

PPG 19699 Progress Drive Strongsville, Ohio 44149 USA Telephone: 1-800-647-6050

Substrate Cleaner Guidance under auto refinish regulations in North America

Parts of North America have auto refinish regulations that carry the lowest VOC standards for products used - based on the California Air Resources Board Suggested Control Measure (CARB SCM) model rule. These auto refinish regulations are found in California, Maryland, Delaware, Washington DC and Canada. Typically, they call for cleaners with a VOC content at 0.21 lbs./gal., with a few exceptions. VOC limits for all coatings categories and products compliant with those regulations are well documented.

Outside of those jurisdictions, the remainder of the US generally follows national rule VOC limits for coatings categories. However, a few parts of the country have unique substrate cleaner VOC limits that local shops should be aware. PPG Refinish offers a variety of products, compliant with local regulations. The following table lists those regions, their regulations and recommended PPG OneChoice[®] cleaners.

| -8 | | | Jefferson | Maricopa | | | Tennessee | | Wisconsin | |
|--------------|--|--------------------|------------------|--|------------------|-------------------|-------------------|-----------------|-----------------|-------------------|
| | | | County (Metro | County (Metro | | | (Select | Texas (select | (Select | Canadian |
| Region | Metro Chicago | Indiana | Louisville) | Phoenix) | Massachusetts | Rhode Island | Counties) | counties) | counties) | National Rule |
| Counties, | | | | | | | | | | |
| Townships | See Note 1 | All | Jefferson | Maricopa | All | All | See Note 2 | See Note 3 | See Note 4 | All |
| | Illinois | | | | | | | | | |
| | Administrative Code Title 35 | | | Maricopa County Air | Massachusetts | | | | | |
| | Subtitle B | | Air Pollution | Pollution | DEP Air | Rhode Island | | Texas | | |
| | Chapter I | Indiana | Control District | Control | Pollution | DEM Air | Tennessee DEC | Administrative | Wisconsin | Canada |
| | Subchapter c | Administrative | ofJefferson | Regulation III, | Control | Pollution | 1200-03 | Code Title 30 | Administrative | Gazette, Part II, |
| | Parts 218 & | Code Title 326 | County | Rule 345, | Regulation 310 | Regulation | Chapter 18 | Part 01 | Code Chapter | Volume 143 No |
| Rule No. | 219 Subpart HH | Article 8 Rule 10 | Regulation 7.79 | Section 301 | CMR 7.18 (28) | Chapter 30 | Section 45 | 115.421 (12) | 422 Section 95 | 14 |
| | 6.5 Plastic / 1.4 | 6.5 Plastic / 1.4 | | | 6.5 Plastic/1.67 | 6.5 Plastic / 1.4 | | | | |
| Rule Limits | Other (Metal) | , , | 1.7 All | 1.4 All | Other (Metal) | Other (Metal) | 1.7 All | 1.4 All | 0.42 All | 0.42 All |
| Exemption | NA | NA | NA | NA | NA | NA | NA | NA | See Note 5 | See Note 6 |
| SU4901 | Plastic Only | Plastic Only | Plastic Only | Plastic Only | Plastic Only | Plastic Only | Plastic Only | Plastic Only | Plastic Only | Plastic Only |
| SWX350 | Yes Both | Yes Both | Yes Both | Yes Both | Yes Both | Yes Both | Yes Both | Yes Both | Yes Both | Yes Both |
| SX103 | Plastic Only | Plastic Only | N | N | Plastic Only | Plastic Only | N | N | Exemption | Exemption |
| SXA103 | Plastic Only | Plastic Only | N | N | Plastic Only | Plastic Only | N | N | Exemption | Exemption |
| SX320 | N | N | N | N | N | N | N | N | Exemption | Exemption |
| SX330 | N | N | N | N | N | N | N | N | Exemption | Exemption |
| SX440 | N | N | N | N | N | N | N | N | Exemption | Exemption |
| SXA330 | N | N | N | N | N | N | N | N | Exemption | Exemption |
| SX394 | Yes Both | Yes Both | Yes Both | Yes Both | Yes Both | Yes Both | Yes Both | Yes Both | Exemption | Not Available |
| SX1009 | N | N | N | N | N | N | N | N | Exemption | Not Available |
| 0/12000 | | | N | in the second se | | | | | Exemption | Notrivaliable |
| Counting To | | | | | | | | | | |
| Counties, To | | ok DuBago Kang | Lako McHonry | and Will Counting | | hin and Gooso La | ko Townshin in Gr | undy County and | Oswogo Townshir | in Kondall |
| Note 1 | Chicago Area : Cook, DuPage, Kane, Lake, McHenry and Will Counties. Aux Sable Township and Goose Lake Township in Grundy County and Oswego Township in Kendall County / Metro East Area : Madison, Monroe, and St. Clair Counties | | | | | | | | | mikendan |
| Note 2 | Applies to any facility located in Davidson, Rutherford, Sumner, Williamson or Wilson County whose potential emissions fro the facility is greater than 15 pounds of volatile | | | | | | | | | |
| | organic compounds (VOC 's) per day. | | | | | | | | | |
| Note 3 | Applies to regulated regions of the Dallas-Fort Worth area (Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Rockwall, and Tarrant Counties), the Houston-Galveston- | | | | | | | | | |
| | Brazoria area (Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, and Waller Counties), and the El Paso area (El Paso County). | | | | | | | | | |
| Note 4 | Applies to Kenosha, Kewaunee, Manitowoc, Milwaukee, Ozaukee, Racine, Sheboygan, Washington, or Waukesha counties if VOC emissions from all industrial cleaning | | | | | | | | | |
| | operations associated with automobile refinishing operations at the facility, before consideration of controls, equal or exceed 3 tons on a 12 consecutive month rolling basis. | | | | | | | | | |
| Exemptions | 1 | | | | | | | | | |
| Note 5 | (f) Subsection (7) (a) and (e) do not apply to cleaning with aerosol products if 160 fluid ounces or less of VOC-containing aerosol products are used per day for industrial | | | | | | | | | |
| Note 5 | cleaning operations per facility. | | | | | | | | | |
| | (h) Subsection (7) (e) does not apply to cleaning with solvents or solvent solutions in spray bottles or containers described in sub. (7) (b) 2. Closed containers or hand held | | | | | | | | | |
| | spray bottles from which solvents or solvent solutions are applied without a propellant-induced force. | | | | | | | | | |
| Note 6 | Definition for Canada-surface cleaner means a product used to prepare the surface of motor vehicles or mobile equipment by removing unwanted matter from the surface | | | | | | | | | |
| | before applying a coating. It excludes products used for cleaning automotive refinishing equipment and hand-held spray bottle spot cleaners used to prepare surfaces prior to sanding. | | | | | | | | | |
| | Non-Application (2) These Regulations do not apply in respect of automotive refinishing products set out in column 1 of the schedule that are (c) imported, offered for sale or | | | | | | | | | |
| | | llable aerosol spr | | | | | | | ., | |

The surface cleaner restrictions referenced in this notification limits the choices available to customers in the affected areas. For these areas PPG recommends the use of SX394 1.4 Low VOC Cleaner and SWX350 H2O-SO-CLEAN[®] Waterborne Pre-Cleaner for use on metal and plastic substrates. SWX350 and SX394 have the ability to remove most contaminants common in the automotive collision industry including wax and grease, mold release agents and sanding dust.

When using these products it is important to remember these key steps to ensure success:

- Apply a generous amount of material to the surface to float contaminants to the top
- Wipe thoroughly with a clean, dry cloth to remove the contaminants and cleaner
- For maximum results, wipe dry with clean cloth while the surface is still wet to eliminate streaks

As always, PPG recommends washing vehicles with soap and water before starting any repairs. Employing these simple steps will help all collision centers maintain the quality finishes achieved today and remain productive while doing so.

A few additional comments with respect to this guidance document:

- Products dedicated to substrate types cannot be used for non-recommended substrates. SX103 and SXA103 MULTI-PREP[™] are intended for plastic substrate (only). Allowed in the rules at a higher VOC (than metal substrate cleaners and) they cannot be used for Other (Metal) substrates as they do not meet the VOC limit <u>and</u> TDS and labels only recommend for use on plastic substrates. Always review TDS for recommended substrates
- 2.) The public website <u>www.ppgrefinish.com</u> offers product line wall charts with favorite products compliant with local regulations. Go to **PRODUCTS** in the toolbar at the top of the page then select your **product line** in the dropdown list then **VOC CHARTS** in the smaller blue toolbar in the middle of the page then under **VOC AS APPLIED** pick **your region wall chart.**
- 3.) For a database of product codes suitable for your region on the same website select **MY PPG** in the toolbar at the top of the page then **VOC/ADS** in the dropdown list then select the last file on the page titled **PPG Refinish ADS Chart** to cross reference your code(s) with your region.
- 4.) If a distributor wants to order non-compliant products for an exempted activity, perhaps a customer outside their region is allowed to use at their facility, they can complete a Product Justification Form (PJF) waiver that allows unrestricted access. Contact your local sales rep for a guidance document. Once a PJF is filed it could take up to 24 hours to clear the system and allow an order.

For additional questions contact Customer Service at 1-800-647-6050. Customer Service can also assist on filing PJFs.

Kathryn Willson / Product Stewardship Automotive Refinish, Fleet and CPC - USCA