

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT

669 County Square Drive, Ventura CA 93003 805/645-1401 FAX 805/645-1444 www.vcapcd.org

MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATIONS

Please review District Rule 74.18 – Motor Vehicle and Mobile Equipment Coating Operations. Note that new, modified, or relocated facilities will also be subject to Rule 26, "New Source Review", including provisions for BACT (Best Available Control Technology). Compliance with all applicable rules must be demonstrated. For information on applicability of a rule, please refer to the actual rule. Contact the District if you have any questions.

Spray Booth Information	 			
Spray Booth Manufacturer				
Spray Booth Model				
Spray Booth Dimensions				
(indicate units-feet, meters, etc.)	 Wide		Long	High
Spray Booth Type	Bench	Fan Sp	peed	
	Floor	(cubic	feet per minute)	
	Automotive			cfm
Coating is performed with:	Booth completely clo			
(Check one)	One end of Booth ope	ened		
Particulate Control Equipment	Filter		Scrubber	
(Check all that apply)	Water Wall		Other	
Prep Station Information				
Will any prep stations be used?	Yes	□ No	0	
Is each prep station equipped to provide airflow through exhaust filters?	Yes	□ No	0	
If yes, Prep Station Manufacturer and Model				
Information on Operations				
Coating Application Method	Conventional Air Ato	mized	☐ High Volume I	Low Pressure
(Check all that apply)	Electrostatic		Other	
Drying Method	Air Dry		☐ Heated Air Uni	it
(Check all that apply)			Fuel	
Maximum Heat Input Rating of Heated	_		☐ Million BTU	s Per Hour
Air Unit – For Natural Gas Fired			Other	
Units Only (Specify Units)				

SURFACE COATINGS AND OTHER MATERIALS. Use page 3 to report solvents used in cleaning operations

Use one line to report each material. Use additional forms to report more than 8 materials.

Material (e.g., Coating) Brand & Product Name or	Reducer or Thinner Brand & Product Name or Code	Hardener or Catalyst Brand & Product Name or Code	Mix Ratio ¹		Ratio ¹		VOC Content as Mixed, As Computed Less Water & Less	Category ² (e.g., primer, color coating)	Proposed Maximum Annual
Code			M	R	Н	W	Exempt solvents (Grams per Liter/Minus, Minus)		Usage (Gal/Year)
							(Citatis per Liter/ivinites, ivinites)		(Gai/Tear)

^{1 –} M - Material R – Reducer or Thinner H – Hardener or Catalyst W – Water

To convert from pounds per gallon to grams per liter, multiply by 120.

NOTE: YOU ALSO NEED TO SUPPLY MANUFACTURER'S SUPPORTING VOC DOCUMENTATION FOR EACH COATING AND OTHER MATERIAL, AS MIXED, AND AS COMPUTED LESS WATER AND EXEMPT ORGANIC COMPOUNDS.

^{2 -} This column needs to be completed to determine the corresponding VOC limit. Refer to the table in Subsection B.1 of Rule 74.18.

SOLVENTS USED IN CLEANING OPERATIONS. Use page 2 to report surface coatings and other materials Use one line to report each material. Use additional forms to report more than 7 materials.

	Material (e.g., solvent) Brand & Product Name or Code	Additional Component Brand & Product Name or Code	Mi M	x Rat	tio ¹	VOC Content as Mixed (Grams per Liter)	Proposed Maximum Annual Usage (Gal/Year)

1 – M - Material AC – Additional Component W – Water

To convert from pounds per gallon to grams per liter, multiply by 120.

NOTE: YOU ALSO NEED TO SUPPLY MANUFACTURER'S SUPPORTING VOC DOCUMENTATION FOR EACH COMPONENT.

SURFACE COATINGS AND OTHER MATERIALS. Use page 3 to report solvents used in cleaning operations

Use one line to report each material. Use additional forms to report more than 8 materials.

Material	Reducer or Thinner	Hardener or Catalyst	M	lix F	Rati	o^1	VOC Content as	Category ²	Proposed
(e.g., Coating)	Brand & Product Name or	Brand & Product Name or				Mixed, As Computed	(e.g., primer, color	Maximum	
Brand & Product Name or	Code	Code					Less Water & Less	coating)	Annual
Code			3.6	ъ		***	Exempt solvents		Usage
	, -		M	R	Н	W	(Lbs/gal/Minus,Minus)		(Gal/Year)
Acme Undercoat 100	Acme XY30	Acme 4500	2	1	1	-	3.4	Underbody coating	50
Acme Clearcoat 100	Асте АВ45	Acme 6000	4	1	2	-	2.1	Clear coating	50
								coating	
Acme 2100 Prime-It	Acme AB21	_	2	_	1	_	2.1	Primer	25
J 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5	y == 11								
	4 001000	4000		1/	1/		2.0		2.0
Acme EZ Topcoat	Acme CD1000	Acme 1000	3	1/2	1/2	-	2.8	Color coating	30
								0	
	$C \wedge$	NAD							
	D/						1		

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SOLVENTS USED IN CLEANING OPERATIONS. Use page 2 to report surface coatings and other materials Use one line to report each material. Use additional forms to report more than 7 materials.

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Material	Additional Component	Mix Ratio ¹ VOC Content		VOC Content	Proposed	
(e.g., solvent)	Brand & Product Name or Code				as Mixed	Maximum
Brand & Product Name or Code					(Grams per Liter)	Annual
		M	AC	W		Usage
ACOUT O All		,	АС	_	25	(Gal/Year)
ACME Prep-All	_	1	-	3	25	30
Acme Gun Cleaner 457	_	1	-	-	25	100
		,				

1 – M - Material AC – Additional Component W – Water

To convert from pounds per gallon to grams per liter, multiply by 120.

NOTE: YOU ALSO NEED TO SUPPLY MANUFACTURER'S SUPPORTING VOC DOCUMENTATION FOR EACH COMPONENT.



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INSTRUCTIONS FOR AUTOCOATINGFORM004 MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATIONS

APCD Rule 74.18 applies to anyone who supplies, sells or uses coatings which are applied on vehicles or mobile equipment. This includes any part of a vehicle or mobile equipment, whether or not it is attached. Operations using exclusively hand-held, nonrefillable aerosol coating cans with a maximum net weight of 16 ounces are exempt from Rule 74.18.

A motor vehicle is defined in Rule 74.18 as a vehicle which is self-propelled, including, but not limited to cars, trucks, buses, golf carts, vans, motorcycles, tanks, or armored personnel carriers.

Mobile equipment is any equipment which may be drawn or is capable of being driven on rails or a roadway, including, but not limited to, trains, railcars, truck bodies, truck trailers, camper shells, mobile cranes, forklifts, bulldozers, tractors, concrete mixers, street cleaners, golf carts, all terrain vehicles, implements of husbandry, and hauling equipment used inside and around airports, docks, depots, and industrial and commercial plants, utility bodies, or implements of husbandry or agriculture.

The following information will need to be supplied in order for the APCD to evaluate compliance with APCD Rule 74.18:

<u>Paint Spray Booths</u> - APCD Rule 74.18 requires that coatings be applied in a properly operated and maintained paint spray booth or prep station. **This includes primers.**

There are a few specific exceptions to this requirement. Please refer to Rule 74.18.C.5, C.6, and C.7 for details on these exceptions. If a spray booth or prep station is not being proposed for all coating application, additional information will need to be supplied which details how an exception applies.

If you are proposing the use of any spray booth(s), please complete the Spray Booth Information Section of Form AutoCoating004.

<u>Prep Stations</u> - A prep station is defined as any spraying area that meets the requirements for a "limited spraying area" from Section 45.207 of the Uniform Fire Code and that prevents the escape to the atmosphere of overspray particulate using properly maintained filters and positive mechanical ventilation. The aggregate surface area to be sprayed cannot exceed 9 square feet, based on the Uniform Fire Code.

If you are proposing the use of any prep station(s), please complete the Prep Station Information Section of Form AutoCoating004.

Spray Equipment - Rule 74.18 requires that spray application of coatings be performed with high

<u>INSTRUCTIONS FOR AUTOCOATING004</u> MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATIONS

volume low pressure (HVLP) spray guns, electrostatic spray guns, or any other equipment which has been demonstrated to achieve a transfer efficiency equivalent to these methods. Conventional air atomized spray guns will not meet this requirement.

Indicate the type of spray equipment that you will be using in the Information on Operations section of Form AutoCoating004.

<u>Cleaning Operations</u> - Effective January 1, 2010, cleaning must be performed with solvents that have an ROC content that does not exceed 25 grams per liter of material. Cleaning Operations are defined as the removal of uncured adhesives, inks or coatings, or contaminants, including but not limited to, dirt, soil, or grease, from motor vehicles, mobile equipment, associated parts and components, parts, products, tools, machinery, equipment, or general work areas. Cleaning operations include, but are not limited to, substrate surface preparation and spray gun cleaning and exclude janitorial cleaning.

VOC Limits On Coatings - Rule 74.18 requires the use of low VOC coatings.

Included within Form AutoCoating004 is a **sample coating form**. This list can be used as a guide, to aid you in providing the following information:

- a) Please submit a list of the proposed coatings. This needs to include the manufacturer and product name or code for each component of a coating mixture. The mix ratio of the specific components must also be identified for each coating mixture.
- b) For each coating, indicate the proposed annual usage (in gallons).
- c) The Volatile Organic Compound (VOC) content of each coating mixture needs to be recorded, as computed on a minus water, minus exempt solvent basis.
- d) Identify the coating category (e.g. color coating, primer sealer, etc.) for each coating mixture.

 Refer to the "VOC Limits" attachment for more information.

The proposed coatings must meet the ROC (also known as VOC) limits specified in subsection B.1 of APCD Rule 74.18 (refer to "ROC Limits" attachment).

Please note that the proposed coatings shall contain no hexavalent chromium or cadmium. You will need to verify with your coating supplier that the coatings do not contain these compounds.

Hand-held, nonrefillable aerosol cans with a maximum net weight of 16 ounces are exempt from VOC limitations.

Please note that items covered in this application are not a comprehensive summary of APCD Rule 74.18, but in most cases include the items evaluated during permit processing. For complete information, please refer to APCD Rule 74.18.

INSTRUCTIONS FOR AUTOCOATING004 MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATIONS

Paint Stripping and Miscellaneous Surface Coating NESHAP Area Source Rule (Subpart HHHHHH)

A USEPA rule regulates emissions of hazardous air pollutants (HAPS) from small sources that perform spray application of coatings at autobody refinishing shops. The rule limits air emissions of certain metals referred to as target hazardous air pollutants (HAPs). The rule requirements include, but are not limited to, the following:

- Train/certify all painters
- Install and operate filters on spray booths that are at least 98% efficient
- All coatings must be applied in a spray booth
- Spray applied coatings must be applied with an HVLP spray gun, or equivalent technology
- Spray gun cleaning must be performed such that an atomized mist or spray of solvent is not created outside a container that collects used gun cleaning solvent

An Initial Notification and a Notification of Compliance must be submitted no later than 180 days after initial startup of a new facility.

You can petition for exemption from Subpart HHHHHH if you do not spray any coatings that contain chromium, lead, manganese, nickel, or cadmium (target HAPs). A Petition for Exemption must be completed and submitted to the District. If an exemption is granted, your APCD permit will be conditioned to prohibit the spray application of coatings containing target HAPs.

<u>INSTRUCTIONS FOR AUTOCOATING004</u> MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATIONS

VOC (ROC) Limits Attachment

Coating Category	Maximum VOC In Grams/Liter						
	As Applied, Computed On A Minus Water,						
	Minus Exempt Solvent Basis						
Adhesion Promoter	540						
Clear Coating	250						
Color Coating	420						
Multi-Color Coating	680						
Pretreatment Coating	660						
Primer	250						
Primer Sealer	250						
Single-Stage Coating	340						
Nonmetallic/Noniridescent							
Single-Stage Metallic/Iridescent	340						
Coating							
Temporary Protective Coating	60						
Truck Bed Liner Coating	310						
Underbody Coating	430						
Uniform Finish Coating	540						
Water-Reducible Electrophoretic	440						
Brake Component Coating							
Any other coating type (default)	250						

For definitions of each VOC coating category, please refer to APCD Rule 74.18. For coatings identified under certain coating categories, additional data may be required to substantiate that the coating falls under the designated category.

Pursuant to Rule 74.18.B.2, if anywhere on the container of any automotive coating, or any label or sticker affixed to the container, or in any sales, advertising, or technical literature supplied by a person, any representation is made that indicates that the coating meets the definition of or is recommended for use for more than one of the coating categories listed in Subsection B.1, then the lowest ROC content limit shall apply.