Air Permit Exemption for Auto Body Refinishers

Many smaller businesses around Wisconsin were required to submit air operation permit applications to the Wisconsin Department of Natural Resources (DNR) by the end of 1998. Because auto body shops generate air pollution from the paints, solvents, adhesives and other materials used, shop owners were expected to meet this 1998 deadline. After further review, the DNR determined it was appropriate to add an exemption from the air permit requirements for auto body refinishing shops.

What is the Exemption Level for Auto Body Shops?

The permit exemption for auto body repair or refinishing shops is 1,666 pounds of VOCs a month, prior to entering any control device. This number reflects the facility’s actual emissions, based on the amount of VOC containing material actually used. This amount can never be exceeded, or the exemption would no longer apply and an air permit would be required. The exemption applies to both construction permits and operation permits, so a new facility would not need a permit if it meets this exemption criterion.

How Do I Find Out if My Shop is Exempt?

To find out if your shop is exempt, you will need to do some calculations.

1. Record all VOC containing materials used or stored at your facility each month. Use data from months with highest coating usage. If records were not kept, get this information from your supplier.
2. Obtain Safety Data Sheets (SDSs) for each material you use, which come from your supplier.
3. Check the Physical Characteristics section of the SDS for each material, and be sure it lists either:
   - VOC content in pounds per gallon (lb/gal) or
   - VOC content in percent (%) by weight (wt) and density of coating in lb/gal.
4. If you do not find the value for VOC content in lb/gal listed, request that information from your supplier. Suppliers should know the VOC content of the materials they sell.
5. Using the VOC content in lb/gal, you can calculate VOC emissions. Multiply VOC content by the amount of coating used that month, measured in gallons, to calculate pounds of VOC per month for that coating. For example, if you used 100 gallons of coating containing 5.6 lbs VOC for one month:

   100 gallons per month x 5.6 pounds VOC/gallon = 560 lbs VOC/month

6. Complete this calculation for every paint, solvent, adhesive, etc., used during the month. (Remember to include VOCs from clean-up solvents directly related to the process, like gun cleaner for painting operations.)
7. Add up the VOC emissions from all coatings and solvents used, which will give you the total VOC emissions in pounds per month. If this total is less than 1,666 pounds per month, you are exempt from an air permit. Keep these records on site to show you are not required to have a permit.

What if VOC Emissions at My Shop Exceed the Exemption Level?

If emissions exceed the 1,666 pounds of VOC exemption level, you must apply for an air permit with the DNR or explore ways to reduce the amount of VOCs emitted from your shop (e.g., pollution prevention).

Applying for an Air Permit

If your facility is not exempt from the permit requirements, contact the DNR or Small Business Environmental Assistance Program (SBEAP) to obtain permit application materials and the instruction booklet. If you have questions about completing the forms, contact DNR or SBEAP for help.

Pollution Prevention Options

By reducing the amount of VOCs your shop emits into the air, you may be able to avoid the permit process, plus you will improve the environment and the air you and your family breathe. Some common (and simple) pollution prevention (P2) options include:

- Using paints and related products that emit fewer VOCs. Products with less solvent either have a higher solid content or have replaced as much solvent as possible with water or exempt solvents.
- Improving paint delivery systems/application equipment. High volume, low pressure (HVLP) spray equipment uses less air at higher pressures to deliver paint. This reduces the amount of material used on each job and reduces overspray and "bounce back."
- Keeping solvents and paints in closed containers to reduce evaporation.

Who Do I Contact for Assistance?

Contact the SBEAP for assistance on the auto body exemption or air permit requirements, or visit our web site (see below).