



Air Pollution Control Board

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COMPLIANCE ADVISORY

NOTICE FOR RULES 67.11 AND 67.11.1 WOOD PRODUCTS COATING OPERATIONS NEW VOLATILE ORGANIC COMPOUNDS (VOC) LIMITS EFFECTIVE JULY 1, 2005

On August 13, 1997, the Air Pollution Control District adopted amendments to Rule 67.11-Wood Products Coating Operations. Rule 67.11 controls emissions of volatile organic compounds (VOC) from wood products coating operations. This rule is applicable to all wood coating operations, including refinishing operations, where 500 gallons or more of VOC containing materials, such as coatings and solvents, are used in a consecutive twelve-month period.

When Rule 67.11 was amended in 1997, it included future, more stringent, VOC content limits for several coating categories. On July 1, 2005, these new, more stringent VOC limits will become effective and will be enforced by the District. The new limits apply to all wood products coating operations subject to the standards of Rule 67.11, excluding refinishing operations. The new limits are listed below for your information.

In addition to Rule 67.11, wood coating operations with VOC emissions more than 25 tons per year are also subject to Rule 67.11.1-Large Coating Operations for Wood Products, which was adopted September 25, 2002, to fulfill federal requirements. Compliance with the new VOC content limits of Rule 67.11 ensures compliance with Rule 67.11.1 for those coating categories subject to the new limits.

The table below compares existing Rule 67.11 VOC content limits that are currently in effect, with new VOC limits that become effective July 1, 2005. All limits are expressed as grams of VOC per liter of coating (g/l) less water and exempt compounds, as applied.

OVER

CATEGORY	OLD VOC LIMIT, g/l	NEW VOC LIMIT, g/l (Effective July 1, 2005)
Clear Topcoat	680	275
High-Solid Stains	700	550
Medium Density Fiberboard (MDF) Coatings	680	550
Pigmented Coatings	600	275
Sealers	680	550
Low-Solids Stains, Toners, or Washcoats	700	480
All Non-categorized Coatings (Default Category)	420	275

As mentioned above, there are no VOC limit changes for **wood refinishing** operations when applied to post-consumer wood products in order to restore the post-consumer wood product to its original condition. A wood product from which coatings have been removed to repair flaws in initial coatings applications is not considered a refinished wood product coating operation.

Copies of Rule 67.11 can be obtained from the District's web page at:

<http://www.sdapcd.org/rules/rules/REG4.html>,

or you may call Luann Serbesku at (858) 650-4544. If you have questions concerning this advisory or believe you may have a problem complying with the new Rule 67.11 VOC limits, please contact Gary Hartnett of the Compliance Division at (858) 650-4553.

GMH/l
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