



Air Pollution Control Board
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COMPLIANCE ADVISORY

NOTICE OF ADOPTION OF RULE 67.20 - MOTOR VEHICLE AND MOBILE EQUIPMENT REFINISHING OPERATIONS

On November 13, 1996, the Air Pollution Control District adopted Rule 67.20, a new rule that regulates volatile organic compound (VOC) emissions from motor vehicle and mobile equipment refinishing (painting) operations. The rule applies to all commercial refinishing operations regardless of the amount of coatings used unless specifically exempted by the rule, as described below.

RULE 67.20 REQUIREMENTS BECOME EFFECTIVE ON AUGUST 13, 1997.

The District Compliance Division is preparing Compliance assistance materials and a training course for owners and operators of automotive refinishing operations. The training course should be available in Spring of 1997. If you are interested in information or in attending the training, please contact Karen Wilkins at (619) 495 - 5106.

New rule 67.20 includes the following:

- Applicability** Rule 67.20 applies to all commercial finishing and refinishing coating operations for motor vehicles, bicycles, public transit buses and mobile equipment. Mobile equipment includes truck bodies and trailers, utility bodies, camper shells, locomotives, railcars, trolleys, military vehicles, aircraft ground support equipment, mobile cranes, bulldozers, street cleaners, golf carts, farm equipment, and their components.
- Exemptions** The following operations are exempt from all Rule 67.20 requirements:
- Coating of original equipment manufacturer's (OEM) parts during production. Instead, Rules 66, 67.3, 67.11, or 67.12 apply to these coating operations, as applicable.
 - Noncommercial painting operations performed by individuals on their own vehicles at their residences.
 - Coatings applied using non-refillable handheld aerosol containers, touch up coatings, graphic design coatings, body fillers, and bedliner coatings.
 - Coating of radiators or engine components. Rule 67.3 applies to these coating operations.
 - Painting of mobile homes. Rule 67.0 applies to these coating operations.
 - Equipment used for surface preparation during motor vehicle and mobile equipment refinishing operations. Rule 67.6 applies to this equipment.

Motor vehicle restoration operations are exempt from the coating VOC content limits in the rule, but are required to keep specified records, use approved coating application equipment, and comply with other rule requirements for surface preparation, equipment cleaning and waste disposal:

- Annual coatings usage at a restoration facility may not exceed 50 gallons and no more than 30 vehicles may be restored per calendar year. Each vehicle restoration must take more than sixty days and no other motor vehicle or mobile equipment finishing or refinishing operations may occur at the facility.

In addition, coatings applied to the underbody and topcoat sealants are exempt from the VOC limits, coating application equipment requirements and some of the recordkeeping requirements.

Definitions	The rule provides definitions for terms used in the automotive refinishing industry.
VOC Limits	The rule specifies VOC content limits for pretreatment coatings, precoats, primers, primer surfacers, primer sealers, topcoats, temporary protective coatings and specialty coatings.
Application Equipment	Facilities must use high transfer efficiency application equipment such as high-volume low-pressure (HVLP) spray guns or electrostatic spray equipment. Conventional air atomized spray equipment will not be allowed on and after August 13, 1997 (except for the limited exempted operations listed above).
Surface Preparation and Equipment Cleaning	<p>Facilities must use materials with low VOC content, high boiling point or low VOC vapor pressure for surface preparation and coating application equipment cleaning.</p> <p>Enclosed cleaning devices (which minimize VOC emissions into the atmosphere) can also be used for spray equipment cleaning.</p>
Waste Disposal	The rule prohibits the use of coating spray equipment or any similar means to dispose of waste coatings into the air. This doesn't apply to momentarily purging coating material from a spray applicator cap immediately before or after applying coatings.
Manufacturer and Supplier Requirements	Coating manufacturers and suppliers must maintain sales records of all coatings, surface preparation and cleaning materials sold for use in San Diego County, and disclose to customers the VOC contents and other information necessary to determine compliance.
Control Equipment	Add-on air pollution control equipment with at least 85% overall VOC emission reduction efficiency may be used as an alternative to complying with the VOC limits for coating and cleaning materials. If a facility proposes to install air pollution control equipment, an application for Authority to Construct and Permit to Operate must be submitted to the District by August 13, 1997, purchase orders for the equipment must be issued by May 13, 1998, and the equipment must be fully operational and in compliance by May 13, 1999.

- Recordkeeping Requirements** Rule 67.20 requires all facilities to keep records. These records must include a current list of coatings, applicable coating categories (such as primers, pretreatment coatings, etc.), manufacturer identification, monthly (or daily) usage of each coating, mix ratios and VOC information provided by coating manufacturers or suppliers.
- Test Methods** Test methods for determining compliance are specified in the rule. However, compliance will most often be based on the type of application equipment being used, methods and/or materials used for surface preparation and clean up, and manufacturer/supplier data on VOC content of coatings and solvents.

If you would like a copy of Rule 67.20 please call Juanita Ogata at (619) 694-8851. For more information, please call the District's Compliance Division at (619) 694-3340.

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