

## **COMPLIANCE ADVISORY NOTICE**

### **AUTO REFINISHING RECORD KEEPING**

**To: Distribution List (attached)**

**From: Todd Nishikawa, Manager of Compliance and Enforcement**

**Date: April 6, 2005**

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All auto-body refinishers are required to maintain detailed coating and solvent usage records and material data sheets. This notice is to advise you, as one of the Placer County Air Pollution Control District's permitted businesses, that the District is requesting that permitted auto refinishers maintain charts or lists comparing all coatings and solvents for which limits have been established in Rule 234, Automotive Refinishing Operations, to the associated Rule limit. In addition, shops must keep and maintain other logs, records, and material data sheets that record material usage and the VOC content of coating products. The enclosures provide examples and instructions for the charts and logs that are to be maintained.

New record keeping forms are being provided because some shops are not maintaining all of the required records, or are not keeping records in a format that can be easily reviewed to determine compliance by either the operator or by the District inspector. At the same time some records are not being kept in an easily reviewed format, shops have expressed concerns about the extended duration of some inspections, and the associated burden upon the shops, that results when well organized records and summary data are not maintained. Using these charts and logs can assist you in maintaining compliance with the Rule as well as significantly decreasing inspection time on-site.

Accordingly, the District is requesting that records documenting compliance be kept in the formats provided, or in equivalent alternative summary formats that provide the information required by Rule 234. If the required information is not kept in the manner prescribed by Rule 234, this is a violation of the rule. Record keeping is not an end in itself - operators cannot maintain compliance with Rule 234 limitations without knowing the VOC information that is the subject of the record keeping, and furthermore compliance cannot be demonstrated to the District without these records. This request is made pursuant to Section 500, Monitoring and Records, of Rule 234, Automotive Refinishing Operations, and pursuant to Health and Safety Code Section 42303, Information Disclosure.

Rather than burden all shops with the costs of inspecting those that fail to properly maintain their records, the District will charge a Re-Inspection Fee, based on the District's hourly labor rate, for each re-inspection that is required beyond an initial inspection of up to 4 hours. Shops that maintain readily accessible records should not require lengthy inspection or re-inspections.

Rule 234, Automotive Refinishing Operations, requires operators of facilities subject to the Rule to maintain a current listing of all as-applied VOC containing materials in use at the facility. In addition, current coating technical data sheets, which list the VOC content of each material, are required to be available for review on site. A record of the total facility VOC emissions is also required on a monthly basis. The rule also requires that any person using precoat shall verify compliance with Section 307 by retaining purchase invoices and records of applied volume of precoat on a monthly basis.

To aid complying with Rule 234, we are providing the following three forms:

1. Coating System Line Products List is required for each paint system used and stored on site. This is a listing of all of the paint system components which have VOC containing compounds, which make up your paint system. A list may be provided to you by the manufacturer or distributor of your coating system, and can be used if it has all the information required by Rule 234. The list must reflect current coating use.
2. Miscellaneous VOC-Containing Products List is required for VOC containing products that are not part a paint “system”, but assist in the refinishing process. Examples of materials that are required to be listed include aerosols that do not have pigments or resins, like strippers, or bulk solvent. The list must reflect current products used.
3. A Monthly Record of VOC Emissions from Automotive Refinishing Operations is required. The monthly log is acceptable and compliant if it includes both paint system and miscellaneous product usages and meets the requirements of Rule 234.

These forms may be filled-out by-hand; or alternatively they may be completed electronically. Paper copies of the forms are enclosed. Also, a CD is enclosed that contains the forms in two formats: printable Adobe Acrobat (PDF) files; and electronic file entry format (the lists are provided in Microsoft Word; the monthly record in Microsoft Excel).

Technical Data Sheets are required for each VOC containing material used and listed on a Product Lists. Technical data sheets must include the VOC content “As Applied Without Water and Exempt Solvents”, as well as “As Applied With Water and Exempt Solvents”. The VOC content “As Applied Without Water and Exempt Solvents” is required for determining compliance with rule limits. Whereas the VOC content “As Applied With Water and Exempt Solvents” is required to calculate monthly VOC emissions.

All required records must be retained for at least 3 years and are to be made available to the District’s inspector upon request.

You are currently subject to the record keeping requirements of Rule 234. In inspections conducted after **November 1, 2005**, the District will take immediate enforcement action regarding any failures to maintain required records. Fees will be charged for re-inspections required to verify compliance.

You are requested to review your record keeping procedures and methods. You may contact Anne Bertrand, District Specialist, at (530) 745-2329, or by e-mail at [abertran@placer.ca.gov](mailto:abertran@placer.ca.gov), if you have any questions or if you wish to schedule a consultation meeting to informally review your record keeping practices. Inspections conducted before November 1, 2005, may result in Notices to Comply, but will not result in an enforcement action for record keeping violations. Notices of Violation will be issued for non-record keeping violations.