



PPG Industries

Mobile Repair Business Product Stewardship Guidelines

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Disclaimer

This "Mobile Repair Business Product Stewardship Guidelines" is intended to provide information for review by PPG's customers. In providing this "Mobile Repair Business Product Stewardship Guidelines", PPG makes no separate or additional warranties, expressed or implied, and assumes no liability or responsibility arising out of its use. It is the responsibility of each customer, re-seller and end user of PPG's products to independently ascertain that their practices are legal, appropriate and constitute sound product stewardship. This "Mobile Repair Business Product Stewardship Guidelines" is general in nature and is not intended to address site or product-specific issues. Approaches to different issues may vary depending on individual circumstances. This "Mobile Repair Business Product Stewardship Guidelines" is not intended to define or create legal rights or obligations. It is the responsibility of each customer, re-seller and end user to comply with all federal, state, provincial and local laws.

1. General Guidelines

PPG is committed to marketing products in a responsible manner that protects employees, neighbors, customers and the environment. Several PPG Refinish paint lines are utilized in the Auto Refinish Mobile Repair business, which involves repair and repainting of smaller areas of an automobile in an automotive facility. When auto repair and painting are being done in a location other than in a building designed for these activities, it is essential that the activities be conducted in a manner that ensures protection of people, including workers, neighbors and bystanders, the environment and the property at the mobile repair location.

Before handling PPG products, users should read and understand the information on the label, the product Safety Data Sheet (SDS) [also referred to as Material Safety Data Sheet (MSDS)] and product use instructions. The SDS and label contain all the information necessary for the safe handling, storage and use of PPG products including the health and physical hazards specific to each product.

2. Repackaging Guidelines

In the Mobile Touch-Up or Mobile Repair business, it may be necessary to repackage or "pour-off" authorized PPG Refinish paints. Repackaging should take place in a well ventilated area which is equipped for paint handling and designed to contain paint spills. Under no circumstances should there be open containers of paint in residential settings. PPG prohibits repackaging of paint in residential settings including garages of residences.

3. Product for Professional Use Only

Product Stewardship Advisory: Prohibition on Sales to Non-Professionals

Periodically, PPG takes the opportunity to reinforce important product stewardship information to its customers. As you know, PPG takes very seriously the subject of product safety and our expectation is that our customers will conduct their businesses in the same fashion. To further manage product stewardship, PPG provides its customers with product bulletins, SDSs, and other literature for our products. It is the reseller's responsibility to provide these materials to its customers.

To reinforce this important message on the safe and proper usage of our products, PPG's product labels expressly state "for professional use only". Consequently, selling PPG Refinish products to a do-it-yourselfer or ANY NON-PROFESSIONAL CONSUMER is inconsistent with PPG's product safety requirements. PPG cannot and will not be responsible for any claims or problems arising from the advertising or sale by distributors to non-professionals.

4. Material Transportation Safety

Some of PPG's products are regulated by the U.S. Department of Transportation as Hazardous Materials. These products must be classified, packaged, marked, labeled, and documented for transportation according to DOT 49 CFR Hazardous Material Regulations. Persons offering or transporting hazardous materials must be trained, tested, and certified according to 49CFR Part 172.700. Shipments may require hazardous material shipping papers and emergency response information. Under certain conditions, many of the requirements of 49 CFR are exempt if the material is offered and transported as a material of trade. See DOT 49 CFR, Part 173.6.

Although customers should review the regulation in detail to see how this exception may apply to their particular situation, we have tried to summarize some of the key points in relation to PPG Products. The intent of the regulation is to allow small users to transport certain quantities of hazardous materials without being subject to the majority of DOT regulations including shipping papers, DOT Registration, Training, Emergency Response, etc. In the case of Mobile Repair, small jobbers or contractors transporting our product to or from a warehouse or job site may fall into this category - provided they follow the prescribed DOT limitations. One of the most significant limitations is that the exception only applies to ground shipments in a personal or company vehicle. If the customer needs to ship via a common carrier or UPS etc., the normal DOT regulations still apply.

Although the regulations may provide some relief, PPG strongly recommends that employers continue to provide safety and emergency response training to their employees regarding hazardous materials and our products.

Attached is a brief summary of the regulation.

DOT Regulatory Relief for Hazardous Material Transportation Materials of Trade Exception

Introduction

The United States Department of Transportation (DOT) provides some regulatory relief for US paint customers transporting hazardous materials. The regulation is found at 49 CFR, Part 173.6 and is now in effect.

Definitions

A Material of Trade means "a hazardous material, other than a hazardous waste, that is carried in a motor vehicle by a private motor carrier in direct support of a principal business that is other than transportation by a motor vehicle." For our purposes, this means a paint contractor may be able to transport PPG Paint Products in their vehicles to or from a warehouse or job site without being subject to most DOT regulations.

Limitations

1. This exception does not apply to all hazardous materials. Although most PPG Refinish products are eligible for this exception, users should review their particular situation to determine whether the exception is applicable.
2. The exception only applies to those businesses actually transporting their own product. If customers need to ship hazardous materials by a common carrier or UPS etc., they must still comply with all DOT regulations.
3. Although the regulations may provide some relief, we strongly recommend that our customers continue to provide safety and emergency response training to their employees regarding hazardous materials and our products.

Provisions

1. Products: Most PPG Refinish Products eligible for this exception fall into Class 3 - Flammable and Class 8 - Corrosive hazard classes. The following table shows the maximum quantity per container or package. The total aggregate quantity of hazardous materials per vehicle is 440 Pounds.

DOT Hazard Class	Coatings Products	Maximum Quantity Per Packaging
Class 3 Flammable PG I (Flammable Liquids with a Boiling Point \leq 95°F)	None	1 Pound or 1 Pint
Class 3 Flammable PG II or III	Paint and Paint Related Products	66 Pounds or 8 Gallons
Class 8 Corrosive PG I	A Few Pretreatment Products, Cleaners, and Strippers	1 Pound or 1 Pint
Class 8 Corrosive PG II or III	Most Pretreatment Products, Cleaners, and Strippers	66 Pounds or 8 Gallons

2. Packaging: Packages must be leak tight for liquids, securely closed, secured against movement, and protected against damage. Each material must be packaged in the manufacturer's original packaging, or a packaging of equal or greater strength and integrity.

3. Hazard Communication: The package must be marked with the common or proper shipping name to identify the material it contains. If the products are in the original Coatings package, this marking will already exist.

5. Neighbors and Bystanders, Environment and Property Protection

Users of PPG products need to understand and comply with all environmental laws and regulations, including but not limited to air emissions, water and waste regulations in the location where they operate since these regulations vary throughout the country.

When determining a location to complete the auto repair and repainting, consideration should be given to the potential impact of these activities on the neighbors, bystanders, environment and property:

1. Choose an area in an automotive facility for the repair work that complies with the local, state and federal regulations.
2. Mobile Repair activities should not be conducted in high traffic areas, in areas near facilities that house people with compromised health, children or the elderly (i.e. hospitals, schools, nursing homes and daycare centers), in areas near waterways, sewers or manhole covers, in areas near maintenance activities where there might be trenches, in areas where there are sparks or other sources of ignition or in areas near any unusual activity.

Before handling PPG paints, read the label, SDS and product use information. When refinish painters are preparing car surfaces for painting, mixing paint and spraying paint, bystanders' inhalation and dermal exposure to various hazardous materials will be minimized by conducting the work in a well ventilated enclosed spray facility and following these safe work practices:

1. Restrict a wide enough area around the car preparation and painting activities to ensure bystanders will not be close enough to get paint overspray or other hazardous materials on themselves or have discomfort due to solvent or paint odors.
2. Post large signs around the car preparation and painting activities to alert bystanders to the spray painting and other car preparation activities. The signs should also indicate the area to be a NO SMOKING area. When using isocyanate-containing paint, post signs alerting bystanders that isocyanate-containing paint is being used.

6. Worker Protection

Before handling PPG products, users should read and understand the information on the label, the product Safety Data Sheet (SDS) and product use instructions. The SDS and label contain all the information necessary for the safe handling, storage and use of PPG products, including the health and physical hazards specific to each product. The product SDSs, the auto preparation methods, the paint preparation activities, the application methods and the workplace conditions must be reviewed and assessed to determine the potential hazards, the potential for exposure and the appropriate personal protective equipment (PPE) necessary to protect the workers.

The safe use and application of PPG products requires adequate ventilation and the use of safety glasses with side shields or safety goggles and the use of gloves appropriate to each task and product. Refinish paint products contain constituents that may cause eye and/or skin irritation, may be absorbed through the skin, and may also cause an allergic skin reaction such as hives or a rash and/or respiratory allergies. Workers should become aware of the specific health hazards of the products they are using and prevent eye, skin and respiratory system contact by using appropriate eye, skin and respiratory personal protection. A supplied-air respirator with a full facepiece is considered to be the most effective type of respirator in protecting against exposure to isocyanate-containing vapors and spray; however, a safety or industrial hygiene professional should be consulted to perform a hazard assessment and determine PPE recommendations. The assessment and PPE recommendations should be specific to the worker, job, products, exposure potential and workplace environment.

7. Overspray Minimization

When spray-painting car parts, the potential for inhalation and dermal exposure to paint overspray will be reduced by following these safe work practices:

1. Using high-volume, low-pressure (HVLP) spray guns to spray primers, basecoats, and clearcoats. [When operated correctly, HVLP spray guns have notably higher transfer efficiencies than conventional spray guns. The higher transfer efficiency means more paint materials end up on the car part being painted rather than in the work place air.]
2. Consulting with paint distributors and spray gun manufacturers to determine the HVLP spray gun settings that optimize transfer efficiencies. [The transfer efficiency of HVLP spray guns, and therefore the amount of paint overspray generated, is highly dependent on the spray gun settings that a painter selects (e.g., pressure in the air feed line) and on the painter's spraying technique.]
3. Training painters on proper spraying techniques. [Studies have shown that, through certain training programs, painters can increase their spray transfer efficiencies by improving certain elements of their spray painting techniques.]

8. Waste Disposal

Waste material must be disposed of in accordance with all applicable federal, state, provincial and local environmental control regulations. Empty containers should be recycled by an appropriately licensed reconitioner/salvager or disposed of through a permitted waste management facility. Additional disposal information is contained on the Environmental Data Sheet for each product, which can be obtained from your PPG representative.

For additional information, contact your PPG Representative or PPG Product Stewardship.

Published September 2005.

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