

**ENVIRONMENTAL QUALITY AND
COMMUNITY SERVICES AGENCY**
AIR POLLUTION CONTROL DIVISION
2406 South 24th Street, Suite E-214
Phoenix, Arizona 85034

(602) 506-6700
(602) 506-6862 (FAX)

PERMITS & COMPLIANCE
TECHNICAL GUIDANCE # TG-005

DATE: September 16, 1993

SUBJECT: Gel Coats

RULE: 336

Gel Coats are unsaturated, un-reinforced polyester resins mixed with a catalyst and possibly a pigment. They are generally used to form the smooth outer surface of products such as fiberglass boats, cultured marble counter tops, and other polyester resin products. Gel coats are also sometimes used to coat metals, such as awnings. For all the above examples, gel coat would be considered a "Surface Coating", subject to Rule 336.

Fiberglass, cultured marble, and other polyester resins are "Plastic Parts and Products". Therefore a gel coating operation not exempted under Section 306 of Rule 336, which is used in a fiberglass or cultured marble lay-up, or applied to a finished fiberglass or cultured marble product, would have to meet a VOC limit of 3.5 lb/gal. Compliance should be determined by sampling in accordance with Section 503 of Rule 336 if practical. If sampling is not practical, the VOC content would be the emission factor in lb/gal. as determined by application of the appropriate emission factor from the Table 4.12-2 of AP-42 to gel coat monomer content obtained from the MSDS.

Carroll Dekle, Manager
Permits & Compliance

Jo Crumbaker, Manager
Planning