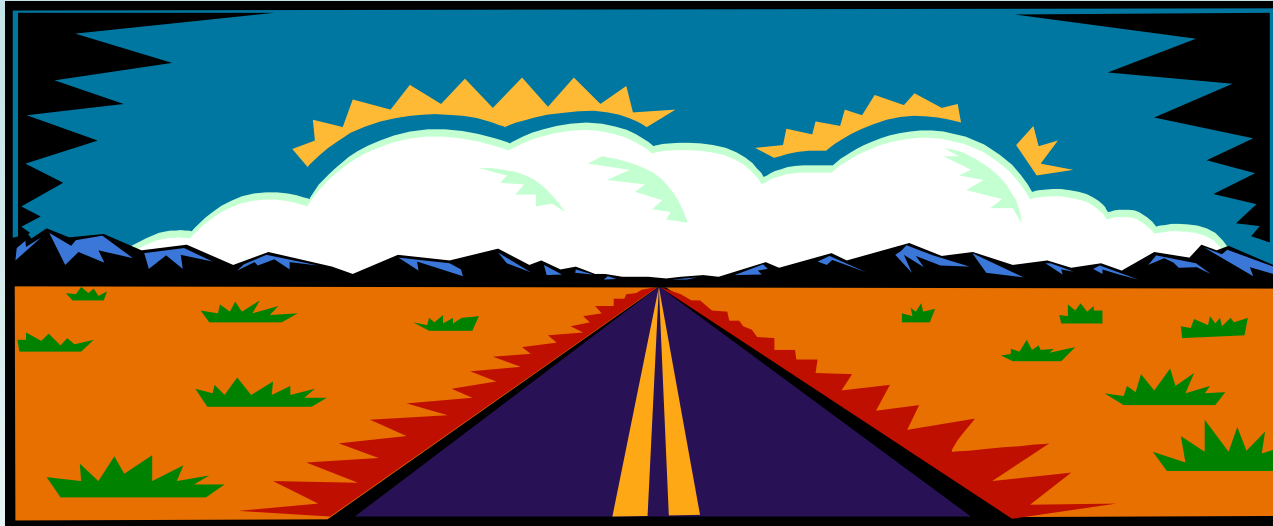


San Diego Air Pollution Control District
www.sdapcd.org



Rule 67.20
Motor Vehicle and Mobile Equipment
Refinishing Operations
Kevin Heiss, Small Business Assistance
858-586-2656

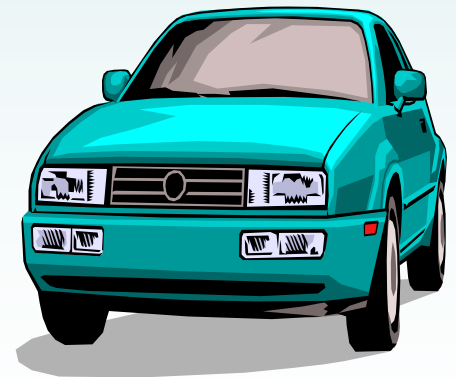
APCD Coating Permit Required

- For coating operations where usage exceeds 20 gallons or 150 pounds of VOC emissions per consecutive 12-month period.
- If you claim you are below these levels, you must keep on-going purchase and usage records.

Rule 67.20

Motor Vehicle and Mobile Equipment Refinishing Operations (Primarily Auto Body Shops)

- Rule 67.20 applies to the refinishing of:
 - Motor vehicles
 - Mobile equipment
 - Bicycles
 - Non-motorized models
 - Component parts





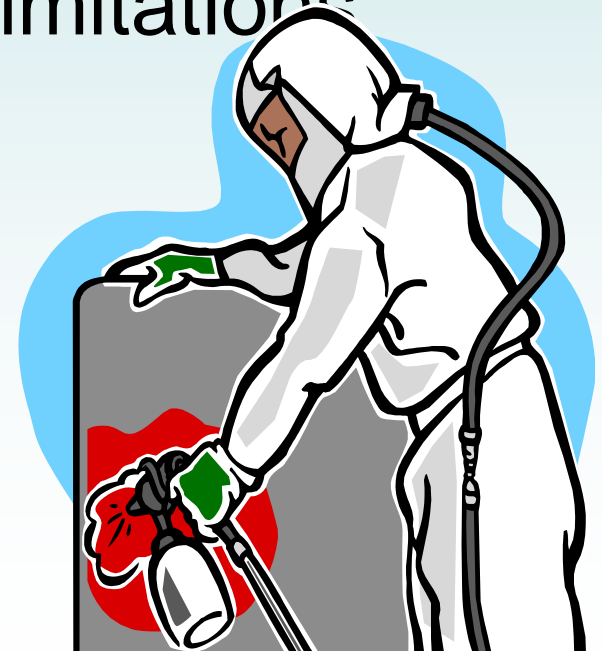
Reason For Rule 67.20; Ozone Health Effects



- Short Term (Acute) Exposure:
 - coughing, chest pains, headaches, eye / throat irritation, nausea, asthma attacks, loss of lung capacity, respiratory damage
- Long Term (Chronic) Exposure:
 - Changes to immune system, aging of lung tissue, loss of lung tissue, susceptibility to respiratory infection

Summary of Rule 67.20 Requirements

- Coating VOC limits
- Precoat usage limitations
- Specialty coating usage limitations
- Application equipment
- Surface preparation
- Equipment cleaning



Coating VOC limits

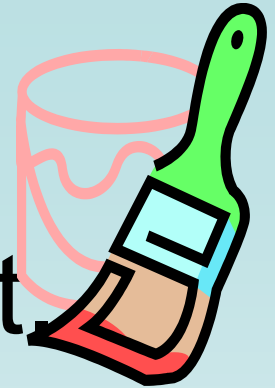
Rule 67.20(d)(1)(i)



- Group I & Group II where color match is required
 - Pretreatment coating: 780 g/l 6.5 lbs/gal
 - Precoat : 600 g/l 5.0 lbs/gal
 - Primer/primer surfacer: 420 g/l 3.5 lbs/gal
 - Primer sealer: 420 g/l 3.5 lbs/gal
 - Specialty coatings: 840 g/l 7.0 lbs/gal

Coating VOC limits

Rule 67.20(d)(1)(i) cont.



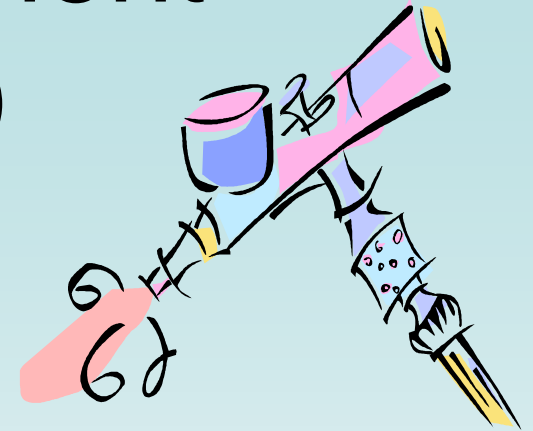
- Topcoats:

– Metallic/iridescent:	520 g/l	4.3
lbs/gal		
– Multicolor:	685 g/l	5.7 lbs/gal
– Multistage:	540 g/l	4.5 lbs/gal
– Multicolor multistage:	480 g/l	4.0 lbs/gal
– All other topcoats:	420 g/l	3.5 lbs/gal

Application Equipment

Rule 67.20(d)(5)

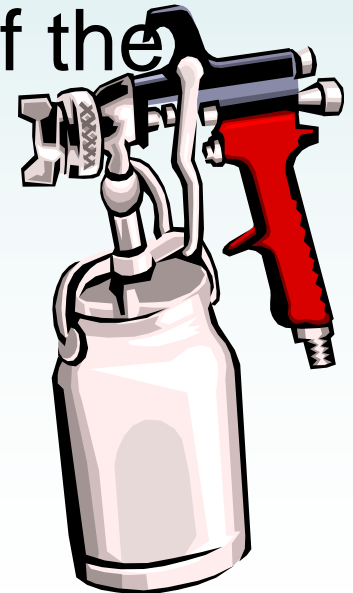
- Electrostatic spray application
- Flow coating
- Dip coating
- High Volume Low Pressure (HVLP)
- Roll coat
- Hand application (roller / brush)



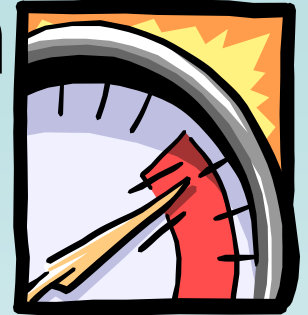
High Volume Low Pressure

Pressure

- A coating application method which uses pressurized air at a permanent pressure between 0.1 and 10.0 psig, not to exceed 10 psig, measured at the air cap of the coating application system



HVLP Documentation



- Air cap pressure must be verified by:
 - An air cap pressure gauge for each spray gun that will measure the pressure directly at the cap.
 - An air pressure handle inlet gauge with manufacturers information correlating handle inlet pressure with the air cap pressure.

Surface Preparation Materials

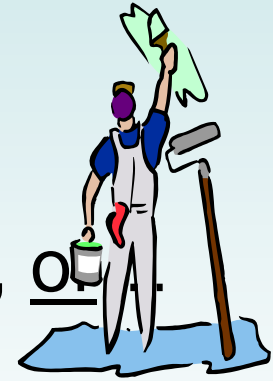
- VOC containing materials used for surface preparation must meet one of the following criteria:
 - Contain not more than 200 g/l VOC, or...
 - Have an initial boiling point of 374 degrees F or greater, or...
 - Have a total VOC vapor pressure of 20 mm Hg or less at @ 68 degrees F



Surface Preparation of Plastic Parts

- VOC containing materials used for surface preparation of plastic parts must meet one of the following criteria:

- Contain not more than 780 g/l VOC, or



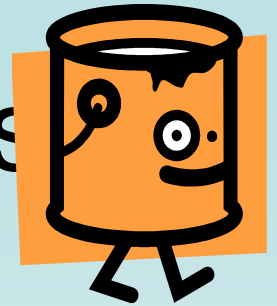
- Have a total VOC vapor pressure of 45 mm Hg or less at @ 68 degrees F

Cleaning of Application Equipment



- Equipment cleaning solvents must:
 - Meet the requirements for surface preparation solvents or...
 - Be flushed or rinsed through the equipment in a contained manner, or...
 - Be used in a container which is only opened for adding, cleaning, or removing equipment or solvent, and that allows the parts to drip dry, or...
 - Be used in a system that totally encloses the parts being cleaned

Manufacturer / Supplier information requirements



- **Suppliers must provide the following information:**
 - **Name & identification of each coating, component, material**
 - **Recommended mix ratios for multi-component coatings**
 - **VOC content (as applied less water and exempt compounds) according to manufacturers mix ratios**
 - **VOC content of each material:**
(per volume of material and less water and exempt compounds)
 - **Vapor pressure, boiling point, VOC content as applicable**

Rule 67.20 Recordkeeping

- Operations subject to this rule must maintain all records necessary to evaluate compliance.
- Sample record keeping forms are available on the APCD website at: www.sdapcd.org/comply/SBA/recordkpngforms.html
- Maintain a minimum of three years worth of records on site.



Current list of all coatings and VOC containing materials: (all information necessary to determine compliance)

- Manufacturer name & identification for each coating, coating component, additive, thinner, solvent used
- Coating or solvent category
- Identification of all low VOC primers or primer surfacers used



Material usage records



- Maintained on a monthly or daily basis
- Your permit may require daily records
- Including:
 - Manufacturer identification, amount of each coating, coating component, solvent used, mix ratios, type of vehicle, whether color match was required

Manufacturers information



- Maintain all records provided by the manufacturer:
Name & identification of each coating, component, material
 - Recommended mix ratios for multi-component coatings
 - VOC content (as applied less water and exempt compounds) according to manufacturers mix ratios
 - VOC content of each material:
(per volume of material and less water and exempt compounds)
 - Vapor pressure, boiling point, VOC content as applicable

Rule 67.20 Will Be Changing Soon!

- Consideration by APCD Advisory Committee in Fall 2009
- Consideration by Air Pollution Control Board in early 2010
- Changes will become effective 1 year after date of adoption for existing facilities
 - Time for changeover and training
 - New facilities must comply upon initial startup

Proposed Rule 67.20 Changes

- Sets lower VOC limits for most coating categories
- Replaces specialty coating category with individual coating categories
- Eliminates composite VOC limit (averaging) for multistage systems and distinction between Group I and Group II vehicles
- Revises existing exemptions in the rule

Proposed Rule 67.20 Changes

- Coatings
 - Lower VOC content limits for most coatings
- Cleaning Materials
 - Lower VOC content limit for cleaning materials to 50 grams/liter (SCM limit is 25 g/l)

Proposed Rule 67.20 Changes

- Prohibitions on
 - Manufacture or sale of non-complying materials
 - Possession of non-complying materials at automotive refinishing facilities
- Labeling and additional product documentation requirements for manufacturers and suppliers

Contact Information For Rule 67.20 Changes

- Randy Consolacion
(858) 586-2752
Randy.Consolacion@sdcounty.ca.gov
- Natalie Yates
(858) 586-2756
Natalie.Yates@sdcounty.ca.gov
- Robert Reider
(858) 586-2640
Robert.Reider@sdcounty.ca.gov

Rule 67.17: Open Containers

- All containers used to store, transfer, apply, or otherwise employ VOC shall be kept closed when not in use
 - Includes all VOC containing materials (new material, waste material, rags containing VOC, etc...) in containers with a capacity greater than one pint.



Rule 67.6.1 – Cold Solvent Cleaning and Stripping Operations (Auto Repair Shops)

- Does not apply to wipe cleaning operations or cleaning of application equipment (i.e. spray guns)
- Does not apply to small cold solvent cleaning or stripping equipment (less than 1 gallon or 1 square foot). These sizes also mark the point at which an APCD permit is required.
- Cold solvent cleaners used exclusively for educational purposes
- Operations exclusively using “water-based material” with a VOC content 50 grams per liter (g/l) or less. Records of the VOC content of the materials used must be kept.
“Water based material” contains only water and VOC, but

Rule 67.6.1 – Requirements

- VOC content limit of solvent= 50 g/l or less
 - Cleaning of electronic components, electrical components, medical devices, aerospace components, or precision optics exempt from this requirement
- Remote Reservoirs – freeboard height at least 6 inches
- Stripping – freeboard ratio at least 0.75 or a sealing fluid
- Other operational and equipment standards the same as current Rule 67.6

Recordkeeping Requirements

Rule 67.6.1

- Keep records of which cleaning, stripping material, and sealing fluid are used.
- Information regarding the VOC content of material used for cold solvent cleaning.
- No requirement for solvent usage records.

The End!