



## ENVIRONMENTAL SERVICES DEPARTMENT AIR QUALITY DIVISION

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**Technical Guidance #TG01-001**

**Date:** July 11, 2001

**Rule:** 335 and other coating rules

**Issue:** VOC limits for the onsite coating of components at manufactured-building and mobile home factories.

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**ISSUE:** At a facility that makes mobile homes, portable buildings, or similar structures – including manufactured buildings of either modular or unitary design – what coating rule(s) apply to the coating operations that may be encountered there?

**DISCUSSION:** Subsection 203 of Maricopa County Air Pollution Control Rule 335 (Architectural Coating) defines “*architectural coating*” as: “Any coating applied to stationary structures and their appurtenances, to mobile homes, to pavements or to curbs.”

Note that this definition does not discuss location or degree of completion. In the home-building industry, the starting point of a structure is the foundation; therefore, the coating of the foundation and anything attached to this foundation is subject to Rule 335. In the mobile home and portable building manufacturing industry, the analogous starting point of a structure would be the chassis or base.

### **CONCLUSION:**

- 1) At a facility where mobile homes, portable buildings, or similar structures – including manufactured buildings of either modular or unitary design – are being made, assembled, or altered, once any permanent component of a portable building or structure is attached or fitted to the chassis, either directly or indirectly, Rule 335 dictates the VOC content of coating applied to the resulting assemblage.
- 2) For the coating of anything else at the facility, apply the rule appropriate to the nature of the item being coated.

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