

Air Pollution Control Requirements for Architectural and Industrial Maintenance (AIM) Coatings Regulatory Update

Architectural and Industrial Maintenance (AIM) Coatings are regulated under 6 NYCRR Part 205. AIM coatings and reducers/thinners typically contain some percentage of volatile organic compounds (VOC) that evaporate during the surface coating operations, and contribute to air pollution problems such as the formation of ozone/smog and other related public health problems.

Requirements

Part 205 establishes VOC content limits (see Table of Standards), labeling requirements and “good housekeeping practices”. Recently, New York State Department of Environmental Conservation (DEC) passed emergency rule revisions to Part 205 and the changes are **EFFECTIVE IMMEDIATELY**.

Additional information about the regulation and rule revisions can be found at [Small Business Environmental Assistance Program Homepage](#) and by clicking on Architectural Coating BUSINESS SECTOR.

Requirements for Manufacturers

Container Labeling Requirements

Coating manufacturers subject to Part 205 are required to provide product information (see below) on the coating container, or on the label affixed to the container.

Label Requirements

- Manufactured Date or Date Code: ***Date Code must be on file with the DEC***
- Thinning recommendations
- Specific Labeling Instructions for:
 - Industrial maintenance coatings
 - Clear brushing lacquers
 - Rust preventatives
 - Specialty primers, sealers & undercoaters
 - Quick dry enamels

Record Keeping

Manufacturers of these coatings are required to:

1. Maintain a product list
2. Document proof of VOC content for each coating
3. Maintain distribution/sales data and include additional information on the container/affixed container label

All manufacturers must keep records on site to verify the actual VOC content of each AIM coating. Records must be maintained for five years and be made available to the DEC within 90 days ***upon their request***. Manufacturers of recycled AIM coatings or coatings that contain *perchloroethylene* or *methylene chloride* have additional reporting requirements (*Refer to section §205.5 for complete listing of additional requirements*).

Exemptions

The rule does not apply to: AIM coatings that are sold or manufactured for use outside of New York State; any aerosol-coating product; any architectural coatings that are sold in a container of one liter or less, products sold in quart containers are not subject to the regulation; or any asphalt pavement and asphalt based surface coating regulated under Part 241. These exemptions are valid only in New York State. Please check with other States to see what exemptions apply in their jurisdictions.

Table 1 - Table of Standards - VOC Content Limits for Architectural Coatings

Coating Category	VOC Limit (g/l)
Flat coatings	100
Nonflat coatings	150
Nonflat-high gloss coatings	250
Antenna coatings	530
Antifouling coatings	400
Bituminous roof coatings	300
Bituminous roof primers	350
Bond breakers	350
Calcimine recoaters	475
Clear wood coatings:	
<i>Clear brushing lacquers</i>	680
<i>Lacquers (including lacquer sanding sealers)</i>	550
<i>Sanding sealers (other than lacquer sanding sealers)</i>	350
<i>Varnishes</i>	350
<i>Conversion varnishes</i>	725
Concrete curing compounds	350
Concrete surface retarders	780
Dry fog coatings	400
Faux finishing coatings	350
Fire resistive coatings	350
Fire retardant coatings:	
<i>Clear</i>	650
<i>Opaque</i>	350
Floor coatings	250
Flow coatings	420
Form-release compounds	250
Graphic arts coatings (sign plates)	500
High Temperature Coatings	420
Impacted immersion coatings	780
Industrial maintenance coatings	340
Low solids coatings	120
Magnesite cement coatings	450
Mastic texture coatings	300
Metallic pigmented coatings	500
Multi-color coatings	250
Nuclear coatings	450
Pre-treatment wash primers	420
Primers, sealers & undercoaters sealers	200
Quick-dry enamels	250
Quick-dry primers, sealers & undercoaters	200
Recycled coatings	250
Roof coatings	250
Rust preventive coatings	400
Shellacs:	
<i>Clear</i>	730
<i>Opaque</i>	550
Specialty Primers, sealers & undercoaters	350
Stains	250
Swimming pool coatings & swimming pool repair & maintenance coatings	340
Temperature-indicator safety coatings	550
Thermoplastic-Rubber coatings & mastics	550
Traffic marking coatings	150
Waterproofing sealers	250
Waterproofing concrete/masonry sealers	400
Wood preservatives	350

1. The VOC limits listed are for the coating as applied (after thinning)
2. For coatings not listed in the above table and that do not meet the definition of the “specialty coatings” categories, the coating will be classified as flat, nonflat or nonflat-high gloss, as applicable, and the corresponding VOC coating limit will apply.



New York State Permitting Requirements

All AIM coating manufacturers located within New York State are subject to permitting requirements under DEC regulation 6 *NYCRR Part 201*. If you do not have a current Permit or Registration issued by DEC, please contact our office to determine your compliance status with this regulation.

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