AIR POLLUTION CONTROL DISTRICT
REGULATORY COMPLIANCE DIVISION

POLICIES AND PROCEDURES

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Topic: Surface Coating of Motor Vehicles and Mobile Equipment

Distribution: All Policy Holders

This policy and procedure document provides guidance for conducting compliance inspections of surface coating operations subject to Rule 339 (Motor Vehicle and Mobile Equipment Coating Operations).

RULE 339

Any permitted facility that is engaged in the coating of vehicles regulated by Rule 339 is subject to the provisions and requirements of this rule. The requirements not subject to this rule are outlined in Section B.1 (Exemptions).

PROCESS DESCRIPTION

The application of coatings requires several steps in achieving a good quality paint job. The vehicle surface undergoes several sanding and coating steps depending on the body material (metal or plastic), the blending required for color matching and the topcoat system (single and clearcoat/basecoat systems) used. Emissions of ROCs occur during the vehicle preparation, coating application, and equipment cleanup.

Vehicle preparation is generally performed in two stages. First, the surface is washed thoroughly with detergent and water to remove dirt and water soluble contaminants, and is allowed to dry. Then the surface is cleaned with a solvent to remove wax, grease, and other contaminants. The area to be refinished is sanded to remove old paint. Alternately the surface may be chemically treated to remove the old finish.

After the surface has been thoroughly sanded and cleaned, it may be treated with one or more type of "undercoat." There are four basic types of undercoats: Precoats, pretreatment wash primers, primer/primer surfacer, and primer sealers.

Precoats provide adhesion to the bare surface and produce a corrosion resistant foundation. Because precoats are typically high in solid content, they can be used for surface building like primer surfacers, which is not consistent with the precoat definition. To qualify as a precoat, the coating must be followed by a water-based primer. To deter use of precoats as primer surfacers, Rule 339.D.9 limits precoat usage to 25% of the total quantity of primer used. Compliance with this provision is typically based on monthly purchase records.

Pretreatment wash primers contain 0.5% by weight of acid for etching bare metal to enhance corrosion resistance.

A primer/primer surfacer is a high solids primer providing adhesion, corrosion protection, and build up. The solids fill in small imperfections in the substrate, and are usually sanded after application.

A primer sealer is an undercoat, which provides a transition coat. Sealing is necessary to prevent bleeding of the subsequent topcoat into the primer coat. Primer sealers are formulated with resins, which seal the old surface, thereby preventing solvents in topcoats from penetrating. Others promote adhesion through chemical reaction (solvent binding) of a subsequent topcoat.

Topcoats are generally a series of coating layers applied over primers that determine the final color of the finished surface. Since most repairs are spots and panel repair, the first coat is applied to the immediate area being repaired, with subsequent coatings extending beyond this area.

ROC Content Limits

Most coatings are composed of two to three ROC containing products, (i.e., paint + catalyst + reducer/thinner) while a few coatings are ready-to-spray (RTS) right out of the container (i.e., primers and primer surfacers). The coatings subject to Rule 339 must comply on an as applied basis rather than the ROC content of an individual component used. Compliance with ROC limits shall be based on records maintained by the facility. In the event that a coating contains no catalyst, a sample may be procured (consistent with Policy Number III.C) to verify compliance with applicable limits.

Coatings not subject to this rule include rubberized undercoating (for protection of the vehicle's undercarriage) and liquid masking coatings, which are used in lieu of paper or plastic masking of areas not to be coated.

Spray Booths

Most coating operations are required to be conducted inside the booth, the booth controls particulate matter emitted during spraying operations. ROC emissions are not controlled unless additional equipment is installed and in operation, such as a carbon absorber, incinerator, or a thermal oxidizer. Coatings activities, which are listed in sections B.3 and B.4, are not required to, applied in a spray booth.

For the purpose of compliance with Rule 339, prep stations are to be considered as spray booths. Prep stations are defined as any area that meets the requirements for a "Limited Spraying Area" from section 45.207 of the uniform fire code and that prevents the escape to the atmosphere of overspray particulate using properly maintained filters and positive mechanical ventilation. Per the "Limited Spraying Area" definition, the maximum allowable area to be coated in a prep station is nine (9) square feet per vehicle. Any observation of a shop applying topcoat to an area exceeding 9 square feet in a prep station should be documented as a violation of section D.2, since the activity does not meet the definition of a prep station. The violation may also be referred to the local fire agency for enforcement of the Fire Code provision.

Transfer Efficiency

Application methods must achieve a 65% transfer efficiency or greater when applying coatings subject to Rule 339. The coating application apparatus most commonly used is the High Volume Low-Pressure (HVLP) spray gun.

The HVLP gun applies more paint onto the surface of the vehicle while reducing overspray or "bounce back" of the atomized coatings from the gun. Definition C. 17 describes HVLP guns as spray equipment used to apply coatings with a volume of air delivered at pressures between 0.1 and 10 psig air pressure, measured at center of the tip. (See section 7.A of "Inspection Procedures" for compliance determination of HVLP guns.)

Other common application methods which meet transfer efficiency requirements are listed in section C. 15 (Hand Application Methods), which includes air brush and paint brushes. Coating applications utilizing hand application methods, typically for the purpose of graphic lettering or striping and touch-up, are not required to be performed within a spray booth, per sections B.4.b and B.4.c. Detail HVLP spray equipment are also compliant for application of touch-up coatings outside of a spray booth.

Surface Preparation and Cleanup Solvents

1. ROC containing materials such as cloth or paper sued for surface preparation and cleanup must be ɔt in non-absorbent closed containers. Several of these containers are usually kept on site at most auto ɔody facilities.

2. An enclosed gun washer with tight fitting covers must be used at all facilities, which are subject to Rule 339 section D. One alternative gun washer approved for use in Santa Barbara County is the Safety Kleen

Model #1 107 (SCAQMD General Test Method for Determining Solvent Losses from Spray Gun Cleaning, Dated: 10-03-89).

NOTE: While no limit has been placed on the ROC content of the solvent used in the gun washer, significant emission reductions have been realized through the recycling of the solvents used.

3. ROC containing materials used for surface preparation shall not exceed 1.67 lbs/gal of ROC content or 200 grams/liter prior to coating of surfaces. This provision does not limit the ROC of solvents used to clean road tar, wax, and grime off the vehicle prior to sanding the surfaces.

EMISSIONS

Potential emission points at auto body shops include:

1. Coating and solvent storage
2. Spray gun washing operations
3. Spray booth exhaust stack
4. Sanding and surface preparation of vehicles prior to painting
5. Spray guns during application outside of booth
6. Storage of waste material

INSPECTION PROCEDURE

The inspector should use the following procedures when conducting an inspection of an auto body shop:

1. File review

   A. Review past inspection reports, enforcement actions, and recent correspondence and make note of any recent complaints attributed to the facility.

   B. Review the most recent annual report received. Using total reported annual emissions, determine compliance with facility's annual emission limit. Divide the highest month's emissions by 174 hours per month to determine compliance with the facility's hourly emission limit. A figure greater than 174 hours per month may be used only if RCD has verified the enhanced operating schedule.

2. Checklist Preparation (ENF-68 attached)

   A. Use ENF-68 (SBCAPCD Autobody Shop Inspection Report) to make notes during the file review and to document the facility inspection by filling in the appropriate sections of the checklist.

   B. Review permit and conditions.

   C. ENF-68 Section 1, EQUIPMENT DESCRIPTION (ENF-68), should be filled out during the inspection confirming the equipment described on the permit. This section should primarily include the number of spray booths at the facility.

   D. Section 2, COMPLIANCE EVALUATION (ENF-68). Part A of this section shall be completed during the inspection based on compliance determination with hourly emission limit. Part B is specific to annual report.

   E. Section 3, APPLICABLE RULES (ENF-68), are the prohibitory rules that pertain to the facility to be inspected. For most facilities, these consist of Rules 302 (Visible Emission), 303 (Nuisance), and 339.

3. Access - Upon arrival at the facility, obtain access to the facility following procedures outlined in RCD P&P I.B (Access) and RCD P&P I.B. I (The Unannounced Inspection).

4. Pre-inspection - Conduct a pre-inspection interview with the facility operator:

   A. Verify facility name, current operator's name (s), PTO number(s), and availability.

   B. Discuss PTO conditions including submittal of the facility's annual reports (if the inspection is conducted during the first quarter period).

   C. Discuss Rule 339 and indicate the various provisions of the rule that will be covered during the inspection and how compliance is determined.

   D. Identify other processes at facility and determine whether spray booth (s) are rented to outside users. Complete Section 4 (OTHER PROCESSES) of ENF-68.

   E. Request and review all facility records that are required by Section F of Rule 339. Verify that all information required by Rule 339.F are being maintained. Complete Section 5 (RECORDKEEPING) of ENF-68.

5. Review Monthly Summary - Review current year's monthly emission summary, required by Rule 339.F.4. If the facility rents its spray booth, ensure that the summary includes rental emissions. Divide highest month's emissions by 174 hours per month. Complete subsections A-C of section 6 (COMLIANCE WITH PERMITTED EMISSION LIMITS) of the inspection checklist.

   NOTE: While Rule 339.F.I requires ROC content values to be less water and exempt solvents, reported emissions pursuant to Rule 339.F.4 may be based on ROC content including water and exempt solvents.

6. Review Purchase Records - Review current year material purchase records, required by Rule 339.F.3., and:

   A) confirm that materials purchased are consistent with those on the facility's "As-Applied Listing" which is required by Rule 339.F.I. **NOTE: Complete daily coating and monthly solvent records maintained in lieu of a listing satisfies the requirements of section F.1.**

   B) assess compliance with Rule 339.D.9 (Precoat Limitation) by determining whether quantity of precoat of precoat purchase exceeds 25% of the quantity of primer purchased, on a monthly basis, (for compliance with this provision, at least three months of records should be reviewed);

   C) check for appropriate purchases of component(s) required to bring a coating into compliance, where the coating is otherwise usable and non-compliant without said component(s).

   D) request to see monthly statements associated with all inspected purchase records, to verify that all purchase inspected purchase records, to verify that all purchase records were provided. Ask the operator whether there are any cash invoices not reflected on the statement.

Complete section 7.A (COMPLIANCE WITH RULE 339 REQUIREMENTS) of ENF-68.

7. Conduct Shop Inspection, as follows:

IMPORTANT SAFETY NOTE: APCD policy requires all inspectors to have an approved, fit-tested respirator available at all times during the shop inspection. Inspectors shall don the respirator at all times when the potential exists for exposure to paint or solvent vapors and/or overspray.

A) Request to observe and inspect all spray equipment. Spray guns may be located in the coating mixing area, gun washer, spray booths, or in the personal storage area of painters and body repair workers. Ensure that all spray guns, etc., satisfy the requirements of Rule 339.D.7 (TRANSFER EFFICIENCY). If possible, measure the air pressure of the guns at the nozzle tip using a pressure gauge. Complete section 7.B of ENF-68.

NOTE: HVLP spray guns - Compliance can be determined by:

1. A pressure gauge supplied by or recommended by the manufacturer may be used to measure the operating pressure at the nozzle within the range of 0.01 to 10.0 psig.

2. Determination that the gun is operated as recommended in the manufacturer's manual and that the manual indicates that the standard operating pressure at the nozzle is less than 10 psig. A manufacturer's operating manual indicating operating procedures can assist in final determinations. Opposing orifices surrounding the outlet on the nozzle cap are about 1/8" larger than conventional spray gun caps.

B) Inspect the coating and solvent storage area. Using the facility's "As-Applied Listing," inspect the coating and solvent inventory to ensure that the inventory is consistent with the listing. Note to the operator any ROC-containing materials in inventory which are not on the listing, as well as potentially non-compliant materials in stock which were not noted on inspected purchase records. Determine whether all ROC-containing materials are stored in closed containers, as required by Rule 339.D. 10.

C) Request to inspect all spray booths not currently in use. Booths shall be inspected from the inside with all exterior doors closed and exhaust fan in operation, as follows: Place an 8.5" x 11" sheet of paper in front of the exhaust filters. Sufficient draw of air through the filters will cause the paper to be drawn against each tested filter. If the paper fails to cling to the filters, the filters are too clogged to allow proper airflow out the booth.

NOTE: If coating operations are being conducted within the permitted booth during the inspection, a visible emission evaluation should be conducted on the exhaust stack(s) of the permitted booth and recorded on ENF-16 (Visible Emissions Evaluation Record). Attach ENF-16 to the inspection report.

D) Determine compliance with any processes subject to the exemptions from the spray booth requirement. Rule 339.B.3.b exempts the use of a booth if an undercoat is being sprayed on less than 16 square feet of the vehicle and the undercoat contains no lead or chromium compounds. "Undercoat" is defined in Rule 339 as any pretreatment wash primer, precoat, primer, primer surfacer or primer sealer. No other coating types may be applied in any quantities outside of the booth. unless such activities are exempt per Rule 339.B.2-B.4.

NOTE: Rule 339, Provision B, Section 2 requires approval by the Air Pollution Control Officer, prior to spraying outside the permitted booth if the vehicle(s) does not fit within the booth.

E) Inspect coating materials and waste storage area. During inspection of the coating and solvent storage area (an area typically associated with paint mixing), check to see that all containers not in use are closed (339.D. 10). Also determine whether vessels containing waste coating and solvent and solvent laden rags are closed (339.D.8.a).

Regarding proper disposal of hazardous waste materials, ask to review the latest Hazardous Waste Manifest of materials removed from the facility. Portions of this section require circling answers while others need a verbal reply from the operator.

F) Inspect gun washing unit(s). If an enclosed system gun washer is use (Rule 339, Provision D, Section 8.b), request a demonstration to observe if the cleaning chamber is totally enclosed during the cleaning cycle. During the cleaning cycle slowly lift the closed cover; the unit should automatically shutoff. This is an industry safety standard built into these gun washers. The only other approved alternative gun washer is the Safety Kleen, Model #1107. To avoid spray gun contamination from use of single reservoir gun washers, operators may conduct pre- and final-rinse gun cleaning by introducing a small amount of solvent into the gun cup and spraying with a non-atomized stream into a sealable container. The shop should be advised, however, that the bulk of the gun cleaning must be performed by the enclosed machine.

8. Inspector Comments - section 10 of the checklist can be utilized to document any non-compliant situation. It also may be utilized to inform APCD Engineering Division of information pertinent to the permitting process. The overall condition of the facility should also be noted.

COMPLIANCE REQUIREMENTS OF OTHER PROVISIONS IN RULE 339

1. Rule 339.D.6 requires labeling on containers giving the ROC content of a particular product. If the ROC content cannot be determined, ask for specification sheets (which must be kept on site for each product) to confirm ROC data.

2. Rule 339.D.11 prohibits any person to specify or solicit the use of a coating on a Group I or II vehicle if such use or application results in a violation of the provisions of Rule 339. This section should be mentioned during the interview with shop personnel. If inventory of ROC containing materials results in finding non-compliant coatings, determine if the coating is being used and whether usage is being logged.

3. Rule 339.D. 12 prohibits the sale or offering for sale of any coating within the District that is not in compliance with the provisions of Rule 339. This section is applicable to the sale of any coating to applied at any location within the county. If a non-compliant coating has been found and is being used at a facility, an inquiry should be made as to whom supplied the coating(s). Both the user and the supplier are subject to this regulation.

DOCUMENTATION

Completed from ENF-68 (which follows this section of the P&P) will serve as the inspection report, which documents the inspection. In the event where a violation is observed, documentation of the violation shall be performed consistent with the procedures outlined in Policy Number VII.A, Notice of Violation. Any commercial shop determined to be operating without a required APCD permit shall be issued an NOV for Rule 20 1; to comply with such an NOV, the shop must obtain a permit and subsequently demonstrate compliance with Rule 339. A non-commercial shop, which does not appear to be outfitted to operate under permit, shall be issued an NOV for Rule 339 for non-compliance with any provisions of the rule.

FID#_____
PERMIT TYPE:
ATC# _____
PTO# _____

SANTA BARBARA COUNTY
AIR POLLUTION CONTROL DISTRICT
AUTOBODY SHOP
INSPECTION REPORT

DATE:_____
TIME IN:_____
TIME OUT:_____
SUP. OK:_____

CO./AGENCY: _____

LOCATION: _____ PHONE: ( ) _____

MAILING: _____ ZIP: _____

CONTACT: _____ TITLE: _____

ACCESS GRANTED: Y / N BY WHOM/TITLE: _____

INSPECTOR: _____ DATE OF LAST INSPECTION: _____

INSPECTION TYPE: Routine ___ SCDP ___ Reinsp ___ Other _____

IN COMPLIANCE? Y / N NOV/AIDoc#_____ Rule(s) violated:_____

Equipment found as described in permit? Y / N If no, describe in comments section.

Engineering Division, see comments: Y / N

1. EQUIPMENT DESCRIPTION:

_____

_____

2. COMPLIANCE EVALUATION

A. Emission Limits (Condition ___) ___ lbs/hr ___ TPY In compliance Y / N

See Sections 6.A and 2.B for more details on compliance with the emission limits.

B. Annual Report Calendar year: ____ Date submitted _____

Enforcement action if late NOV/AIDoc # _____ Total annual emissions (TPY) _____

3. APPLICABLE RULES:

302: In compliance Y / N If no, see comments _____

303: In compliance Y / N If no, see comments _____

339: In compliance Y / N If no, see Section _____

OTHER: _____

4. IDENTIFICATION OF ANY PROCESSES OTHER THAN AUTO PAINTING:

A. Metal coating (Subject to Rule 330) Y / N
If Yes, In compliance Y / N If No, see comments Y / N

B. Mobile equipment (Subject to Rule 339) Y / N

C. Polyester resin (Subject to Rule 349) Y / N
If Yes, In compliance Y / N If No, see comments Y / N

D. Other processes (explain) _____

E. Rental of spray booth (discuss tracking of rental emissions with operator) Y / N

If yes, rental emissions tracked Y / N (Rule 339.F.4)

5. RECORDKEEPING

		Maintained	In Compliance
A.	Current as-applied listing (Sect. F.1)	Y/N	Y/N
B.	Daily coating and monthly solvent logs	Y/N	Y/N
C.	Air qual/mfg spec sheets &/or MSDSs (Sect.F.2)	Y/N	Y/N
D.	Purchase records maintained (Sect. F.3)	Y/N	Y/N
E.	Monthly record of total ROC emissions (Sect. F.4)	Y/N	Y/N
F.	Permit posted or available (Rule 201.E)	Y/N	

6. COMPLIANCE WITH PERMITTED EMISSION LIMITS

A. Facility operation schedule: _____ hrs/day _____ days/wk
Notes: multiply hrs/day times days/wk times 4.35 wk/month to obtain hrs/month. If the result is > 174 hrs/month, use the actual hrs/month figure in calculating the average hourly ROC emissions (Section 6.C)

B. Maximum monthly ROC emissions (lbs/month): _____

Month, Year _____

C. Maximum average ROC emissions (lb/hour)*: _____

*(ROCs for highest month/174 hrs. If actual operating schedule > 174, use actual monthly operating schedule specified in section A above.)

PTO emission limit (lb/hr) _____ In compliance Y / N

D. Annual ROC emissions (TPY): _____

PTO emission limit (TPY) _____ In compliance Y / N

7. COMPLIANCE WITH RULE 339 REQUIREMENTS

A. ROC Limits

1. Coatings on listing in compliance with applicable ROC limits (Sect. D.1.a and D.1.b) Y / N

2. Material inventory consistent with listing Y / N

3. Does precoat use exceed 25% of primer use (Sect. D.9) Y / N See comments Y / N

B. Transfer efficiency technology & method of application (Sect. D.7)

1. High volume low pressure gun used Y / N
   Pressure in psig _____

2. Number of guns: Primer _____ Other Coatings _____

C. Substrate preparation (Sect. D.8)

1. Wax & grease remover (prior to sanding) - Name/Stock I.D. _____ / _____ ROC content._____
   Evidence of use after sanding Y / N

2. Surface preparation material - Name/Stock I.D. _____
   _____ / _____ ROC Cont._____ (ROC Limit: 1.67 lbs/gal or 200 grams/liter - Sect. D.8.c)

D. Filtered Exhaust Enclosure (Sect. D.2)

1. Filters in place Y / N
2. Filters in good condition Y / N
3. Type of filter medium _____
4. Exhaust fan operational Y / N
5. Fan power has sufficient draw Y / N
6. Evidence of overspray outside Y / N
7. All coating (excluding touch-up and hand application of lettering and striping) done within enclosure Y / N
   If yes, go to item 8. If no, continue below.
   a. Were the undercoatings used free of lead and chromium compounds and was the coating operation limited to one major panel per vehicle, or equivalent area, not exceeding an aggregate of 16 ft^2 Y / N
   b. Did operator coat the engine compartment and mating assemblies of engine and suspension components where such components were replaced in the engine compartment Y / N

c. Were items coated that cannot fit in booth Y / N

d. If yes to item 7.c, did the APCD grant a petition since last inspection Y / N If yes, date(s) granted:

_____

8. MATERIALS AND WASTE STORAGE:

A. All materials stored in sealed containers (Sect. D.10) Y / N

B. All ROC containing cloth/paper material materials stored in sealed containers (Sect. D.8.a) Y / N

C. ROC Containing Waste Reclaimed on Site Y / N
If yes, amount of solvent reclaimed (gals/month) _____

D. ROC Containing Wastes Hauled Away Y / N
If yes, last hazardous waste manifest number _____
Amount of waste removed (gals/hauling) _____
Was this amount used in calculating monthly emissions Y / N

9. GUN WASHERS: (Section D.8.b)

Enclosed Y / N	Name/Model #	Solvent Type
_____	_____ / _____	_____
_____	_____ / _____	_____
Other equipment:	_____	_____
	_____	_____
	_____	_____

10. COMMENTS:

_____

_____

_____

_____

_____

_____

_____

_____

Santa Barbara County Air Pollution Control District

Our Vision: Clean Air

PTO ANNUAL REPORT AND AIR TOXICS INFORMATION
MOTOR VEHICLE REFURBISHING FACILITIES

Facility Name:_____ Contact Person (Owner/Operator):_____

Street Address:_____ City:_____ State:_____ Zip:_____

Phone #:(_____)_____ Permit PTO/ATC (circle one) #:_____ Operating Schedule for:_____ (Year)

Hours/Day:_____ Days/Week:_____ Weeks/Year: _____

See back for air toxics reporting requirements and further instructions.

Please check your permit (under reporting requirements) for any other information that is required to be submitted with this report. Indicate total amounts (gallons) of substances used, listing additional materials and usage information on a separate sheet.

MONTH	COL.1 Gross ROC Emissions (lbs) *1	COL. 2 Waste Hauled Off Site (gals) *2	COL.3 ROC content of Waste (lbs/gal) *3	COL.4 Credit for ROC of Waste *4 Col.2 x Col.3 (lbs)	COL.5 Net ROC Emissions *5 Col.1 - Col.4 (lbs)
January			5 lbs./gal		
February			5 lbs./gal		
March			5 lbs./gal		
April			5 lbs./gal		
May			5 lbs./gal		
June			5 lbs./gal		
July			5 lbs./gal		
August			5 lbs./gal		
September			5 lbs./gal		
October			5 lbs./gal		
November			5 lbs./gal		
December			5 lbs./gal		
TOTAL					

1. Gross ROC emissions can be determined from purchase records or daily coating logs.
2. Waste hauled off site must be supported by waste manifests. This column is optional if a facility does not want to take credit for the ROC in waste hauled off site.
3. The ROC content of the waste is assumed by the APCD to be 5.0 lbs/gal. This column is also optional.
4. Credit for ROC of waste is determined by multiplying Column 2 by Column 3.
5. Net emissions are derived by subtracting Column 4 from Column 1.

I certify that the above and/or attached information is true to the best of my knowledge.

_____ _____

Signature Print name/date

PLEASE RETURN TO: APCD, RCD DIVISION, P.O. BOX 8120, GOLETA, CA 93118

INF-80 (5/96)

Annual Reporting and Air Toxics Instructions
Motor Vehicle Refurbishing Facilities

Annual Report Instructions:

On the front of this form is the annual reporting form required to be submitted to the APCD by March 1st of the year following the reporting year to be detailed. Transpose monthly emissions data from the APCD-105 "Monthly Facility Emissions" form (same as ENF-105) which you have been using to track your emissions on a monthly basis.

or

You can write your shop's name and reporting year (1994) on each of the APCD-105 forms (same as ENF-105) and submit copies of the monthly forms to the APCD. Don't forget to make a copy of the report for your records!

NOTE: ADDITIONAL REPORTING REQUIREMENTS BELOW

Air Toxics Reporting Requirements

Submit the following information to the APCD by March 1 for the previous calendar year in order to fulfill the Air Toxics "Hot Spots" Program (AB 2588) requirements.

1. Submit one copy of your listing of as-applied ROC-containing materials used at your facility. If you use a generic listing, please highlight the specific materials/formulations used in your shop;

   or

2. Submit one copy of your "Surface Prep and Clean-up Solvent Log," for the busiest month of the annual report you are submitting. Additionally, please submit one copy of all entries into your "Daily Coating Operations Logs," for the busiest week of the annual report year you are submitting.

NOTE: These copies must be attached to this annual reporting form and submitted to APCD as part of the facility's annual report.

APCD staff will use the above information to prepare your facility industry-wide inventory for the Air Toxics "Hot Spots" Program.

SAMPLE LISTING

As-Applied VOC Containing materials used at this facility. Updated :

Material Type	Brand Name	Material Stock I.D.	Catlayst I.D.	Reducer I.D.	Mix Ratio			Max.VOC as applied	Max. VOC Multi- Stage System	Application Method	Specific Use Instructions
					B	C	R				
Topcoat	DuPont	Imron 5000	193S		3	1		3.5		HVLP	Group I or Group II vehicles
Topcoat	DuPont	ChromaOne H.S.	7006S	7012S,7065S, 7075S,7085S,	3	1	%	3.5		HVLP	Same as Above
Topcoat	DuPont	Centari 5000	795S		3	1		3.5		HVLP	Same as Above
Basecoat	DuPont	Chromabase or Chromaprem		7160S, 7175S 7185S, 7195S	1		1	6.2	4.5	HVLP	Must be followed by clearcoat with VOC of 3.7lbs/gal or less
Clearcoat	DuPont	72400S	12305S	12375S 12385S	4	1	10 %	3.6	4.5	HVLP	Preceded with a basecoat system
Clearcoat	DuPont	3600S	3605S	1075S 1085S 1095S	4	1	10 %	3.6	4.5	HVLP	Preceded with a basecoat system
Clearcoat	DuPont	3500S	3575S	1075S 1085S 1095S	3	1	.1	3.5	4.5	HVLP	Used in BC/CC system