

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

WORKSHOP REPORT

**AIRBORNE TOXIC CONTROL MEASURE (ATCM) FOR
EMISSIONS OF HEXAVALENT CHROMIUM AND CADMIUM
FROM MOTOR VEHICLE AND MOBILE EQUIPMENT COATINGS**

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

A workshop was held on June 23, 2003. One person attended the workshop. Oral comments were received before and during the workshop from affected businesses.

The workshop comments and District responses are as follows:

1. WORKSHOP COMMENT

How will the District enforce the ATCM?

DISTRICT RESPONSE

District staff will inspect distributors (jobbers) of automotive coatings to verify that no coatings containing hexavalent chromium or cadmium are available for sale after June 30, 2003. The emphasis for inspections will be on coatings readily available for sale on the shelves and not on products held in bulk storage areas.

In addition, the staff currently inspects motor vehicle and mobile equipment coating facilities to enforce the provisions of Rule 67.20. Subsequent inspections of these facilities will include a review for compliance with the ATCM. As required by the ATCM, after December 31, 2003, no owner or operator of a motor vehicle or mobile equipment coating facility will be allowed to use or possess any automotive coating that contains hexavalent chromium or cadmium.

2. WORKSHOP COMMENT

If after June 30, 2003, distributors pack up all unsold automotive coatings in their inventory that contain hexavalent chromium or cadmium, and label them "Not for Sale" with the intent of the coatings being returned to the manufacturer, will they be in violation of the ATCM for storing the coatings on the premises before being transferred to the manufacturer?

DISTRICT RESPONSE

Possession of prohibited coatings after a specific date is applicable to motor vehicle or mobile equipment coating facilities only, and does not apply to distributors. The ATCM has an exemption allowing coatings containing hexavalent chromium or cadmium and manufactured before January 1, 2003 to be sold until June 30, 2003. If after June 30, 2003, a distributor has on the property automotive coatings containing hexavalent chromium or cadmium, and does not sell such coatings for use in California, that distributor would not be in violation of the ATCM. However, the District recommends that distributors remove or dispose of prohibited products by or soon after June 30, 2003 in order to ensure full compliance with the ATCM.

3. WORKSHOP COMMENT

Has the District developed a comprehensive list of automotive coatings prohibited by the ATCM?

DISTRICT RESPONSE

No. A list of prohibited coatings containing hexavalent chromium or cadmium would be difficult to develop due to the number of coatings affected. The best ways to determine if an automotive coating contains hexavalent chromium or cadmium would be to either refer to the product's Material Safety Data Sheet (MSDS) or to consult directly with the manufacturer.