

Motor Vehicle and Mobile Equipment Refinishing Operations



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

Regulation 8, Rule 45

effective date Oct. 1, 2009

*Santa Clara County
Fire Chiefs Hazardous Materials
Subcommittee*

*Jeremy Kimball, Senior AQ Inspector
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New Requirements

- Low Volatile Organic Compound (VOC) coatings
- Low VOC surface prep solvents
- Prohibition of Possession
- Mobile refinisher registration
- NESHAPS 6H registration

Low VOC Coatings

- Topcoats (color coats) now most likely waterborne
- Look for two types of waste streams in most cases
- ***Shops cannot possess any non-compliant coatings after October 1, 2009.***

New VOC limits

Product	New VOC limit	Effective Date
Color Coatings	420 g/l (3.5 lbs/gal)	<i>October 1, 2009</i>
Specialty Coatings	250 g/l – 680 g/l (2.1-5.7 lbs/gal)	<i>October 1, 2009</i>
Underbody Coating	430 g/l (3.6 lbs/gal)	<i>October 1, 2009</i>
Uniform Finishing Coating	540 g/l (4.5 lbs/gal)	<i>October 1, 2009</i>
Truck Bed Liner Coating	310 g/l (2.6 lbs/gal)	<i>October 1, 2009</i>
Surface Preparation Solvent	25 g/l (0.20 lbs/gal)	<i>October 1, 2009</i>
Bug and Tar Remover	350 g/l (2.9 lbs/gal)	<i>October 1, 2009</i>
Adhesion Promoter	540 g/l (4.5 lbs/gal)	<i>January 1, 2010</i>
Primer Sealer	250 g/l (2.1 lbs/gal)	<i>January 1, 2010</i>
Single-Stage Coating	340 g/l (2.8 lbs/gal)	<i>January 1, 2010</i>
Any other Coating Type	250 g/l (2.1 lbs/gal)	<i>October 1, 2009</i>

Surface Prep Solvents

- VOC content for all surface preparation solvent is limited to 25 g/l (0.2 lbs/gal)
- New annual usage limits for bug and tar remover limit 350 g/l (2.9 lb/gal)
 - a. 20 gallons if 400 gal or more of coating
 - b. 15 gal if 150 gal or more of coating
 - c. 10 gal if less than 150 gal
- Clean up solvent (lacquer thinner) VOC limits have not changed.

Overview of Other Requirements

- Must have BAAQMD permit if spraying > 30 gallons of coating per year
- No Rule Exemption from 8-45—Only permit exemption per above
- Filtration when applying topcoats—anything on top of primer
- Logs of all coatings and sprayed and solvent used
- Use HVLP spray guns (high volume, low pressure or approved equivalent)
- Housekeeping: keep all rags, filters, paint sticks etc. in covered containers, **including waterbornes**
- Clean-up solvent VOC limits remain the same (lacquer thinner)
- It is **not** permissible to use lacquer thinner as a surface preparation solvent.

Red Flags

- Only one waste stream (though there are compliant solvent-borne color coats—Nason)
- No BAAQMD Permit To Operate—generally a sky blue 8.5 X 11 document
- No spraybooth
- Multiple Open Containers / Poor Housekeeping
- Old dusty and rusted paint cans

Mobile Refinisher Registration

- After October 1, 2009 ALL mobile refinishers must be registered with BAAQMD
- Mobile Coaters must have registration certificate available for inspections and for client's records
- Otherwise, same rule requirements as fixed body shops

Example of Acceptable Filtration



NESHAPS Subpart HHHHHH (6H)

- Registration required for stationary and mobile coating operators
- Compliance dates:
 - 1) Existing sources: January 10, 2011
 - 2) New sources: upon startup after January 9, 2008
- Registration forms available at:
<http://www.baaqmd.gov/~media/Files/Engineering/Forms/Permit%20Application/frmHHHHHH.ashx>
E-mail to Duncan Campbell at dcampbell@baaqmd.gov or
phone 415-749-4722

Contact Information

Air District website: www.baaqmd.gov

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