

COMPLIANCE ASSISTANCE ADVISORY

WOOD PRODUCTS COATING: HOW TO AVOID COSTLY VIOLATIONS

On May 17, 1994, the Ventura County Air Pollution Control Board adopted District Rule 74.30, Wood Products Coatings. Since the adoption of Rule 74.12, District Compliance personnel have issued numerous Notices of Violations (NOVs) to regulated facilities for a variety of violations.

The purpose of this advisory is to help wood coaters stay in compliance with Rule 74.30, and to help them avoid future violations and costly penalties. Below is a list of the most common Rule 74.30 violations observed by District Inspectors and how to avoid them:

Coating ROC Content Too High. Be sure to be familiarize yourself with the reactive organic compound (ROC) limits for *your* specific coating categories. Make sure that your painters mix all coatings according to the manufacturer's instructions. Suppliers and manufacturers can supply you with ROC information for all coatings they sell.

Additionally, you should be aware that Rule 74.30 contains different coating limits depending on what items you are coating. *The limits for coating new wood products are very different from the limits for refinishing wood products.*

Transfer Efficiency. Rule 74.30 requires that wood products coaters meet strict transfer efficiency requirements when spray painting. Most refinishers use HVLP spray guns to meet those requirements. A properly operated HVLP spray gun must be operated with no more than 10 PSI air pressure at the air cap. Most manufacturers specify a maximum air pressure setting at the spray gun air inlet in order to comply with the 10 PSI air cap pressure limit. The maximum inlet air pressure is either stamped on the spray gun body, near the air inlet, or it can be found in the manufacturer's instruction manual.

Surface Prep Solvent. Rule 74.30, limits the ROC content of surface prep solvents to no more than 25 grams per liter (g/l). This limit also includes aerosol cans and "wipes". Surface prep means the use of ROC containing solvents for removing dirt, dust, grease, and other contaminants from a surface before you paint, prime, or stain it. Be sure to inform your supplier that you are ordering products for surface prep use *in Ventura County*. Other areas in California may have different requirements than Ventura County.

A copy of APCD Rule 74.30 may be obtained from the District's web site at www.vcapcd.org.

If you have any questions regarding APCD Rule 74.30, or need additional information, contact Dan Searcy at 805/645-1494 or by email at dans@vcapcd.org.

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