Maricopa County Air Quality Department
AQ-2013-002-Rule 345 (Vehicle And Mobile Equipment Coating)

Stakeholders' Comments And Department's Initial Responses
Re: Comments Received During The 30-Day Comment Period (Oct 3-Nov 3, 2014)

Stakeholder Comment #1

From: Marie Clarke [mailto:mclarke@paint.org]
Sent: Monday, November 03, 2014 1:32 PM
To: Kathleen Sommer - AQDX
Cc: Stephen Wieroniey
Subject: ACA Comments on Rule 345

Dear Kathy,

ACA would like to submit the attached comments on behalf of our Automotive Refinish Coalition. These comments are in response to the proposed rule revisions for AQ-2013-002 Rule 345: Vehicle and Mobile Equipment Coating. Please feel free to contact ACA with any questions.

Sincerely,
Marie

RE: Proposed Revisions to AQ-2013-002-Rule 345: Vehicle and Mobile Equipment Coating
Dear Ms. Sommer:
The American Coatings Association's (ACA) Automotive Refinish Coalition submits the following comments on the proposed revisions to AQ-2013-002-Rule 345: Vehicle and Mobile Equipment Coating. The American Coatings Association (ACA) is a voluntary, nonprofit trade association working to advance the needs of the paint and coatings industry and the professionals who work in it. The organization represents paint and coatings manufacturers, raw materials suppliers, distributors, and technical professionals. ACA serves as an advocate and ally for members on legislative, regulatory and judicial issues, and provides forums for the advancement and promotion of the industry through educational and professional development services.
ACA appreciates the opportunity to provide these comments to the Maricopa County Air Quality Department (Department). Although the new proposal addresses many of our previous concerns there are still several proposed changes to Rule 345 that will complicate compliance for manufacturers and end-users in Maricopa. Our principal concern is the removal of the "VOC Multi" calculation. The "VOC Multi" calculation is included in the National Rule and removing the calculation from rule 345 will burden both manufacturers and downstream users of auto refinish coatings as it adds confusion and uncertainty to the VOC calculation process. Consistency and uniformity amongst the State rules and the national rule reduces compliance burdens on both the regulated community and regulatory authorities alike. For this reason, ACA urges Maricopa County to maintain the "VOC multi" calculation.
Surface Preparations or Solvent Cleaners (Section 301; Table 345-1)
The proposed rule lists the VOC limit for "Surface preparations or Solvent cleaners in Tables 345-1 and 345-2 as 200 grams VOC per liter and 1.4 Pounds VOC per gal. These are not equivalent (200 gm/l converts to 1.7 lb/gal). ACA request that these tables be updated with the proper conversion ratio. 2

Spray-Gun Cleaning (Section 303.2)

With new technology in the development of spray equipment, there are guns that can be cleaned without using a gun cleaner and with less than or similar amounts of solvent as a pre-clean process. This new gun technology is easier to clean, but due to its design a gun cleaner will destroy the internal functioning parts. To restrict spray gun cleaning to only using a gun cleaner will ban the use of this technology, which can use less hazardous chemicals during its function and cleaning. ACA requests that the Department update the proposed regulations to allow for the use of this new gun technology.

VOC Calculations (Section 503)

The proposed changes to the rule include elimination of the "VOC multi" (Figure 1) and the addition of the following statement: "For multiple coating processes, calculate each VOC process as applied and sum all coatings to calculate total VOC."

Figure 1:

This proposed revision does not clearly indicate how the VOC for multi stage process should be calculated. The language is vague and open for interpretation. ACA strongly opposes the elimination of the "VOC multi" calculation. Keeping the "VOC multi" calculation will keep the regulations consistent with the calculation allowed in the EPA national rule. ACA does not support the introduction of a new alternate "averaging" or "summing" calculation. This only adds complexity and confusion for coating manufacturers without providing a clear benefit. ACA respectfully request that the Department keep the current "VOC multi" calculation.

$$\text{VOC multi} = \frac{\text{VOCbc} + \sum_{i=0}^{M} \text{VOCmci} + 2(\text{VOCcc})}{M + 3}$$

Where:

VOC_{multi} = VOC content of multi-stage topcoat, in grams VOC/liter of coating;

VOC_{bc} = VOC content of the basecoat, as determined in subsection 503.2;

VOC_{mc_i} = VOC content of midcoat i, as determined in subsection 503.2.;

VOC_{cc} = VOC content of the clearcoat, as determined in subsection 503.2; and

M = Number of midcoats.

In a situation where a "ground coat" is used prior to a basecoat, use of the equation shall be adjusted as follows: The ground coat will be considered the basecoat and the basecoat will be considered one of the midcoats.

If the Maricopa County Air Quality Department does not want to align with the national rule, ACA would also support a move consistent with the CARB VOC rule that provides VOC limits for each ready-for-use product (i.e.: 420 g/l for basecoats, 250 g/liter for clearcoats, etc.) and eliminates any requirement for VOC averaging calculations for two-stage and multi-stage.
ACA appreciates the opportunity to comment on the proposed changes to rule 345. We hope our comments are helpful to the Maricopa County Air Quality Department as it reviews this rule and prepares for the upcoming stakeholder workshop. Please contact ACA with any questions.
Respectfully Submitted,
Marie Clarke, Esq. Stephen Wieroniey
Counsel, Government Affairs Specialist, Health, Safety and
Environmental Affairs

Maricopa County Air Quality Department Response #1

From: Kathleen Sommer - AQDX
Sent: Monday, November 03, 2014 1:34 PM
To: Marie Clarke
Cc: Johanna Kuspert - AQDX
Subject: RE: ACA Comments on Rule 345

Thank you Marie. I will let you know if I have questions.

Kathleen Sommer M.P.H.
Planner II
Maricopa County Air Quality Department
(602) 506-6706

Stakeholder Comment #2

From: Marvin Burns [mailto:MBurns@Devilbissar.com]
Sent: Wednesday, October 08, 2014 12:29 PM
To: Kathleen Sommer - AQDX
Cc: William Hofert
Subject: FW: Maricopa County Air Quality Department: Draft Rule 345 (Vehicle And Mobile Equipment Coating) Next Steps

Kathleen,

I am the Atomization Engineering manager for DeVilbiss Automotive Refinishing. We provide finishing equipment into the automotive refinishing industry. We have worked extensively with SCAQMD over the years. We were the first spray gun manufacturer to get a non HVLP spray gun approved by SCAQMD.

I was forwarded a copy of the proposed draft of Rule 345, and have a couple of questions.

Section 501.2 states: Spray-gun transfer efficiency documentation: Manufacturer's certified spray-gun transfer efficiency documentation shall be made available to the Control Officer or representative of such, without delay during normal business hours.

- What do you mean by "certified spray-gun transfer efficiency documentation? What type of documentation do you want?
- For each non HVLP spray gun, we provide a certificate showing all the air quality districts that we have received written approval from (see attached). This information is also available on our web site (http://www.autorefinishdevilbiss.com/support/compliance-information/tekna-pro-prolite-approval-letters.aspx) with links to the individual approval letters. Is this sufficient?
- Currently SCAQMD and EPA only require transfer efficiency testing of non HVLP guns and comparing the non HVLP gun to the leading two HVLP guns. They do not require any transfer

efficiency testing for HVLP spray guns. Is this documentation required for HVLP spray guns? If so, what type of transfer efficiency documentation do you expect for HVLP spray guns?

Section 502.4 states:

Spray-Gun Tip Pressure Measurement: The measurement required in Section 303.1(a)(1) of this rule and shall be performed with the instructions supplied by the manufacturer for that purpose. The measurement shall be made:

a) Dynamically at the center of the air cap.
b) At the air horns, with the spray configured to a fan diameter of eight to ten inches on a flat surface being coated.
c) The axis of the fan pattern shall be perpendicular to this surface.

- Why is the spray configured to a fan diameter of 8-10" for HVLP guns?
- What happens if the HVLP gun is a touchup gun and does not produce a pattern size of 8-10"?
- Is there a recommended target distance that should be used to get the pattern size of 8-10"?

I would recommend simply checking the air cap pressures with the pattern control valve wide open. This is where the majority of the painters will spray, and it simplifies checking air cap pressures. I am not aware of any other rules specifying that HVLP cap pressures checked at a pattern size of 8-10".

If you have any questions, or need any additional information, please do not hesitate to contact me.

Maricopa County Air Quality Department Response #2

From: Kathleen Sommer - AQDX
Sent: Friday, October 10, 2014 4:07 PM
To: Marvin Burns
Cc: Johanna Kuspert - AQDX
Subject: RE: Maricopa County Air Quality Department: Draft Rule 345 (Vehicle And Mobile Equipment Coating) Next Steps

Hello Mr. Burns,

We have received your comments on Rule 345: (Vehicle and Mobile Equipment Coating) concerning the proposed rule requirements for spray-gun transfer efficiency documentation and efficiency testing.

After reviewing these comments and consulting with department staff, our formal responses will be published in the Draft Notice of Final Rulemaking (DNFR) after the close of the comment period on November 3, 2014.
I will contact you sooner if I need to clarify any of these questions before that time.
Thank you for taking the time to participate in the air quality rule making process.

Kathleen Sommer M.P.H.
Planner
Maricopa County Air Quality Department

Stakeholder Comment #3

From: brian@sinthium.com [mailto:brian@sinthium.com]
Sent: Wednesday, October 08, 2014 11:24 AM
To: Kathleen Sommer - AQDX
Subject: Comments

Kathleen,

In regards to our previous conversation about rule 345 specifically the automated gun cleaner and manual cleaning. I understand why it was written as such and with the advent of water Born products makes sense. However, in a solvent based system the logic and thought process is flawed.
Using a PPS or cup liner system and manually cleaning spray guns is a standard and compilable method, however with the way the rule is worded I must also use an automated gun cleaner. This not only increases labor and expense for the shop owners.
Given that, I do primarily custom work, I would have to purchase two machines, one for clear guns and one for metallic in order to not contaminate the clear. Manual cleaning is the best process and incurs no additional cost or waste.
In essence, what is starting is that once I have cleaned the equipment, I must clean it again.
Thank you for your time regarding this matter.

Thanks,
Brian Horstmann
Sinthium Inc.
www.sinthium.com
623-218-6244

Maricopa County Air Quality Department Response #3

From: Kathleen Sommer - AQDX
Sent: Friday, October 10, 2014 4:12 PM
To: brian@sinthium.com
Cc: Johanna Kuspert - AQDX
Subject: Maricopa County Rule 345 Comments

Hello Brian,

We have received your comments on Rule 345: (Vehicle and Mobile Equipment Coating) concerning your specialty shop cleaning spray-guns after using both clear and metallic paints.

After reviewing these comments and consulting with department staff, our formal responses will be published in the Draft Notice of Final Rulemaking (DNFR) after the close of the comment period on November 3, 2014.
I will contact you sooner if I need to clarify any of these questions before that time.

Thank you for taking the time to participate in the air quality rule making process.

Kathleen Sommer M.P.H.
Planner
Maricopa County Air Quality Department