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## **SURFACE COATING OF METAL PARTS & PRODUCTS: HOW TO AVOID COSTLY VIOLATIONS**

On November 19, 1985, the Ventura County Air Pollution Control Board adopted District Rule 74.12, Surface Coating of Metal Parts and Products. Rule 74.12 has been revised several times since that date. Since the adoption of Rule 74.12, District Compliance personnel have issued numerous Notices of Violations (NOVs) to regulated facilities for a variety of violations.

The purpose of this advisory is to help metal parts coaters stay in compliance with Rule 74.12, and to help them avoid future violations and costly penalties. Below is a list of common Rule 74.12 violations observed by District Inspectors and how to avoid them:

**Transfer Efficiency.** Rule 74.12 requires that metal coating operations meet strict transfer efficiency requirements. Many painters use HVLP spray guns to meet those requirements. A properly operated HVLP spray gun must be operated with no more than 10 PSI air pressure at the air cap. Most manufacturers specify a maximum air pressure setting at the spray gun air inlet in order to comply with the 10 PSI air cap pressure limit. The maximum inlet air pressure is either stamped on the spray gun body, near the air inlet, or it can be found in the manufacturer's instruction manual.

**Coating ROC Content Too High.** Be sure to familiarize yourself with the reactive organic compound (ROC) limits for your specific coating categories. Make sure that your painters mix coatings according to the manufacturer's instructions. Suppliers and manufacturers can supply you with ROC information for all coatings they sell.

**Surface Prep Solvent.** Rule 74.12, limits the ROC content of surface prep solvents to no more than 25 grams per liter (g/l). This limit also includes aerosol cans and "wipes". Surface prep means the use of ROC containing solvents for removing dust, grease, and other contaminants from a surface before you paint or prime it. Be sure to inform your supplier that you are ordering products for surface prep use *in Ventura County*. Other areas in California may have different requirements than Ventura County.

**Open Containers of ROC Containing Materials.** This is the most easily avoidable violation our Inspectors find in the field. Make sure that all paint, primer, hardener, reducer and solvent containers are closed when not in use. Even "water based" paint and primers contain ROCs, and have to be covered when not in use. "In use" means something you are using *right now*, not something you used a few hours ago.

**Cleanup Solvent.** Rule 74.12, limits the ROC content of cleanup solvents to no more than 25 grams per liter (g/l). "Cleanup" means the removal of uncured coatings from any surface.

A copy of APCD Rule 74.12 may be obtained from the District's web site at [www.vcapcd.org](http://www.vcapcd.org).

If you have any questions regarding APCD Rule 74.12, or need additional information, contact Eric Wetherbee, Compliance Supervisor at (805) 645 – 1496 or [eric@vcapcd.org](mailto:eric@vcapcd.org).