



Massachusetts  
Department  
of  
ENVIRONMENTAL  
PROTECTION

# fact sheet

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

On October 19, 2007, the Massachusetts Department of Environmental Protection (MassDEP) promulgated its Architectural and Industrial Maintenance (AIM) Coatings regulation, 310 CMR 7.25(11). AIM Coatings (e.g., paints, stains, varnishes) and reducers/thinners typically contain volatile organic compounds (VOCs) that evaporate during surface coating operations and contribute to air pollution problems such as the formation of ground-level ozone (i.e., smog) and related public health problems. A copy of the AIM Coatings regulation is available at <http://www.mass.gov/dep/air/laws/regulati.htm#aimcp>.

### General Requirements

310 CMR 7.25(11) establishes VOC content limits for coatings, labeling requirements, and “good housekeeping practices” (for users of AIM Coatings).

- The AIM regulation applies to any person who manufactures, distributes, or sells AIM Coatings for use in Massachusetts and to any person who applies AIM Coatings in Massachusetts.
- The VOC content limits became effective on January 1, 2009 (see the Table of Standards below).
- **All AIM Coatings manufactured on or after January 1, 2009 that are intended for use in Massachusetts must meet the VOC content limits.**
- All AIM Coatings manufactured prior to January 1, 2009 that do not meet the VOC content limits must be sold and used by January 1, 2012. To qualify for this “sell through” period, the AIM Coating must be properly labeled and meet existing federal VOC standards. After January 1, 2012, all AIM Coatings must meet the VOC content limits. No noncompliant coatings can remain on vendors’ shelves or be applied after this date.

MassDEP’s AIM Coatings regulation does not apply to coatings that are manufactured or distributed for use outside of Massachusetts, aerosol-coating products, and coatings that are sold in containers of one liter or less. Please check with other states to see what requirements apply in other jurisdictions.

### Requirements for Manufacturers

#### Container Labeling

Manufacturers of AIM Coatings are required to provide product information on the coating container or on the label affixed to the container.

#### Recordkeeping

Manufacturers of AIM Coatings are required to maintain a product list, document proof of VOC content for each coating, and maintain distribution and sales data.

All manufacturers must keep records on site to verify the actual VOC content of each AIM Coating. Records must be maintained for three years and be made available to MassDEP within 90 days upon request.

#### Label Requirements

- Manufactured date or date-code (date-code must be on file with MassDEP)
- Thinning recommendations
- VOC content
- Specific labeling instructions for:
  - Industrial maintenance coatings
  - Clear brushing lacquers
  - Rust preventatives
  - Specialty primers, sealers & undercoaters
  - Quick dry enamels
  - Non-flat high-gloss coatings

**Massachusetts Permitting Requirements**

All AIM Coating manufacturers located in Massachusetts are subject to permitting requirements under MassDEP regulations, 310 CMR 7.02. If you do not have a current Permit issued by MassDEP, please contact Marc Wolman at (617) 592-5515 or [marc.wolman@state.ma.us](mailto:marc.wolman@state.ma.us) to determine your compliance status and permitting requirements.

**Table of Standards  
VOC Content Limits for Architectural Coatings**

| Coating Type               | VOC (g/l) | Coating Type                        | VOC (g/l) | Coating Type                                  | VOC (g/l) |
|----------------------------|-----------|-------------------------------------|-----------|---|-----------|
| Flat                       | 100       | Non-Flat                            | 150       | Non-Flat High Gloss                           | 250       |
| SPECIALTY COATINGS         |           |                                     |           |   |           |
| Antenna Coatings           | 530       | Fire Retardant - Clear              | 650       | Quick Dry Enamels                             | 250       |
| Antifouling Coatings       | 400       | Fire Retardant - Opaque             | 350       | Quick Dry Primers, Sealers and Undercoaters   | 200       |
| Bituminous Roof Coatings   | 300       | Floor Coatings                      | 250       | Recycled Coatings                             | 250       |
| Bituminous Roof Primers    | 350       | Flow Coatings                       | 420       | Roof Coatings                                 | 250       |
| Bond Breakers              | 350       | Form-Release Compounds              | 250       | Rust Preventative Coatings                    | 400       |
| Calcimine Recoater         | 475       | Graphic Arts Coatings (Sign Paints) | 500       | Shellacs – Clear                              | 730       |
| Clear Wood Coatings        |           | High Temperature Coatings           | 420       | Shellacs – Opaque                             | 550       |
| Clear Brushing Lacquers    | 680       | Impacted Immersion Coatings         | 780       | Specialty Primers, Sealers, and Undercoaters  | 350       |
| Lacquers                   | 550       | Industrial Maintenance Coatings     | 340       | Stains  | 250       |
| Sanding Sealers            | 350       | Low-Solids Coatings                 | 120       | Swimming Pool Coatings                        | 340       |
| Varnishes                  | 350       | Magnesite Cement Coatings           | 450       | Swimming Pool Repair and Maintenance Coatings | 340       |
| Conversion Varnishes       | 725       | Mastic Texture Coatings             | 300       | Temperature-Indicator Safety Coatings         | 550       |
| Concrete Curing Compounds  | 350       | Metallic Pigmented Coatings         | 500       | Thermoplastic Rubber Coatings and Mastics     | 550       |
| Concrete Surface Retarders | 780       | Multi-Color Coatings                | 250       | Traffic Marking Coatings                      | 150       |
| Dry Fog Coatings           | 400       | Nuclear Coatings                    | 450       | Waterproofing Sealers                         | 250       |
| Faux Finishing Coatings    | 350       | Pre Treatment Wash Primers          | 420       | Waterproofing Concrete/Masonry Sealers        | 400       |
| Fire Resistive Coatings    | 350       | Primers, Sealers, and Undercoaters  | 200       | Wood Preservatives                            | 350       |

The VOC limits listed are for coatings as applied (after thinning).

A coating that does not fit into one of the "specialty coating" categories must be classified as flat, nonflat, or nonflat-high gloss, as applicable, and the corresponding VOC content limit will apply.

**This fact sheet is intended for general reference only and does not represent a full and complete statement of the technical or legal requirements associated with the regulation.**

Massachusetts Department of  
Environmental Protection  
One Winter Street  
Boston, MA 02108-4746

Commonwealth of  
Massachusetts  
Deval L. Patrick, Governor

Executive Office of  
Energy & Environmental Affairs  
Ian A. Bowles, Secretary

Department of  
Environmental Protection  
Laurie Burt, Commissioner

Produced by the  
Bureau of Waste Prevention  
January 2009  
Printed on recycled paper

This information is available in  
alternate format by calling our  
ADA Coordinator at  
(617) 574-6872.

