

### COMPLIANCE ASSISTANCE ADVISORY

# RULE 74.18 MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATIONS

## IMPORTANCE NOTICE FOR AUTOBODY COATERS

On November 11, 2008, the Ventura County Air Pollution Control Board adopted revisions to Rule 74.18, Motor Vehicle and Mobile Equipment Coating Operations. The revised rule includes significant revisions to the Rule that may affect your business' operation. **Most of the revisions to Rule 74.18 become effective on January 1, 2009.** 

Ventura County does not meet the federal or state air quality standards for ozone; the revisions to Rule 74.18 will help the County meet those standards by reducing the amount of reactive organic compounds (ROC) emissions from autobody coating operations. The following is a summary of the significant changes made to Rule 74.18:

#### Effective January 1, 2009

- The most significant change is a new low-ROC limit for color coats commonly used in basecoat/clearcoat applications. The color coat (or basecoat) ROC limit is 420 grams of ROC per liter of coating. This change requires the use of water-based color coats; new spray booth air movement equipment and water-based spray gun cleaners. Many autobody shops in Ventura County have already switched to the new water-based technology. Color coats manufactured prior to January 1, 2009, and which have an ROC content greater than 420 grams per liter but less than 760 grams per liter, may be used until July 1, 2009.
- Recordkeeping requirements have been reduced and simplified. Monthly records of coatings and solvents purchased are now required. Daily records are no longer required.
- The specialty coating category has been eliminated. In its place, individual coating categories now apply, with a default coating category of 250 grams of ROC per liter.
- It will be a violation to possess coatings that do not comply with the Rule.
- The multistage topcoat category has been eliminated; it has been replaced by separate clear coat and color coat limits. Averaging ROC limits for basecoat/clearcoat will no longer be required.

### Effective January 1, 2010

Solvent cleaners (including surface preparation and spray gun cleaning) shall not exceed 25 grams of ROC per liter of material. The rule allows a limited use exemption (up to 130 pounds of ROC per year per shop) for surface preparation cleaners that exceed 25 grams of ROC per liter of material. To obtain an exemption, a Compliance Plan must be submitted and approved by the APCD. Section C.12 of the Rule describes the information that must be in the Compliance Plan.

Noncompliant surface preparation cleaners cannot be used if they are not included in a Compliance Plan. Until January 1, 2010, solvents used for substrate surface preparation prior to coating cannot exceed 200 grams of ROC per liter of coating. Compliance Plans should be submitted to the following address:

Ventura County APCD Attention: Compliance Division 669 County Square Drive, 2<sup>nd</sup> Floor Ventura, CA 93003

- New ROC limits will apply to single stage topcoats and primer sealers.
- It will be a violation to possess solvents (excluding paint strippers or paint removers used for removing cured coatings) that do not comply with the Rule.

For a copy of the revised rule, see the Rule Development page on the District web site at www.vcapcd.org/rules\_division.htm or contact Stan Cowen at 805/645-1408.

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