

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
NONRULE POLICY DOCUMENT

Title: **Automobile Refinishing Rule.**

Identification Number: **Air-009NPD**

Date Originally Adopted: **May 9, 1997**

Dates Revised: **None.**

Other Policies Repealed or Amended: **None.**

Brief Description of Subject Matter: **Clarification of record keeping requirements.**

Citations Affected: **326 IAC 8-10.**

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The purpose of this nonrule policy is to clarify record keeping requirements applicable to parties subject to the automobile refinishing rule in Indiana's ozone nonattainment counties.

Background

The Indiana Air Pollution Control Board promulgated 326 IAC 8-10 on October 3, 1995, to control volatile organic compound (VOC) emissions from automobile refinishing operations in Clark, Floyd, Lake, and Porter counties in Indiana. The rule specifies that VOC emissions in the affected areas must be limited after May 1, 1996. This control measure is specifically required by the 1990 Clean Air Act and is part of Indiana's clean air plan for these counties.

In view of the planning requirements and the nature of the ozone standard, it is necessary that the rule ensures that compliance with the emission limits is achieved on a daily basis. This is because the state and federal health standard for ozone is a daily standard, based on the short term health effects of exposure to high levels of ozone. Each day ozone levels are above federal and state health standards is considered an "exceedance" day.

The rule specifies three control options: use of compliant coatings and surface preparation products; use of noncompliant coatings plus an add-on control system; or a combination of the first and second options. For each control option the record keeping requirements of the rule are intended to assure that emissions of ozone precursors are reduced on a daily basis.

The compliant coatings and surface preparation products option uses a phased-in approach to enable distributors time to clear their inventory of noncompliant coatings and surface preparation products. For this reason, manufacturers are required to keep records that include the product description, date of manufacture, and thinning instructions. Coating distributors must maintain records of all coatings or surface preparation products that they sell in the affected counties.

Control programs that rely on the use of compliant coatings also must contain provisions to ensure that the VOC content limits are complied with on an “as applied” basis, that is, as people actually use them. This is particularly true with an activity such as refinishing, where the refinishers may mix a number of components, with different VOC content, to achieve the desired results. Therefore, owners or operators of refinishing facilities are required to keep records that include the name and identification of the coating or surface preparation product and its coating category, the name and manufacturer’s identification number, the quantity used, the VOC content as supplied, the name and manufacturer’s identification number of components such as catalysts, reducers, and hardeners added, the quantity of components added, the VOC content of components added, and for each surface preparation product, the type of substrate to which the product is applied.

Policy

1. Product manufacture date. 326 IAC 8-10-6(a) requires that coating manufacturers keep a record of, and also provide to the purchaser, information regarding the products sold or supplied. One record to be kept and supplied is the product’s date of manufacture. This record is an important element in determining compliance with the rule. Since promulgation of the rule several coating manufacturers have requested whether date code, rather than the date itself, would comply with the rule, if the manufacturer supplies IDEM with a key to the code.

Policy: Coating manufacturers may provide IDEM a decoding system to use to determine compliance with 326 IAC 8-10-6(a). If a coating manufacturer intends to use this approach, the decoding system must be submitted to the attention of the Office of Air Management, Compliance Branch.

2. Surface preparation products. 326 IAC 8-10-9(a)(2)(C) requires that refinishing facilities keep a record of the quantity of surface preparation products used. These products are typically sold in one gallon containers and spray bottles. Refinishing facilities may not use all the contents of a container on one particular refinishing job or in one working day. In situations where the contents of a freshly opened container are only partially used on a refinishing job or in one working day, it may not be feasible for the facilities to estimate accurately the volume of products used.

Policy: Refinishing facilities may, for each calendar month, record the volume of each container and the number of containers of the surface preparation products used along with other information required in the rule.

3. Coating mix components. 326 IAC 8-10-9(a)(2)(F) requires that refinishing facilities keep records of the quantity of all components (for example, reducers and hardeners) added to the coating products. The general practice of preparing ready-to-spray coating is to add to the coating product (as received) the reducers, hardeners, etc., by ratio. Some facilities are able to record the quantity of components in volume units while other facilities may find it resource intensive to convert the ratios into units of volume.

Policy: Refinishing facilities may record the volume of the coating product in suitable units (quarts, gallons, pints, other) and the ratio of components added. The

department, to verify compliance with the rule, will determine the volume of components from the ratios.

4. VOC log sheets. IDEM's Compliance and Technical Assistance Program distributed VOC log sheets to assist automobile refinishing facilities to comply with 326 IAC 8-10.

Policy: The use of the form designed by IDEM is not mandatory. Any form that will enable a regulated source to record the required data may be used.

Additional Information

If you have any questions concerning this policy, please contact Janet McCabe, Chief, Air Programs Branch at 317-233-5694, Shri Harsha, Air Programs Branch, at 317-232-8228 or John Lovelace, Compliance and Technical Assistance Program, at 317-233-1042. You can also use the toll free number in Indiana at 1- 800-451-6027.

Copies of this policy are available at the Office of Air Management, Indiana Department of Environmental Management, Indiana Government Center-North, Room N1001, 100 North Senate Avenue, Indianapolis, Indiana 46204.

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