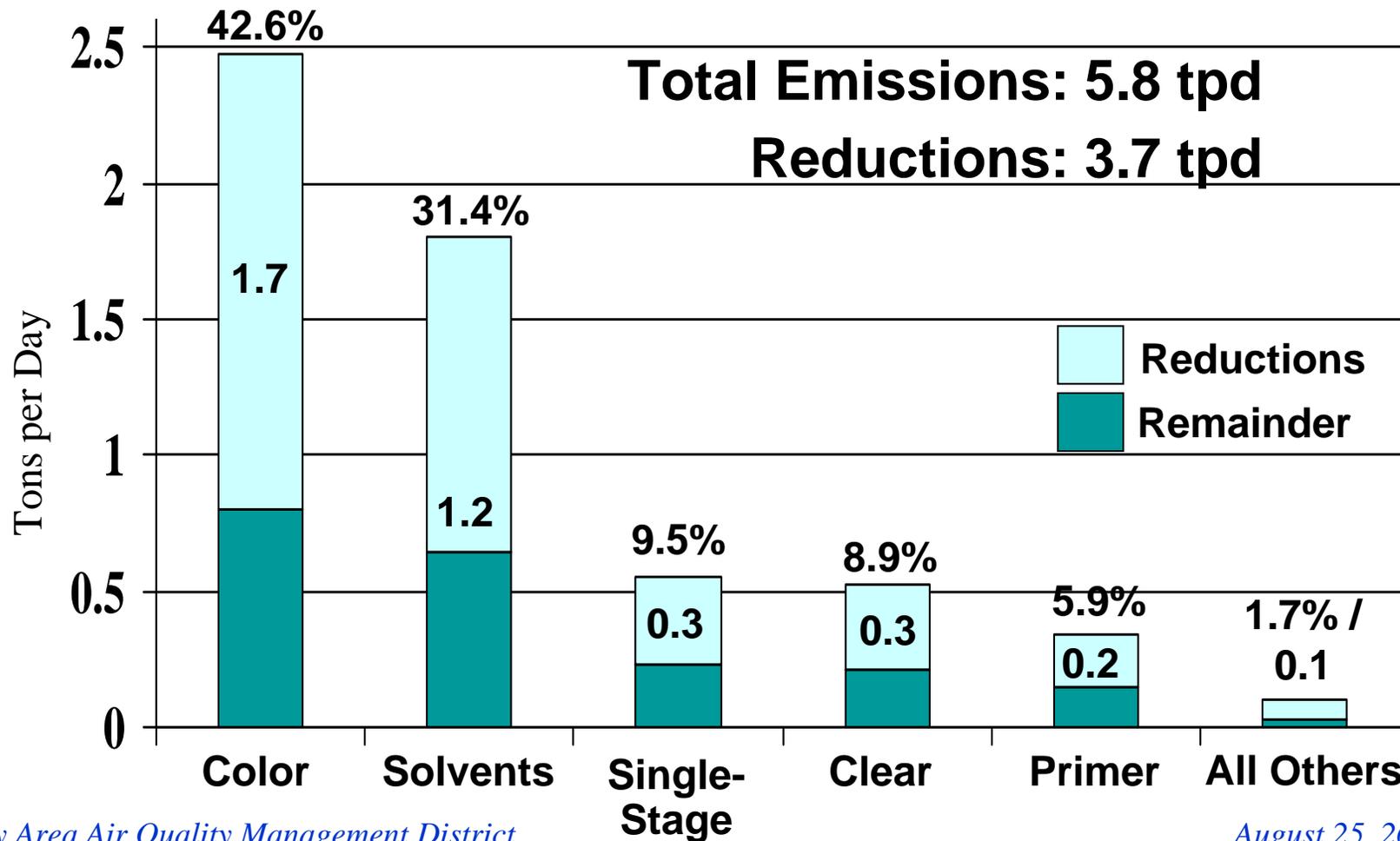
Optional Reactivity Limits

Coating Categories	Reactivity Limits		Effective Date
	$\frac{\text{g ozone}}{\text{g coating}}$	% reactivity reduction	
Adhesion Promoter	0.60	78	Manufacturers June 2009 & Auto Body Facilities January 1, 2010
Clear Coating	0.60	60	
Color Coating	0.35	68	
Multi-Color Coating	0	0	
Pretreatment Coating	1.80	59	
Primer	0.60	58	
Primer Sealer	0.25	40	
Single-Stage Coating	0.35	43	

Mobile Refinishing Requirements

- Registration
- Notification
- Properly operated filtration
- Recordkeeping
 - Mobile Refinishers
 - Clients

2005 Emissions Inventory



Compliance Costs

- Drying Equipment:
 - Range: \$1650 to \$12,500
 - Average: \$2320
- Coatings: up to 20% increase
 - Costs offset by more solids and less waste.
- Mobile Refinisher Registration:
 - Initial fee: \$100
 - Annual fee: \$60

Next Steps

- Comments due September 5, 2008
- Gather additional information
- Draft final Proposal
- Board Hearing: November 2008

Contact Information

Please send comments by **September 5** to:

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