

FACT SHEET



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Standards for Architectural and Industrial Maintenance (AIM) Coatings

VOC Rule 326 IAC 8-14

Office of Air Quality

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Background:

- Manufacturers, suppliers, sellers and users of architectural and industrial maintenance (AIM) coatings need to be aware of volatile organic compound (VOC) content limits, container labeling, and record keeping requirements in Indiana's VOC rule for AIM coatings.
 - AIM coatings are high performance architectural coatings formulated for the beautification and protection of interior and exterior surfaces exposed to extreme environmental conditions, (*i.e., immersion in water, wastewater, or chemical solutions, acute or chronic exposure to corrosive, caustic, or acidic agents, repeated high heat or heavy abrasion*). AIM coatings are typically applied by brush, roller, or spray gun to the interiors and exteriors of homes and offices, factory floors, bridges, traffic signs, roofs, swimming pools, and driveways.
- This rule became effective on November 1, 2010, and applies to all AIM coatings manufactured after October 1, 2011.
- You are subject to this rule if you supply, sell, offer for sale, or manufacture any AIM coating for use within the state of Indiana, or if you apply or solicit the application of any AIM coating within Indiana.
- The rule is found in the Indiana Administrative Code under 326 IAC 8-14. It is available on the Indiana Legislative Services website at <http://www.IN.gov/legislative/iac/T03260/A00080.PDF>.

Environmental Impacts:

- When AIM coatings are applied, the solvents in them evaporate, releasing VOCs to the air. Those VOCs contribute to the formation of ground-level ozone pollution. Ground-level ozone pollution can cause health problems and damage to some crops. The United States Environmental Protection Agency (U.S. EPA) sets health-based standards for ozone in the air we breathe.
- The VOC rule for AIM coatings is part of a regional effort by the Lake Michigan Air Directors Consortium's (LADCO) area states to reduce VOC emissions and meet U.S. EPA health-based standards for ozone in the upper Midwest and Eastern United States.

IDEM Role:

- The Indiana Department of Environmental Management (IDEM) is responsible for protecting human health and the environment while providing for safe industrial, agricultural, commercial, and governmental operations vital to a prosperous economy. IDEM issues permits, conducts inspections, provides technical assistance, and enforces regulations.

Manufacturer, Supplier, Seller and User Roles:

VOC Content Limit Standards

- Whether you are a manufacturer, supplier or seller, or are applying or soliciting the application of an AIM coating, make sure the AIM coating complies with the rule's VOC content limits found in 326 IAC 8-14-3(b).

- To determine the category for the AIM coating you manufacture, sell, or are applying, review the definitions of each coating category provided in 326 IAC 8-14-2. If more than one category definition fits your coating, then you must comply with the most restrictive VOC content limit.
 - If your coating is not specifically listed, then you must classify your coating as either flat, nonflat, or high-gloss, as defined in 326 IAC 8-14-2, depending on the gloss level of your coating. You must also meet the corresponding VOC limits listed in 326 IAC 8-14-3.
- All manufacturers should determine the VOC content of the coating using methods provided in 326 IAC 8-14-6. You may choose an alternative method of determining the amount of VOC in the coating (*such as formulation records, quality assurance checks and analytical testing*). However, the alternative method must first be approved, in writing, by IDEM and U.S. EPA. If your results from using an alternative means differ from the results of a Method 24 test (*which may be requested by IDEM*), the Method 24 results will govern.
- When applying an AIM coating, follow container management requirements, as well as requirements for thinning and cleanup.

Labeling and Record Keeping Requirements

- For products manufactured beginning October 1, 2011, each manufacturer of an AIM coating shall prominently display the following information on the coating container or label in which the coating is sold or distributed, as required in 326 IAC 8-14-4.
 - Date code (*date the coating was manufactured*).
 - Thinning recommendations.
 - VOC content.
 - Additional labeling as necessary for the following specific product types - industrial maintenance coatings, clear brushing lacquers, rust preventative coatings, specialty primers, sealers, and undercoats, quick dry enamels, nonflat-high-gloss coatings, and stone consolidants.
- All manufacturers should keep records to demonstrate compliance with the rule requirements, as described in 326 IAC 8-14-5.
 - Manufacturers of a coating that contains perchloroethylene or methylene chloride have additional record keeping requirements under 326 IAC 8-14-5(d).
 - Manufacturers of recycled coatings, bituminous roof coatings, and bituminous roof primers may be subject to additional record keeping requirements under 326 IAC 8-14-5(e) and (f).

Exemptions

- Following are some exemptions (*refer to the rule for exemptions that might apply to you*):
 - Any coating that is sold or manufactured for use outside the state of Indiana or for shipment to other manufacturers for reformulation or repacking.
 - Any aerosol coating product.
 - Any AIM coating that is sold in a container with a volume of one liter or less.

Additional Information:

- For information about the Office of Air Quality Compliance Branch, visit www.idem.IN.gov/airquality/2344.htm, and direct questions to staff at (317) 233-3861, or (800) 451-6027, ext. 3-3861 (toll free within Indiana).
- For more on Indiana's VOC Rules for Architectural and Industrial Maintenance (AIM) coatings:
 - visit IDEM's Rules Web page at www.IN.gov/idem/4686.htm and
 - refer to Office of Air Quality compliance information on IDEM's Compliance and Technical Assistance (CTAP) Web page at www.idem.IN.gov/ctap/2345.htm. Visit CTAP Featured Topics at www.idem.IN.gov/ctap/2332.htm for additional articles.