



ADVISORY NOTICE

Rule 1113: Section (a); Section (b) Paragraph (67)

Original Review: January 1991

Revised Date: March 2018

Subject: Coating Applications of Portable Trailers

Issue:

The South Coast Air Quality Management District has been made aware of a concern about the applicability of portable trailers, such as mobile classrooms and field offices, to the provisions of Rule 1113, or the individual source specific rules of Reg. XI.

Current Rule Language:

Rule 1113 section (a) specifies that the rule is applicable to the coating of “stationary structures or their appurtenances”.

Rule 1113 section (b)(67) further defines a stationary structure and states “...include, but are not limited to, homes, office buildings, factories, mobile homes, pavements, curbs, roadways, racetracks, and bridges.”

Analysis:

According to the AQMD Portable Equipment Registration Program (PERP), a trailer is considered portable if it does not reside at the same location for more than 12 consecutive months. The placement of a portable trailer at a school or job site is similar enough to the use of a mobile home that the trailer should be considered a stationary structure, for the time it is at the site. However, during the construction or fabrication of a portable trailer (or mobile home) at its manufacturing site, the coating operation would be subject to the substrate specific rules of Reg. XI.

Conclusion:

The application of coatings to a portable trailer in the field is subject to the requirements of Rule 1113.

Comments or questions regarding Rule 1113 should be directed to areasources@aqmd.gov or call the Area Source team at 909-396-2390.