

**AIR POLLUTION CONTROL DISTRICT  
COUNTY OF SAN DIEGO**

**PROPOSED NEW RULE 67.20.1 –  
MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATIONS**

**WORKSHOP REPORT**

A workshop notice was mailed to owners and operators of automotive refinishing facilities, manufacturers, suppliers, and distributors of automotive coatings or cleaning materials in San Diego County. Notices were also mailed to the U.S. Environmental Protection Agency (EPA), the California Air Resources Board (ARB), all Economic Development Corporations and Chambers of Commerce in San Diego County, and other interested parties.

The workshop was held on July 15, 2009, and was attended by 59 people. Written comments were also received before and after the workshop. The workshop comments and District responses are as follows:

**1. WORKSHOP COMMENT**

Will tertiary butyl acetate (TBAC) be exempted from the rule? There is no clear coat with a VOC content of 2.1 grams/liter that is equivalent in quality to products with a VOC content of 3.5 grams/liter. It is possible, however, to reformulate the current clear coat into an equivalent product with the use of TBAC that complies with the proposed rule requirements.

**DISTRICT RESPONSE**

No, the District will not exempt the use of TBAC in Rule 67.20.1 at this time. There is still much uncertainty about the impact of TBAC on human health.

In 2004, EPA determined that TBAC has a low photochemical reactivity and thus its contribution to ozone formation is negligible. Consequently, EPA exempted the compound from the federal list of VOCs. In 2005, ARB developed a Suggested Control Measure (SCM) for Automotive Coatings, and performed a collaborative analysis with other relevant State agencies of the potential adverse health impacts of an exemption for TBAC. In studies with rats, TBAC has been shown to substantially metabolize to tertiary butyl alcohol (TBA), which can induce tumors in rats and mice. It was considered that the TBA carcinogenicity data may not have been relevant to human cancer risk assessment. However, the data was insufficient to allow for this determination. ARB therefore concluded that TBAC may pose a potential cancer risk to humans and left the decision on the TBAC exemption to local air districts.

Some of the districts have since provided either a complete or partial exemption for the use of TBAC in their automotive coating rules, while others have not exempted TBAC at all. It seems unlikely that manufacturers will use TBAC in materials made only for the regions where TBAC is exempt.

The District does not presently have the resources to conduct its own risk assessment to make a definitive determination in regards to the carcinogenicity of TBAC or of its metabolites. In consideration of the uncertainty of the potential health effects from exposure to TBAC, and that there are coatings currently available which do not contain TBAC and comply with the proposed VOC limits, the District has decided not to exempt TBAC at this time.

**2. WORKSHOP COMMENT**

Does the rule mandate the use of waterborne coatings? Can solvent based products be used if they can be reformulated to comply with the lower proposed limits?

**DISTRICT RESPONSE**

No, the rule does not mandate the use of waterborne coatings. Either solvent based or waterborne coatings may be used provided that their VOC contents comply with the VOC content limits in the rule.

**3. WORKSHOP COMMENT**

How will the proposed rule affect mobile coating operations?

**DISTRICT RESPONSE**

Similar to current Rule 67.20, proposed Rule 67.20.1 applies to all motor vehicle and mobile equipment coating operations, including stationary and mobile operations. While a mobile coating operation may be exempt from the District permit requirement per Rule 11 (Exemptions from Rule 10 Permit Requirements), if in a consecutive 12-month period it uses 20 gallons or less of coatings, or emits 150 pounds or less of VOC emissions, it would still be subject to Rule 67.20.1. Thus, as with a source operating under a District permit, a mobile coating operation that is exempt from permit requirements must still comply with the provisions of Rule 67.20.1, such as the VOC content limits and the various requirements for application equipment, cleaning materials and recordkeeping.

**4. WORKSHOP COMMENT**

South Coast Air Quality Management District (SCAQMD) exempts facilities that use no more than a total of 22 gallons/month of solvent based coatings and associated VOC containing cleanup solvents, while the limit for exemption from permit requirements in the District is 20 gallons/year. Are there any plans to revise this limit for consistency with the SCAQMD?

**DISTRICT RESPONSE**

No, at this time, the District does not have any plans to revise Rule 11 (Exemption from Rule 10 Permit Requirements). This rule provides an exemption from the permit requirement for any portable or stationary coating application operation that uses 20 gallons or less of coatings in a consecutive 12-month period, or has VOC emissions 150 pounds or less in the same period. It should also be noted that while facilities may be exempt from permit requirements per Rule 11, they will still be subject to the requirements of Rule 67.20.1 unless specifically exempted by the proposed rule.

**5. WORKSHOP COMMENT**

What is the difference between the exemption from permit requirements for operations using 20 gallons/year of coatings and the exemption in Rule 67.20.1 for operations using 25 gallons/year of coatings?

**DISTRICT RESPONSE**

District Rule 11 provides an exemption from the requirement for a permit to operate for any coating operation, including any automotive refinishing operation, which uses 20 gallons or less of coatings, or emits 150 pounds or less of VOC emissions in a consecutive 12-month period.

Proposed Rule 67.20.1 provides a limited exemption specifically for vehicle restoration activities, provided that no more than 25 gallons of noncompliant coatings are used in a calendar year. This exemption also limits the number of vehicles restored per year to 15 and applies only to certain provisions of the rule, namely the VOC content limits for coatings, materials for surface preparation or other surface cleaning, and cleaning materials for application equipment. All other provisions of Rule 67.20.1 will still apply.

**6. WORKSHOP COMMENT**

The cost of compliance with the rule can be passed onto consumers, but only to a limited extent, through an increase in the price of refinishing a vehicle. This is because the amount charged for refinishing work is controlled in large part by the insurance industry. If the cost of converting to waterborne products cannot be fully absorbed through increased prices to consumers, it will be even more difficult for automotive refinishing shops to comply with the new requirements of the rule.

**DISTRICT RESPONSE**

ARB estimates that the average cost to automotive refinishing facilities in California to comply with the requirements of the SCM will be about \$3,400 per year. If the entire cost of compliance were passed on to consumers, ARB estimates that the average price for a repair or refinish would increase by about \$11.

The District has contracted a consulting firm to prepare a Socioeconomic Impact Assessment Report (SIA) that will study the social and economic impact for businesses in San Diego County due to SCM implementation through adoption of proposed Rule 67.20.1. The analysis will recommend ways to minimize any significant adverse impacts to the local business community.

**7. WORKSHOP COMMENT**

How can a distributor sell non-compliant products for residential use, which is exempt in the rule, if the rule prohibits the sale of such products? This will cause a distributor to lose revenue from the lack of sales of non-compliant products.

**DISTRICT RESPONSE**

In response to ARB comment (please see Comment No. 38), the proposed rule was revised to specify that coatings applied on personal vehicles at private residences are required to meet the VOC content limits in Table 1. Thus, consistent with the requirements of the SCM, the prohibition of sale of non-compliant coatings for use in San Diego County will also apply to residential use. Consumers may also be discouraged from using non-compliant coatings to paint their own cars since additional efforts will be required to obtain non-compliant materials outside of San Diego County and California. Considering that the majority of cars manufactured in the U.S. are now painted with waterborne coatings, it is likely that such individuals will adapt to using the new products that comply with the rule.

**8. WORKSHOP COMMENT**

Does the prohibition of sale apply to those coatings that will be used outside of San Diego County?

**DISTRICT RESPONSE**

No, the prohibition of sale of non-compliant products only applies to those coatings that are sold for use in San Diego County.

**9. WORKSHOP COMMENT**

Why was the definition for “flop adjuster” added to the rule? Flop adjuster is company-specific and is not a generic industry term. The definition should be revised to “effect additive” for better clarity.

**DISTRICT RESPONSE**

The term “flop adjuster” was added for clarification since it is listed in the definition for “coating additive.” The definition is not substantial to the rule and thus has been removed.

**10. WORKSHOP COMMENT**

Will the District consider revisions to the VOC content limits proposed in the rule?

**DISTRICT RESPONSE**

No. For consistency throughout California, the District must implement the VOC content limits specified in the State SCM by incorporating them in Rule 67.20.1.

**11. WORKSHOP COMMENT**

Is there a penalty assessment chart for violations of the rule? What are the criteria for the assessment and are they available to the public?

**DISTRICT RESPONSE**

The factors considered by the District when determining penalty amounts for violations of air pollution laws, District rules, or permit conditions are specified in State law (Health and Safety Code Section 42400 et seq.) and include the extent of harm caused by the violation, the nature and persistence of the violation, and the violation duration. A summary of maximum penalties and other information regarding violations is available on the District's website at [www.sdapcd.org/comply/violation/VSProg.html](http://www.sdapcd.org/comply/violation/VSProg.html).

**12. WORKSHOP COMMENT**

Does a site need to maintain the manufacturer's technical information regarding the correlation between the handle air inlet pressure and air cap pressure for each brand and model high-volume low-pressure (HVLP) spray gun? Is information stamped on the spray gun itself adequate to show compliance?

**DISTRICT RESPONSE**

If the correlation option is used to demonstrate compliance, then a site must maintain the manufacturer's technical information regarding the correlation between the handle air inlet pressure and air cap pressure for each brand and model of spray gun used. Information stamped on the spray gun would not be adequate by itself to demonstrate compliance due to the extent of information that is required.

**13. WORKSHOP COMMENT**

Can equipment be purchased and used if the information mentioned above is not provided by the manufacturer?

**DISTRICT RESPONSE**

The rule does not prohibit the purchase of coating equipment for which supporting technical documentation is not available. However, operation of such equipment in San Diego County would violate the rule because there would be no method to demonstrate that the equipment is compliant.

**14. WORKSHOP COMMENT**

Are purchase and usage records, MSDS and data sheets required to be kept in the vehicle for mobile coating operations?

**DISTRICT RESPONSE**

Yes. These records are required to be maintained in the vehicle in order to demonstrate compliance with the rule.

**15. WORKSHOP COMMENT**

Does the District provide a standard recordkeeping form to make it easier for facilities to track their coating usage?

**DISTRICT RESPONSE**

Yes. Forms have been created by the District to assist regulated sources to comply with the recordkeeping requirements of Rule 67.20.1. These forms can be accessed from the District website at <http://www.sdapcd.org/comply/SBA/recordkpng.html>. Alternatively, businesses can contact the District Small Business Assistance Specialist at (858) 586-2656. It also should be noted that paint distributors or suppliers quite often provide recordkeeping forms reflecting the necessary information for the paints they sell.

**16. WORKSHOP COMMENT**

Is recordkeeping still required if a facility uses a cleanup solvent that has a VOC content that is less than 50 grams/liter, e.g., waterborne cleaners that have zero VOC content?

**DISTRICT RESPONSE**

The use of cleaning materials with zero VOC content would not require recordkeeping, as specified in the rule. However, the container label of the cleaning product, technical data sheet, or other supporting document should specify that the material does not contain any VOCs. The recordkeeping is required for all other compliant cleaning materials with a VOC content of 25 grams/liter or less as provided in Section (h) of the rule.

**17. WORKSHOP COMMENT**

Is a gun washer required if the solvent is not atomized and released to the air during the cleaning process?

**DISTRICT RESPONSE**

No. The proposed rule allows the option of either 1) the application equipment or equipment parts are cleaned in a container which is open only when being accessed for adding, cleaning, or removing application equipment or when cleaning material is being added, or 2) a system is used that totally encloses the component parts during the cleaning process, such as a gun washer.

**18. WORKSHOP COMMENT**

Does the rule require the use of both a gun washer and a cleanup solvent with a VOC content that is less than 50 grams/liter? For example, the San Joaquin Valley air district does not require the use of a gun washer if the VOC content does not exceed 25 grams/liter.

**DISTRICT RESPONSE**

The present draft of the rule has the option of using either a container which is open only when being accessed, or a totally enclosed system, such as a gun washer.

However, in response to ARB Comment No. 43, the proposed rule has been revised to reduce the VOC content limit for cleaning material to 25 grams/liter for consistency with the SCM. Also, if a cleaning material with a VOC content of 25 grams/liter or less does not contain any exempt compounds, the revised rule does not require any additional equipment to reduce emissions.

**19. WORKSHOP COMMENT**

Will it be required that an application to modify a permit to operate be submitted to the District if portable air dryers are installed in a spray booth to help with the drying process?

**DISTRICT RESPONSE**

No. An application for a permit modification will not be required for the installation of portable air dryers in a spray booth. These devices are typically attached to a facility's compressed air lines and used to provide additional air flow at localized areas of a vehicle's coated surface. Such devices are not a source of VOC emissions, nor would their use affect a change in emissions.

**20. WORKSHOP COMMENT**

Will the use of certain coatings that contain small amounts of nickel require an assessment for health risk at a facility that uses such coatings?

**DISTRICT RESPONSE**

Based on State guidance on industry-wide generic risk assessments for automotive refinishing facilities, the District currently does not conduct a health risk assessment for such sources provided that certain work practices are maintained, such as coatings are applied in a spray booth, and no coatings are applied that contain hexavalent chromium, cadmium or lead. In addition, automotive refinishing facilities are also subject to the federal requirements of the National Emission Standards for Hazardous Air Pollutants, Subpart HHHHHH. This federal rule regulates the use of coatings that contain compounds of chromium, cadmium, lead, nickel or manganese and similarly requires specific work practices intended to minimize emissions of these hazardous air pollutants.

However, in consideration of currently available waterborne coatings that comply with the proposed VOC content limits, and the composition of these products, especially their content of heavy metals and other toxic compounds, further evaluation by the District may be needed to determine if a generic health risk assessment would be warranted for a typical automotive refinishing facility.

**21. WRITTEN COMMENT**

Does "Zolatone 20 Multicolor" comply with the definition of "multi-color coating" or can it be classified as a "polychromatic" basecoat in which the appearance of paint's changes depending on how it's viewed?

**DISTRICT RESPONSE**

Multi-color coating, also known as spatter paint or spatter finish, is defined in the rule as a coating that exhibits more than one color once dried. A product such as Zolatone 20, which exhibits this property, is considered a multi-color coating.

Polychromatic paint is considered a metallic coating whereby the metal or iridescent particles in the paint cause the visual effect of changing the appearance of the paint, depending on the angle at which the paint is viewed. The rule defines "color coating" to include metallic/iridescent coatings.

**22. WRITTEN COMMENT**

What coating category will apply to automotive body fillers?

**DISTRICT RESPONSE**

Automotive body filler, also generally referred to as bondo, is categorized in the rule under “any other coating type.”

**23. WRITTEN COMMENT**

What coating category will apply to graphic design applications?

**DISTRICT RESPONSE**

Any coating that complies with the VOC content limits of the rule can be used. Graphic design applications are only exempt from the requirement to use high transfer efficiency coating application equipment.

**24. WRITTEN COMMENT**

Some paint manufacturers currently do not list the VOC content on the container label.

**DISTRICT RESPONSE**

Other air districts in California have already adopted revisions to their automotive refinishing rules in order to implement the SCM requirements. The majority of these rules require, beginning this year, that manufacturers list the VOC content on the container label. Therefore, most paint manufacturers should either already comply with the labeling requirement of these rules, or work towards achieving compliance by late 2009. By the time the proposed Rule 67.20.1 takes effect, the requirement to identify the VOC content of paint on the container label will apply throughout California.

**25. WRITTEN COMMENT**

Are handheld aerosols used for surface preparation exempt from the rule?

**DISTRICT RESPONSE**

Handheld aerosols used for surface preparation are not exempt from the rule. However, the rule has been revised to allow solvent usage for the removal of dust, wax, grease, tar, or bugs from a surface provided that the solvent is applied with a non-aerosol handheld spray bottle, the VOC content does not exceed 780 grams/liter, and no more than 20 gallons of the solvent are used per calendar year.

**26. WRITTEN COMMENT**

The language in Subsection (h)(1) suggests that recordkeeping is only required for any person subject to all the requirements of Subsections (d)(1) through (d)(5). For clarification, Subsection (h)(1) should be revised to “Any person subject to any of the provisions of Subsections (d)(1) through (d)(5).”

**DISTRICT RESPONSE**

The District agrees. The rule has been revised as suggested.

**27. WRITTEN COMMENT**

Subsection (h)(1)(i)(C) seems grammatically incorrect. Does it mean “actual and regulatory” VOC content of coatings?

**DISTRICT RESPONSE**

The subsection has been revised for clarification.

**28. WRITTEN COMMENT**

Will operation of an HVLP spray gun in excess of 10 psig result in enforcement action by the District?

**DISTRICT RESPONSE**

The rule defines HVLP as operating at an atomizing pressure between 0.1 and 10.0 psig. Thus, operation outside of this pressure range would be a violation of the rule that is subject to District enforcement action.

**29. WRITTEN COMMENT**

Some facilities apply only truck bed liner coatings that have zero VOC content. Are such operations still subject to Rule 67.20.1?

**DISTRICT RESPONSE**

No. Rule 67.20.1 defines a coating as a VOC containing material. Thus, application of zero VOC content material would not be subject to the rule. However, a facility shall still maintain records to demonstrate that all the materials applied at that facility do not contain VOCs.

**30. WRITTEN COMMENT**

The PPG Envirobase High Performance waterborne system has all the colors formulated for late model vehicles only as far back as 1999. If a customer requests an original color that predates 1999, a color match must be done in our shop or requested from PPG, which could take between one to two weeks to complete. Two possible resolutions to this issue would be: 1) the District allows us the use of solvent based coatings only for vehicles requiring a color match prior to 1999, and the use of waterborne coatings on all other vehicles if an OEM formula is available, or 2) the District allows us to operate as a restoration shop so that our facility will be exempt from the VOC content limits and other provisions in the rule.

**DISTRICT RESPONSE**

The proposed rule reflects requirements of the statewide SCM. The objective of this measure is to maximize the level of VOC emission reductions that may feasibly be attained through uniform use of lower VOC content automotive coatings in California, along with phasing out the manufacture and sale of non-compliant materials. Thus, the District cannot allow an exemption for the use of non-compliant coatings as suggested in cases where a color match using compliant coatings is not immediately available because such an exemption would be inconsistent with the requirements and intent of the SCM and corresponding rules throughout California.

In addition, the facility described above cannot be classified as a restoration shop and thereby be exempted from, among other requirements, the VOC content limits of the rule. The operations conducted at the facility do not comply with the limits specified for a restoration process, such that the amount of coatings used does not exceed 25 gallons per calendar year, not more than 15 vehicles are restored per calendar year, and no automotive refinishing operations other than vehicle restorations are conducted at the same facility.

**31. WRITTEN COMMENT**

Does the exemption from a permit to operate provided in District Rule 11 for coating operations that emit 150 pounds or less of VOCs per consecutive 12-month period also apply to mobile operations?

**DISTRICT RESPONSE**

Yes. The intent of Rule 11 is to exempt from the requirement for a permit any coating or adhesive application operation at a portable or stationary source where VOC emissions are 150 pounds or less in a consecutive 12-month period. If a mobile operation moves from one stationary source to another and wishes to be exempt from the requirement for a permit, its total VOC emissions should not be more than 150 pounds per 12-month period irrespective of the number of sources at which it operated.

**32. WRITTEN COMMENT**

Can there be an allowance in the rule for the use of non-compliant coatings specifically for touch-up applications only? The coatings would be stored in a separate and distinct kit, comprised of a few 1-2 ounce bottles of paint toners along with application and removal materials.

**DISTRICT RESPONSE**

Yes. The rule has been revised to include an exemption for touch-up coatings from the rule. In consideration that only minimal amounts of coatings are used for touch-up applications, and that touch-up applications are conducted with non-atomizing application methods, the District anticipates any difference in VOC emissions to be negligible.

**33. WRITTEN COMMENT**

Will the District require mobile operators to register their operations for a nominal fee, similar to what Bay Area AQMD Regulation 8, Rule 45, requires? The benefits of a registration program for mobile coating operations would be to increase awareness by the industry of the rule requirements, better enable the District to regularly inspect such operations, and thereby improve the level of compliance for all mobile operations.

**DISTRICT RESPONSE**

At this time, the District does not plan to require registration of mobile automotive coating operations due to limited District resources to implement and enforce such a program. However, all mobile automotive coating operations, whether or not operating under a District permit, are subject to Rule 67.20.1 and must comply with the requirements of the rule. As provided by District Rule 11, coating operations that use 20 gallons or less, or emit 150 pounds or less of VOC emissions in a consecutive 12-month period are exempt from the permit requirement with the District. See also response to Comment No. 3.

**34. WRITTEN COMMENT**

Does the rule allow for a transition period in which coatings manufactured after a certain date would be required to display the actual or “as supplied” VOC content on the container label?

**DISTRICT RESPONSE**

Upon the date of rule adoption, manufacturers must comply with the labeling requirements of the rule. The District anticipates submitting proposed Rule 67.20.1 to the Air Pollution Control Board for adoption in early 2010. This should be an adequate transition period considering that other air districts in California have already adopted new automotive refinishing rules that are, or soon will be, in effect and implement similar labeling requirements as those in Rule 67.20.1.

**35. WRITTEN COMMENT**

Can a manufacturer provide the regulatory or “as applied” VOC content in a technical data sheet or product bulletin instead of displaying the content on the container label as the proposed rule requires?

**DISTRICT RESPONSE**

Yes. Subsection (g)(2) of the propose rule has been revised to allow that the regulatory VOC content of coatings be printed on either the container label or manufacturer data sheet.

**36. WRITTEN COMMENT**

Military facilities have separate and additional standards for coatings and solvents applied to military tactical support vehicles and equipment to ensure equipment compatibility and functionality in combat. To make certain these combat-driven standards are met, products undergo an extensive evaluation process before they can be included on the Qualified Products List (QPL) for each military-specific operation. Only those products that meet military specifications (mil-specs) and are included in the QPL are approved for use by the U.S. Department of Defense.

For a number of military-specific operations, there currently are no mil-spec approved coatings and solvents that meet the proposed VOC standards in Rule 67.20.1. Adoption of the proposed new rule will result in adverse impacts to those coating and cleaning operations on military installations within San Diego County that maintain military equipment in support of training and combat activities crucial to national security. Therefore, it is requested that the VOC content limits for coatings and associated cleaning materials not apply to coating operations for U.S. military tactical vehicles and equipment.

**DISTRICT RESPONSE**

The District agrees. Rule 67.20.1 has been revised to exempt coating operations for military tactical support vehicles and equipment from the rule’s VOC content limits only. However, this limited exemption will be allowed provided that the coatings and associated cleaning materials used at these operations comply with the VOC content standards of current Rule 67.20. Coating operations for tactical support vehicles and equipment will remain subject to all other provisions of Rule 67.20.1.

In addition, in accordance with the limited exemption described above, the provisions in Rule 67.20.1 that prohibit the manufacture or sale, specification, and possession of non-compliant coatings have been revised to allow for the sale and use of coatings that don't comply with the standards of Rule 67.20.1 for military coating operations.

**37. WORKSHOP COMMENT**

Why are coating operations conducted at a residence exempt from the rule? These individuals should also be subject to the rule in order to maximize the amount of emissions that are reduced.

**DISTRICT RESPONSE**

Please see response to the following ARB Comment No. 38.

**38. ARB COMMENT**

Subsection (b)(1)(i) should be revised to require that individuals who apply coatings on their personal vehicles at their own residence use products that meet the VOC limits specified in Subsection (d)(1).

**DISTRICT RESPONSE**

The District agrees. The rule has been revised as suggested.

**39. ARB COMMENT**

Subsections (a)(2) and (a)(3) should be moved to Section (b).

**DISTRICT RESPONSE**

The District disagrees. Section (b) – Exemptions, describes the processes that are exempt, either from all or only specific provisions of Rule 67.20.1. While a process may be exempted from the rule per Section (b), the rule nevertheless still applies to that process in general. Subsections (a)(2) and (a)(3) describe the operations to which the rule does not apply. Therefore, it is more appropriate to keep the language of Subsections (a)(2) and (a)(3) in Section (a) – Applicability.

**40. ARB COMMENT**

The exemption provided for motor vehicle restoration activities in Subsection (b)(3) should be removed from the rule. Districts that have revised their rules for Motor Vehicle and Mobile Equipment Coating operations to reflect the SCM do not have this exemption. Removing the exemption would provide consistency with other district rules, e.g., South Coast AQMD and San Joaquin Valley Unified APCD, and maximize the emission reduction benefits.

**DISTRICT RESPONSE**

The District disagrees. Subsection (b)(3) provides a limited exemption from certain provisions of the rule, namely the VOC content limits for coatings and surface preparation or cleaning materials, and coating application equipment requirements. However, all other provisions of the

rule will still apply. The exemption applies specifically for motor vehicle restoration facilities provided that no more than 25 gallons of noncompliant automotive coatings are used per calendar year, no more than 15 vehicles are restored per calendar year, and no other refinishing operations are conducted at the facility. The exemption would be necessary to allow the use of non-compliant coatings during the restoration process of an antique or classic vehicle (to restore the vehicle to its original appearance) if a color match is not available using products with the lower VOC content.

To date, there is only one permitted facility in San Diego County that conducts motor vehicle restoration work and to which the exemption in Subsection (b)(3) would apply. Due to the lengthy restoration process (about one year or more per vehicle) and the few vehicles that are restored in a year, the VOC emissions from this one facility account for only about 0.2 tons per year, or 0.03% of the total annual emissions from all permitted automotive refinishing operations in the county. Thus, the level of emission reduction benefit that may result by the removal of this exemption from the rule will be minimal.

**41. ARB COMMENT**

A definition for “assembly line” as provided in the SCM should be added to Section (c).

**DISTRICT RESPONSE**

The District agrees. The rule has been revised as suggested.

**42. ARB COMMENT**

The definition for “automotive refinishing facility” in Subsection (c)(7) should be revised to “...where motor vehicle or mobile equipment coating operations take place.”

**DISTRICT RESPONSE**

The District agrees. The rule has been revised as suggested.

**43. ARB COMMENT**

The VOC content limit for cleaning material used for cleaning of coating application equipment or surface preparation should be reduced from 50 grams/liter to 25 grams/liter. Other districts have successfully implemented a 25 grams/liter limit for cleaning materials used in these activities.

**DISTRICT RESPONSE**

The District agrees. The rule has been revised as suggested.

**44. EPA COMMENT**

All of the test methods specified in the SCM should be added to Section (i).

**DISTRICT RESPONSE**

The District added the most recent test methods necessary to ensure compliance with the proposed rule.

**45. EPA COMMENT**

Exemptions from the proposed rule for operations performed at a residence, and motor vehicle restoration processes should be removed.

**DISTRICT RESPONSE**

Please see responses to ARB Comment Nos. 38 and 40.

**46. EPA COMMENT**

The solvent limit in Subsections (d)(4)(i) and (d)(5) should be reduced from 50 grams/liter to 25 grams/liter.

**DISTRICT RESPONSE**

Please see response to ARB Comment No. 43.

**47. EPA COMMENT**

Subsection (g)(2) should include the following items to provide sufficient information for determining VOC content and to improve demonstration of compliance: weight percentage of volatiles, water and exempt compounds; volume percentage of water and exempt compounds; and the density of material in grams per liter.

**DISTRICT RESPONSE**

The District disagrees. The additional information listed above is not necessary to demonstrate compliance with the rule provided that the mix ratio and the VOC content of coatings (actual and regulatory) are provided on the coating label or supporting data sheet.

**48. EPA COMMENT**

The following should be added in Subsection (h)(1)(i): application method, and specification of material as a coating or solvent.

**DISTRICT RESPONSE**

The District disagrees. It is not necessary to require the specification of material as a coating or solvent because Subsection (h)(1)(i) already requires that the type and applicable coating category of each coating be listed. In addition, listing of application method for each coating is not necessary because the majority of automotive refinishing facilities operating in San Diego County use HVLP spray guns.

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