



MOBILE AUTOMOTIVE TOUCH-UP COATING OPERATIONS: A TOUCH UP GUN IS NOT AN AIR BRUSH

This advisory is to help mobile auto refinishers to stay in compliance with APCD permit requirements and Rule 74.18, in order to avoid violations and costly penalties.

In 1992, the Ventura County Air Pollution Control Board adopted District Rule 74.18, Motor Vehicle and Mobile Equipment Coating Operations. Pursuant to Rule 74.18, mobile auto touch up operations are exempt from the transfer efficiency requirements and the paint spray booth requirements, provided the paint application is done using only a paint brush or an air brush with a cup that holds no more than 4 ounces of paint.

APCD Rule 23 exempts from permit, the application of coatings used in mobile automotive touch up operations where application is done using either a paint brush or an air brush with a cup that holds no more than 4 ounces of paint.

Please note that mini spray guns or touch up guns do not qualify for either of the above mentioned exemptions. A mini spray gun or touch up gun is not an air brush. (See the reverse side of this advisory for examples of typical air brushes and touch up guns.) **Also, spray painting outside of an approved auto paint spray booth can result in overspray on nearby vehicles and a public nuisance violation for the operator.** Also note that the District cannot issue a Permit to Operate for mobile automotive touch up operations where a mini spray gun or a touch up gun will be used.

District enforcement staff has observed that many mobile automotive touch up operations are being performed using small “touch up” *spray guns* and not paint brushes or air brushes. This is either due to misunderstanding APCD Rules and Regulations, being misinformed, or is done in an effort to circumvent the requirements of Rule 74.18 and permit requirements.

Effective immediately, the District will issue a Notice of Violation (NOV) to any operator found in violation and monetary penalties will be sought. If District inspectors observe mobile automotive touch up operations where painting is occurring using anything other than a paint brush or an air brush, they will issue an NOV. The California Health and Safety Code allows penalties of up to \$1,000 per day for each day of violation.

Additionally, District inspectors will issue an NOV for Public Nuisance (California Health & Safety Code Section 41700), should the mobile painting operations result in property damage from overspray, or a sufficient number of citizen complaints.

For the complete requirements and limitations, please refer to Ventura County APCD Rule 74.18. You may download a copy of Rule 74.18 at www.vcapcd.org.

If you have any questions regarding APCD Rule 74.18, the District’s auto body refinishing compliance program, or need additional information please contact Dan Searcy at 805/645-1494 or email at dans@vcapcd.org.



Above and Right - Typical airbrushes

Below - Typical "Touch Up Guns, or Mini Spray Guns. Gravity feed style on the left and siphon feed style on the right

