



AUTO REFINISHING: HOW TO AVOID COSTLY VIOLATIONS

On January 28, 1992, the Ventura County Air Pollution Control Board adopted District Rule 74.18, Motor Vehicle and Mobile Equipment Coating Operations. Since the adoption of Rule 74.18, 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 auto refinishers stay in compliance with Rule 74.18, and to help them avoid future violations and costly penalties. Below is a list of common Rule 74.18 violations observed by District Inspectors and how to avoid them:

Open Containers of ROC Containing Materials. This is, by far, the most common and 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 reactive organic compounds (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.

Cleaning Operations. Rule 74.18, limits the ROC content of cleaning solvents to no more than 25 grams per liter (g/l). “Cleaning Operations” means the removal of uncured adhesives, inks or coatings, or other contaminants from motor vehicles, mobile equipment, associated parts and components, tools, machinery, equipment, or general work areas. Cleaning operations include surface preparation and spray gun cleaning.

Spray Booth Maintenance. Your spray booth must be equipped with a working manometer, filled to the proper level with fluid. All of the overspray filters must be in good condition and in place on the spray booth exhaust. Also, make sure that there are no gaps in the filters. All painting must be done inside a spray booth, with a few very limited exceptions.

Coating ROC Content Too High. Be sure to inform your supplier exactly how any coatings you buy will be used. Make sure that your painters mix coatings according to the manufacturer’s instructions. Most manufacturers can supply you with wall charts that show, by category, which coatings and cleaners are legal in Ventura County.

Transfer Efficiency. Rule 74.18 requires that auto refinishers meet strict transfer efficiency requirements. Most refinishers 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.

Recordkeeping. Rule 74.18 requires auto refinishers to keep a list of all coatings and clean up solvents that are used. You are also required to keep monthly records of coatings and cleaning solvents purchased and records of cleaning solvent disposed of.

A copy of APCD Rule 74.18 may be obtained from the District's web site at www.vcapcd.org.

If you have any questions regarding APCD Rule 74.18, or need additional information, contact Dan Searcy at 805/645-1494 or email at dans@vcapcd.org.