

Air Pollution Control Requirements for Automotive Refinishing

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New York State's Air Pollution Control Regulation for Surface Coating Processes, 6NYCRR Part 228, requires businesses that perform surface coating processes to use certain equipment and materials designed to reduce solvent emissions. Paints and reducers/thinners typically contain some percentage of volatile organic compounds (VOC) that evaporate during the surface coating operations and contribute to the state's air pollution problems such as the formation of ozone/smog.

Starting January 1, 2005, several important changes to Part 228, will affect auto body shops:

- Part 228 will apply to all auto body refinishing facilities, regardless of the location in the state. In the past, Part 228 applied only to those auto body refinishers located in the New York City Metropolitan Area.
- All auto body refinishers will have to use complying coatings, high efficiency spray equipment and new cleaning methods, regardless of paint usage rates.

Paint & Equipment Requirements

Part 228 requires the use of compliant coatings (listed at right) AND the use of high transfer efficiency application techniques.

Compliant coatings have a lower solvent content and were developed by paint and coatings manufacturers in response to federal and state requirements to reduce VOC emissions across the country. If you specify to your vendor that you need compliant coatings, and mix them (proper amount of reducer) according to the manufacturer's directions, you will meet VOC limits. As you can see, the limits vary according to the coating type.

From Table 2 Part 228

Coating Type	Max. VOCs
Automotive pretreatment primer	6.5
Automotive primer-surfacer	4.8
Automotive primer-sealer	4.6
Automotive topcoat:	
Single stage-topcoat	5.0
2 stage basecoat/clearcoat	5.0
3 or 4-stage basecoat/clearcoat	5.2
Multi-colored	5.7
Automotive Specialty	7.0

Most auto body and refinishing shops are expected to use High Volume Low Pressure (HVLP) paint spray guns to comply with the new high transfer efficiency requirement in Part 228. This type of spray equipment is designed to minimize paint and solvent waste by reducing overspray and bounce back of paint droplets. Part 228 requires that a maximum cap pressure of 10.0 psig be maintained during spraying. If used properly, this equipment will result in some real savings in material costs per job and reduce solvent emissions. To maximize the efficiencies that can be achieved with this type of equipment, applicator training is highly recommended.

Record Keeping

All facilities must keep records on site to verify the actual VOC content of each coating as applied. Records of purchases and usage of coatings and solvent must also be maintained in a format acceptable to the NYS Department of Environmental Conservation (DEC). Copies of purchase receipts and a simple log showing material usage on a monthly basis must be maintained. These records must be submitted to DEC if requested. In addition, information about the application equipment including the paint spray booth should be kept. All records must be maintained at the facility for five years.

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Materials Handling and Storage

Containers used to store paints, solvents, rags or any other items that contain solvents must be kept closed. Spills must be minimized during handling and transfer of materials. Coating application equipment must be cleaned using methods that capture or minimize VOC emissions.

Air Facility Registration

The following table is intended to be a guide to determine which businesses are required to apply for a DEC Registration Certificate.

Geographic Location	Total Facility Usage	Regulatory responsibility
<p>New York City Metropolitan Area. All of the city of New York, and Nassau, Suffolk, Westchester and Rockland Counties</p> <p>And</p> <p>Lower Orange County Metropolitan Area. The area including the towns of Blooming Grove, Chester, Highlands, Monroe, Tuxedo, Warwick and Woodbury</p>	<p>Your actual VOC <u>emissions</u> are less than 12.5 tons per year</p>	<p>You must comply with Part 228 and obtain a registration from your Regional DEC</p>
<p>The rest of New York State</p>	<p>If you use less than 25 gal. of coating materials (paints) and cleaning solvents, combined per month</p>	<p>You must comply with Part 228, however no registration from DEC is required: though records must be maintained as described above</p>
	<p>More than 25 gal. of coating materials (paints) and cleaning solvents, combined per month and less than 25 tons per year of actual VOC emissions</p>	<p>You must comply with Part 228 and obtain a Registration from you Regional DEC</p>

New Special Exemption

If you only paint small areas, nine square feet or less, and use no more than 55 gallons of coatings and cleaning solvents on an annual basis, you may be exempt from registration requirements provided the painting area is vented through a particulate filter and you comply with all of the requirements of Part 228 described above.

The information in this fact sheet is intended for general reference only; it is not a full and complete statement of the technical or legal requirements associated with the regulation.

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