



---

**RULE 74.18  
LOW USAGE EXEMPT SURFACE  
PREPARATION CLEANER COMPLIANCE PLAN**

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 a number of changes that are effective January 1, 2010.

One of those changes affects surface cleaning and equipment cleaning operations. Solvent cleaners (including surface preparation and spray gun cleaning) shall not exceed 25 grams of ROC<sup>1</sup> per liter of material. However, 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. There is no exemption for solvent used for spray gun and equipment cleaning.

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. Surface preparation cleaners that exceed 25 g/l of ROC cannot be used unless they are included in an approved Compliance Plan.

Compliance Plans should be submitted to the following address:

Dan Searcy  
Ventura County APCD  
669 County Square Drive, 2<sup>nd</sup> Floor  
Ventura, CA 93003

The Compliance Plan must contain the following information or it will not be approved:

- List of all exempt cleaners
- Description of label or sticker to be placed on each container, designating it as a low-use exempt cleaner.
- MSDS or Product Data Sheet for each cleaner showing VOC information. (Grams of VOC per liter of material)
- Name of the vendor for each surface preparation cleaner

Once you have submitted a Compliance Plan and it is approved, you may use up to 130 pounds of ROC per calendar year per shop. You may not use noncompliant materials unless your compliance plan has been approved and not before January 1, 2010.

---

<sup>1</sup> Reactive organic Compounds (ROC) and Volatile Organic Compounds (VOC) have the same meaning.

Also, you must meet the following requirements:

- Total usage of exempt surface preparation cleaners is limited to less than 130 pounds of ROC per calendar year per shop<sup>2</sup>.
- The VOC content of non-aerosol cleaners shall not exceed 6.51 pounds of VOC per gallon.

For the complete requirements and limitations, please refer to Ventura County APCD Rule 74.18. You may download a copy of Rule 74.18 at [www.vcapcd.org](http://www.vcapcd.org).

A blank Compliance Plan form and instructions may be obtained from the “Downloads” section of the District’s web site at [www.vcapcd.org](http://www.vcapcd.org).

If you have any questions regarding APCD Rule 74.18, or need additional information, contact Dan Searcy at 805/645-1494 or email at [dans@vcapcd.org](mailto:dans@vcapcd.org).

---

<sup>2</sup> Total usage of exempt surface preparation cleaners will be determined by monthly purchase records with no emission credit for any waste solvent generation (Section C12.b).