

COMPLIANCE ASSISTANCE BULLETIN

March 2009

(Revised) - Motor Vehicle and Mobile Equipment Coating Operations – Phase II – Rule 4612

On September 21, 2006, the San Joaquin Valley Air Pollution Control District adopted Rule 4612 – *Motor Vehicle and Mobile Equipment Coating Operations – Phase II*. The purpose of this rule is to limit emissions of Volatile Organic Compounds (VOC) associated with the coating of motor vehicles, mobile equipment, and associated parts and components. It also limits VOC emissions from organic solvent cleaning, storage, and disposal associated with such operations. The Rule is in effect as of January 1, 2009, replacing Rule 4602. This Bulletin is a basic summary of the requirements as they apply to coating of mobile vehicles and equipment. Failure to comply with the provisions of this rule would be a violation of District Rules and could subject the operator to significant civil or criminal penalties.

Definitions

- VOC: Tertiary butyl acetate (TBAC) and Methyl Formate (MF) will not be considered a VOC if used as an automotive coating component. Use of more than one gallon per year of TBAC or MF is subject to the requirements in Rule 1020- *Definitions*, as amended on January 15, 2009, and may require a Permit to Operate, or to be included on your current Permit to Operate.

Exemptions

- Sources using an emission control device with prior approval of the District are exempt from coating and solvent VOC limits and use of HVLP or other compliant coating application method.

Requirements

- Rule 4612 includes coating categories not previously included in prior rules. Previously exempt operations may need a Permit to Operate (i.e. truck bed lining operations). If your operation is now subject to permits based on usage of any of the coatings listed in Table 1, you must apply for a Permit to Operate immediately.
- Solvent cleaning activities are limited to a VOC content of 25 grams per liter (0.21 lb/gal). Bug and tar remover must meet the Consumer Products Regulation limit of 40% VOC by weight. The limits apply to all cleaning activities, including the cleaning of application coating equipment. Acetone may be used for equipment clean-up.
- For a gun permanently labeled HVLP by the manufacturer, the end user shall demonstrate that the gun meets HVLP standards. Satisfactory proof will either be in the form of manufacturer's published technical material **or** by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer to show that the gun is operational between 0.1 and 10 psig.
- For a gun **not** permanently labeled HVLP by the manufacturer, but operating as HVLP, satisfactory proof will be in the form of manufacturer's published technical material **and** by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer to show that the gun is operational between 0.1 & 10 psig.

- An inlet pressure gauge on a gun is not a substitute for an air pressure tip gauge.
- For other spray coating methods, written approval from the APCO shall be obtained prior to use for each alternative coating application method that is capable of achieving at least 65 percent transfer efficiency. The approval and all equipment specified in the approval must be kept with these guns.
- Suppliers and applicators should be aware that there is no provision for “sell through” or use of any non-compliant coatings remaining in inventory after the compliance date. All non-compliant paint must be removed from the premises.
- Labeling requirements of Section 6.2 shall not apply to any coating manufactured prior to July 1, 2008, provided the coating is compliant with the Rule and the relevant date of manufacture can be determined and is provided to the District upon request.
- There are no provisions for Specialty Coatings in Rule 4612.

Table 1 - VOC Content Limits for Coatings

Coating Category	VOC Regulatory Limit, as applied, in grams/liter (pounds per gallon)	
	Effective on and after 1/1/2009 *	Effective on and after 1/1/2010
Adhesion Promoter	840 (7.0)	540 (4.5)
Clear Coating	250 (2.1)	
Color Coating	420 (3.5)	
Multi-Color Coating	680 (5.7)	
Pretreatment Coating	660 (5.5)	
Primer	250 (2.1)	
Primer Sealer	420 (3.5)	250 (2.1)
Single-Stage Coating	420 (3.5)	340 (2.8)
Temporary Protective Coating	60 (0.5)	
Truck Bed Liner Coating	310 (2.6)	
Underbody Coating	430 (3.6)	
Uniform Finish Coating	540 (4.5)	
Any other coating type	250 (2.1)	

* The specified limits remain in effect unless revised limits are listed in the subsequent column.

Multi-stage coatings are no longer calculated as a sum of the components used. Coatings must meet the applicable VOC limit based on coating category.

Permit Services will administratively change existing Permits to Operate to reflect the new requirements. You will receive the updated permit reflecting the rule changes. Please note that, while Rule 4612 does not require you to maintain daily paint usage records, other District Rules do and the administratively changed Permits to Operate will continue to require daily record keeping to demonstrate compliance with daily VOC emission limits.

Rule 4612 may affect your operation in ways not mentioned in this Bulletin. Please call the District’s Small Business Assistance at the telephone numbers below for help in determining how the Rule affects your facility. You may also consult the full text of the Rule at the following link www.valleyair.org. To assist with record keeping requirements, forms can be obtained from the Air District’s website: http://valleyair.org/busind/comply/compliance_forms.htm.