



June 13, 2011

COMPLIANCE ADVISORY

Notice to Automotive Coating Operations

The purpose of this advisory from the San Diego Air Pollution Control District (District) is to highlight some new requirements for the automotive coating industry. These requirements are specified in District Rule 67.20.1 (Motor Vehicle and Mobile Equipment Coating Operations), which can be found at <http://www.sdapcd.org/rules/Reg4pdf/R67-20-1.pdf> and in the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart HHHHHH (6H), which can be found at <http://www.sdapcd.org/rules/Appendix/AppenB/SubpHHHHHH.pdf>. Please note Rule 67.20.1 will go into effect for all existing automotive coating facilities on June 30, 2011, and NESHAP 6H has been in effect since January 10, 2011.

Prohibition of Possession - Rule 67.20.1(f)(3)

A person shall not possess at any automotive refinishing facility any automotive coating or associated cleaning material with a volatile organic compound (VOC) content in excess of the limits specified in the standards of Rule 67.20.1. Automotive coatings and cleaning solvents not meeting the VOC content of Rule 67.20.1 must be removed from automotive coatings facilities prior to June 30, 2011. The District also advises that un-labeled paint containers will be considered as having non-compliant coatings. It will also be the responsibility of the facility to ensure paint container labels are legible (no paint covering identification information). Any container with an illegible label will be considered the same as unlabeled (i.e., containing non-compliant paint) and subject to enforcement action.

The exceptions to this prohibition are for a motor vehicle restoration process (Exemption (b)(3)), some surface preparation solvents (Exemption (b)(6)), or for use with control equipment as specified in Section (e) of the rule. The District will also allow a cleaning solvent concentrate to be on site if the manufacturer's recommended (compliant) mix ratio and usage records showing the actual mix ratio of the concentrate are on site.

Filter Compliance - NESHAP 6H, Section 63.11173 (e)(2)

The District is also enforcing NESHAP 6H at automotive coatings facilities and mobile coating operations. NESHAP 6H establishes standards for the spray application of coatings containing compounds of chromium, lead, manganese, nickel, or cadmium (hazardous air pollutants - target HAPs). However, please note the state air toxic control measure (ATCM), Title 17 CCR, Section 93112, and/or your permit to operate already prohibit the use of hexavalent chromium and cadmium at automotive coatings facilities.

OVER

All automotive coating facilities (except those that submitted a petition for exemption and do not spray apply coatings with target HAPs) shall apply all spray-applied coatings in a spray booth, preparation station, or mobile enclosure that meets the requirements of the 6H regulation. All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter that is demonstrated to achieve at least 98-percent capture of paint overspray. In order for facilities to demonstrate compliance with the filter efficiency requirement, documentation of the filter efficiency of any spray booth exhaust filter must be kept on site. This documentation must correlate to the filter installed through an identification number or description. The box the filter was packaged in or any other means necessary to compare the filter installed with the filter efficiency documentation should be kept on site.

Reports to Submit - NESHAP 6H, Section 63.11176

If you are the owner or operator of a motor vehicle or mobile equipment coating operation and any information from the initial notification, notification of compliance status form, or a previous Annual Notification of Changes (ANC) report has changed, you are required to submit an ANC report by March 1st of that year. Other deviations requiring an ANC report would be any non-compliance with the requirements in 63.11173(e) through (g).

Spray Booth Modification

If you plan to build, erect, alter, or replace a spray booth at a permitted facility, you must first obtain authorization from the District. This requirement is stated in District Rule 10(a), which can be found at <http://www.sdapcd.org/rules/Reg2pdf/R10-10-1.pdf>. However, the District will not require authorization for the replacement of filters (rated equivalent) or adding auxiliary or non-permanent equipment to a booth, such as portable fans or heaters.

You may also contact the District's Small Business Assistance Specialist, Eric Luther at (858) 586-2656, to discuss District requirements.

EL:jlm