

# 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  
March 2, 2010*

# 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

<b>Product</b>	<b>New VOC limit</b>	<b>Effective Date</b>
Color Coatings	<b>420 g/l (3.5 lbs/gal)</b>	<i>October 1, 2009</i>
Specialty Coatings	<b>250 g/l – 680 g/l (2.1-5.7 lbs/gal)</b>	<i>October 1, 2009</i>
Underbody Coating	<b>430 g/l (3.6 lbs/gal)</b>	<i>October 1, 2009</i>
Uniform Finishing Coating	<b>540 g/l (4.5 lbs/gal)</b>	<i>October 1, 2009</i>
Truck Bed Liner Coating	<b>310 g/l (2.6 lbs/gal)</b>	<i>October 1, 2009</i>
Surface Preparation Solvent	<b>25 g/l (0.20 lbs/gal)</b>	<i>October 1, 2009</i>
Bug and Tar Remover	<b>350 g/l (2.9 lbs/gal)</b>	<i>October 1, 2009</i>
Adhesion Promoter	<b>540 g/l (4.5 lbs/gal)</b>	<i>January 1, 2010</i>
Primer Sealer	<b>250 g/l (2.1 lbs/gal)</b>	<i>January 1, 2010</i>
Single-Stage Coating	<b>340 g/l (2.8 lbs/gal)</b>	<i>January 1, 2010</i>
Any other Coating Type	<b>250 g/l (2.1 lbs/gal)</b>	<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](mailto:dcampbell@baaqmd.gov) or  
phone 415-749-4722

# Contact Information

Air District website: [www.baaqmd.gov](http://www.baaqmd.gov)

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Jeremy Kimball, Senior Inspector

[jkimball@baaqmd.gov](mailto:jkimball@baaqmd.gov)

415-760-6386