

**Air Pollution Control Board**

Greg Cox	District 1
Dianne Jacob	District 2
Pam Slater	District 3
Ron Roberts	District 4
Bill Horn	District 5

Air Pollution Control District

R. J. Sommerville	Director
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COMPLIANCE ADVISORY

NOTICE OF AMENDMENTS TO RULE 67.0 ARCHITECTURAL COATINGS

On December 12, 2001, the Air Pollution Control Board adopted amendments to existing District Rule 67.0, which controls volatile organic compound (VOC) emissions from architectural coating operations. The rule was first adopted in 1977 and was amended to implement state-mandated requirements.

Rule 67.0 applies to the manufacture, sale, and use of architectural coatings which includes a variety of residential, commercial, and industrial paints, stains, varnishes, and other specialty coatings.

The amendments to Rule 67.0 accomplish the following:

Applicability	Clarifies that the rule also applies to manufacturers of architectural coatings for use in San Diego County.
Exemptions	<p>Adds an exemption for any architectural coating that is sold or manufactured for use outside San Diego County or for shipment to other manufacturers for reformulation or repackaging.</p> <p>Exempts aerosol coating products regardless of container capacity (previously limited to one liter or less).</p> <p>Adds an exemption from VOC limits for lacquers when applied under specified meteorological conditions. Limits the amount of thinning allowed.</p>
Definitions	Adds, deletes, and amends certain definitions for clarification.
Standards	Adds 19 new coating categories that reflect the specialized nature of certain architectural coating applications. Adds VOC limits for these new categories that are immediately effective. However, most limits are the same as have been in effect for a number of years.

	For 18 coating categories, the allowable VOC content limits will be decreased effective January 1, 2003. For one existing category, industrial maintenance coatings, the allowable VOC content limit will decrease effective January 4, 2004. Table I of this advisory lists the new and revised coating categories and the changes to VOC content limits.
Thinning	Restricts the addition of thinners so that the applicable VOC limit specified in the rule is not exceeded during application of any architectural coating.
Painting Practices	Requires architectural coatings, thinners, cleanup solvents, or other materials containing VOCs be stored in closed containers, when not in use, pursuant to existing Rule 67.17 – Storage of Materials Containing Volatile Organic Compounds.
Statewide Averaging Compliance Option	Allows architectural coating manufacturers on or after January 1, 2003, in lieu of compliance with the limits specified in Table I, to average the VOC content of designated architectural coatings such that their actual cumulative emissions are less than or equal to the cumulative emissions that would have been allowed under the rule. Averaging may be done over a compliance period not to exceed one year. The manufacturers must also comply with the averaging provisions in Appendix A of the rule. This averaging option ends on January 1, 2005.
Sell-Through of Coatings	Allows coatings manufactured prior to the January 1, 2003, or January 1, 2004, effective dates specified for the coatings to be sold, supplied, or offered for sale for up to three years after the specified effective date. In addition, a coating manufactured before the effective date specified for that coating in the rule may be applied at any time, both before and after the specified effective date, so long as the coating complied with the standards in effect at the time the coating was manufactured.
Administrative Requirements	Adds manufacturer-labeling requirements specifying information to be displayed on coating containers (or label) sold or distributed.

Reporting Requirements	Beginning in 2004, requires manufacturers to submit annual written reports to the Executive Officer of the California Air Resources Board on or before April 1 of each calendar year. These reports must disclose the number of gallons of specified architectural coatings sold in California during the preceding year along with the method used to calculate State sales and distribution.
Test Methods	Updates test methods for determining compliance and makes other minor corrections and clarifications to improve the rule.

A copy of Rule 67.0 is available by contacting the District at (858) 650-4700 or on the District's web site at www.sdapcd.co.san-diego.ca.us. For more information, please contact the District Compliance Division at (858) 650-4550.

Table I
New and Revised Rule 67.0 Coating Categories and VOC Content Limits¹

Coating Categories	New (N) or Existing (E) ²	Current Rule 67.0 (g/l)	Effective Upon Adoption (g/l)	Effective 1/1/2003 (g/l)	Effective 1/1/2004 (g/l)
Antenna Coatings	N	420	530		
Antifouling Coatings	N	420	400		
Bituminous Roof Coatings	N	300	300		
Bituminous Roof Primers	N	350	350		
Clear Wood Coatings:					
Clear Brushing Lacquer	N	680	680		
Lacquers	E	680	680	550	
Sanding Sealers	E	550	550	350	
Faux Finishing Coatings	N	350	350		
Fire Resistive Coatings	N	350	350		
Flat Coatings	N	250	250	100	
Floor Coatings	N	420	400	250	
Flow Coatings	N	420	420		
High Temperature Coatings	E	650	650	420	
Industrial Maintenance Coatings	E	420	420		250
Low-Solids Coatings ³	N	250	120		
Nonflat Coatings	N	250	250	150	
Nonflat Coatings – High Gloss	N	250	250		
Magnesite Cement Coatings	E	600	600	450	
Multi-Color Coatings	E	580	580	250	
Pre-Treatment Wash Primers	E	780	780	420	
Primers, Sealers, and Undercoaters	E	350	350	200	
Quick-Dry Enamels	E	400	400	250	
Quick-Dry Primers, Sealers, Undercoaters	E	525	525	200	
Recycled Coatings	N	250	250		
Roof Coatings	E	300	300	250	
Rust Preventative Coatings	N	420	400		
Specialty Primers, Sealers, and Undercoaters	N	350	350		
Stains	E	350	350	250	
Swimming Pool Coatings	E	650	650	340	
Swimming Pool Repair & Maintenance Coatings	E	650	650	340	
Temperature-Indicator Safety Coatings	N	650	550		
Traffic Marking Coatings	E	250	250	150	
Waterproofing Sealers	E	400	400	250	
Waterproofing Concrete/Masonry Sealers	N	400	400		
Wood Preservatives <i>(Below Ground Wood Preservative deleted)</i>	E	350 (600)	350		

1. VOC content limits expressed in grams VOC per liter of coating, as applied, less water and exempt compounds.

2. Coatings in newly added categories previously were regulated as general coatings with a VOC content limit of 250 gm/liter or were included in an existing specialty coating category.

3. VOC content limits expressed in grams of VOC per liter of coating, as applied, including water and exempt compounds.



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PHASE I ENHANCED VAPOR RECOVERY SYSTEM UPGRADE DEADLINE FOR UNDERGROUND GASOLINE STORAGE TANKS IS APRIL 1, 2005

On February 1, 2001, the California Air Resources Board adopted revisions to the gasoline vapor recovery certification procedures that specify vapor collection efficiency during gasoline delivery to underground storage tanks. These changes were part of implementation of the state's Enhanced Vapor Recovery (EVR) program. Since July 1, 2001, only Phase I vapor recovery systems that met the new EVR standards have been approved for installation in the State of California. Under state law, existing installations must soon be retrofitted with certified Phase I EVR systems.

Not later than April 1, 2005, all underground gasoline storage tanks (existing and new) must be equipped with a Phase I vapor recovery system certified to meet EVR standards.

Presently, the state has certified four Phase I EVR systems - Phil-Tite (Executive Order VR-101), OPW (Executive Order VR-102), EBW (Executive Order VR-103), and CNI (Executive Order VR-104). If your present Phase I vapor recovery system is not one of these four systems, it **must be replaced by April 1, 2005** with a certified Phase I EVR system. You must first obtain an Authority to Construct (A/C) from the San Diego County Air Pollution Control District prior to upgrading your vapor recovery system. Since lead times for approval and scheduling of upgrades may be lengthy, you should submit an application for a District Authority to Construct prior to November 1, 2004.

Should you have questions regarding the Phase I EVR retrofit requirement or the District's permit application process, please contact Mahiany Crisman at (858) 650-4597.

RGS:ap

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