



April 10, 2013

COMPLIANCE ADVISORY

Volatile Organic Compound (VOC) Content Information Provided by Automotive Coating Manufacturers

The San Diego Air Pollution Control District (District) requires manufacturers of automotive coatings to provide to their customers with VOC content for the products sold for use in San Diego County, in accordance with District Rule 67.20.1(g). The website link to this rule is: <http://www.sdapcd.org/rules/Reg4pdf/R67-20-1.pdf>.

During recent inspections of automotive coating facilities, District inspectors have found conflicting VOC content information for the same material. For example, the VOC content provided on the paint container label might be different than the VOC content provided on a material safety data sheet (MSDS) or a wall chart. Inconsistent VOC content information makes compliance determinations more difficult and might result in compliance actions against the facility, distributor and/or manufacturer for violating the requirements in Rule 67.20.1.

The purpose of this advisory is to inform you of this issue and avoid compliance actions. The District recommends coating manufacturers review the VOC content information provided on paint container labels, MSDS sheets, wall charts or any other documentation for consistency and accuracy.

District Rule 67.20.1 requires automotive coating manufacturers and distributors to provide the following content:

MANUFACTURER & SUPPLIER INFORMATION

Any person who manufactures, sells, offers for sale, or supplies any coating, coating component, or associated cleaning material for use in motor vehicle and mobile equipment coating operations in or outside of San Diego County shall provide the following content to customers:

- (1) The manufacturer's name and identification of each coating or coating component, component's mix ratio, surface preparation and cleaning material; and*
- (2) The applicable coating category (ies) as specified in Subsection (d)(1) and the VOC content of coatings, actual and VOC content of coatings, regulatory, as supplied, expressed in grams per liter or pounds per gallon and printed on a coating container label and/or manufacturer data sheet for each automotive coating, and automotive coating component.*
- (3) The VOC content of each cleaning material as supplied, expressed in grams per liter or pounds per gallon, and printed on the cleaning material's container label.*

If you have any questions regarding District rules or requirements, please contact Eric Luther, District Business Assistant, at (858) 586-2656.

EL:jlmm