

What Is The Compliance Date?

- Existing Sources: January 10, 2011.
- New Sources: Upon startup after January 9, 2008.
- An affected source is a new source if you commenced construction of the source after September 17, 2007 by installing new paint stripping or surface coating equipment at a source not actively engaged in paint stripping and/or miscellaneous surface coating prior to September 17, 2007.
- An affected source is an existing source if it is not a new source or a reconstructed source (An affected source is reconstructed if it meets the definition of reconstruction in section 63.2.).

What are the Permitting Requirements?

- Affected facilities are exempt from Title V permit requirements provided they are not required to obtain a permit for another reason.

What Reporting/Recordkeeping is Required?

Reporting:

- Initial Notification (informs EPA that the facility is subject to the standards and when the source will be in compliance).
- New Sources: July 7, 2008 or 180 days after startup
- Existing Sources: January 11, 2010
- Notification of Compliance (certifies that the source is in compliance with the applicable requirements).
- New Sources: As part of the Initial Notification
- Existing Sources: March 11, 2011
- Annual notification of changes report—required each calendar year any reportable changes occur.

Recordkeeping (keep these records on file)

- Records to include copies of Notifications submitted to EPA.
 - Painter training certifications.
 - Spray booth filter efficiency documentation.
 - Spray gun transfer efficiency.
 - MeCl content information such as MSDS.
 - Annual usage of MeCl for paint stripping, and written MeCl minimization plan if annual usage > 1 ton per year.
 - Deviation and corrective action documentation.
- Records to be maintained in a form suitable and readily available for expeditious review.

You can also contact your Regional EPA air toxics office at the following numbers:

Region	Address	States	Website/Phone Number
Region 1	1 Congress Street Suite 1100 Boston, MA 02114-2023	CT, MA, ME, NH, RI, VT	www.epa.gov/region1 (888)372-7341 (617) 918-1650
Region 2	290 Broadway New York, NY 10007-1866	NJ, NY, PR, VI	www.epa.gov/region2 (212) 637-4023
Region 3	1650 Arch Street Philadelphia, PA 19103-2029	DE, MD, PA, VA, WV, DC	www.epa.gov/region3 (215) 814-2746
Region 4	Atlanta Federal Center 61 Forsyth Street, SW Atlanta, GA 30303-8960	FL, NC, SC, KY TN, GA, AL, MS	www.epa.gov/region4 (404) 562-9131 (800) 241-1754
Region 5	77 West Jackson Blvd. Chicago, IL 60604-3507	IL, IN, MI, WI, MN, OH	www.epa.gov/region5 (312) 886-6812 (312) 353-6684 (312) 886-6798
Region 6	1445 Ross Avenue Suite 1200 Dallas, TX 75202-2733	AR, LA, NM, OK, TX	www.epa.gov/region6 (800) 887-6063* (214) 665-7250 (214) 665-7224
Region 7	901 North Fifth Street Kansas City, KS 66101	IA, KS, MO, NE	www.epa.gov/region7 (800) 223-0425 (913)-551-7003
Region 8	1595 Wynkoop St. Denver, CO 80202-1129	CO, MT, ND, SD, UT, WY	www.epa.gov/region8 (800) 227-8917* (303) 312-6460
Region 9	75 Hawthorne Street San Francisco, CA 94105	CA, AZ, HI, NV, GU, AS, MP	www.epa.gov/region9 (415) 947-8715
Region 10	1200 6 th Ave. Suite 900, AWT-107 Seattle, WA 98101	AK, ID, WA, OR	www.epa.gov/region10 (800) 424-4372* (206) 553-6220

*For sources within the region only.

For More Information

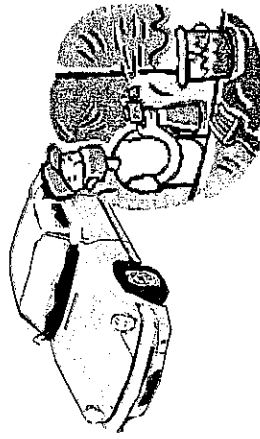
Copies of the rule and other materials are located at:
<http://www.epa.gov/ttn/atw/area/arearules.html>

For more information on state requirements, please contact your state representatives at:
http://www.epa.gov/ttn/atw/area/table_state_contacts.doc or,
<http://www.4cleanair.org/contactUsaLevel.asp>



Summary of Regulations Controlling Air Emissions from

PAINT STRIPPING AND MISCELLANEOUS SURFACE COATING OPERATIONS



NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS NESHAP (SUBPART HHHHHH) FINAL RULE



PAINT STRIPPING AND MISCELLANEOUS SURFACE COATING OPERATIONS (SUBPART HHHHHH)

What Is an Area Source?

- Any source that is not a major source. (A major source is a facility that emits, or has the potential to emit in the absence of controls, at least 10 tons per year (TPY) of individual hazardous air pollutants (HAP) or 25 TPY of combined HAP.)

Who Does This Rule Apply To?

- Area sources that engage in any of the following:
 - Paint stripping operations that use methylene chloride (MeCl)-containing paint stripping formulations;
 - Spray application of coatings to motor vehicles and mobile equipment;
 - Spray application of coatings to a plastic and/or metal substrate where the coatings contain compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

This rule does not apply to:

- Surface coating or paint stripping performed on site at installations owned or operated by the Armed Forces of the United States.
- Surface coating or paint stripping of military munitions or equipment directly and exclusively used for the purposes of transporting military munitions.
- Surface coating or paint stripping performed by individuals on their personal vehicles, property or possessions, either as a hobby or for maintenance of their personal vehicles, possessions, or property provided they coat no more than two vehicles per year.
- Surface coating or paint stripping that meets the definition of "research and laboratory activities."
- Surface coating or paint stripping that meets the definition of "quality control activities."

- Surface coating or paint stripping that meets the definition of "quality control activities."
- Surface coating or paint stripping activities that are covered under another area source NESHAP Motor vehicle or mobile equipment surface coating operations may petition the Administrator for an exemption from this subpart if you can demonstrate, to the satisfaction of the Administrator, that you spray apply no coatings that contain compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

What Am I Required To Do?

- Paint Stripping Operations—implement management practices that minimize emissions of MeCl.
 - Evaluate the need for paint stripping (e.g., is it possible to re-coat without stripping?).
 - Evaluate each application to identify potential alternative stripping methods.
 - Reduce exposure of strippers to air.
 - Optimize application conditions.
 - Practice proper storage and disposal.

- For each paint stripping operation with > 1 ton MeCl annual usage, develop and implement a written MeCl minimization plan. No implementation plan is needed if usage is < 1 ton MeCl; however, sources must still utilize work practices to minimize emissions of MeCl. Consult the MSDS sheet to identify the amount of MeCl contained in the paint stripper, but note that annual usage should not exceed 181 gallons of MeCl.
- Maintain records of annual usage of paint strippers containing MeCl.

Motor Vehicle/Mobile Equipment/Miscellaneous Surface Coating Operations.

- Train/certify all painters on spray gun equipment selection, spray techniques, maintenance, and environmental compliance (consult 73 FR 1738, pg. 1762, section 63.11173(f)(2)(i)-(iv)).
- Install/operate filter technology on all spray booths/stations/enclosures to achieve at least 98% capture efficiency.

- Spray booths/stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed and ventilated at negative pressure or up to 0.05 inches water gauge positive pressure for booths that have seals on all doors and other openings and an automatic pressure balancing system.
- Spray booths/stations used to coat miscellaneous parts or products or vehicle subassemblies must have a full roof, at least three complete walls or side curtains, and ventilated so that air is drawn into the booth.
- Spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless or air-assisted airless spray gun, or an equivalent technology.
- Paint spray gun cleaning must be done so that an atomized mist or spray of the cleaning solvent is not created outside a container that collects used gun cleaning solvent.
- Train and certify all personnel who spray apply surface coatings no later than 180 days after hiring or by July 7, 2008 (new sources) or by January 10, 2011 (existing sources).

What are the Impacts?

- Most paint stripping facilities already comply with the rule requirements. Estimate 1,000 facilities will need to take action to comply.
 - Reduce 1,000 tons MeCl annually,
 - Capital costs = \$1.5 million.
 - Annual benefit = \$0.9 million.
- Most surface coating facilities already comply with the rule requirements. Estimate < 25% of existing facilities will need to take some action to comply.
 - Reduce 6,900 tons of HAP annually including 11 tons of metal HAP.
 - Capital costs = \$20 million; however, initial cost to be offset and recovered over time by cost savings as a result of more efficient use of labor and materials.

INFORMATION NEEDED FOR INITIAL NOTIFICATION
Paint Stripping and Miscellaneous Surface Coating
Area Source Rule (last updated March 26, 2008)
Subpart HHHHHH
40 CFR 63.11169 – 63.11180

[This example format may be used to meet the Initial Notification requirements of Subpart HHHHHH; however, you are not required to use this format as long as you provide the information required by 40 CFR Section 63.11175(a).]

1. **Company Name (if applicable)** _____

2. **Information about the owner and operator:**

a. **Owner's Name and Title** _____

Owner's Street Address _____
Street City State Zip

Owner's telephone number _____

Owner's email (if available) _____

Is the Operator the same person as the Owner? Yes No

If the Operator information is different please provide the following (Attach a list with the same information for additional operators):

b. **Operator's Name and Title** _____

Operator's Street Address _____
Street City State Zip

Operator's telephone number _____

Operator's email (if available) _____

Is there any other certifying company official that will sign this form? Yes No

If Certifying Official information is different please provide the following:

c. **Certifying Official's Name and Title** _____

Certifying Official's Street Address _____
Street City State Zip

Certifying Official's telephone number _____

Certifying Official's email (if available) _____

3. **The street address (physical location) of the affected source**

Street City State Zip

Are the compliance records located at the same location? Yes No

If the location of compliance records is different please provide street address:

Street City State Zip

Is the source a motor vehicle or mobile equipment surface coating operation that repairs vehicles at the customer's location, rather than at a fixed location?

Yes No

4. **Identification of Standard (you must check this box):**

Yes, I am subject to 40 CFR Part 63 Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Source; Final Rule

5. **A brief description of the type of operation:**

For Surface Coating Operations

- a. I am a:
 - Motor Vehicle or Mobile Equipment Surface Coating Operation
 - Miscellaneous Surface Coating Operation
- b. Number of spray booths _____
- c. Number of preparation stations _____
- d. Number of painters usually employed _____

For Paint Stripping Operations

- a. Methods of paint stripping employed (check all that apply)
 - Chemical
 - Mechanical
 - Other (please describe) _____
- b. Substrates stripped (check all that apply)
 - Wood
 - Plastic
 - Metal
 - Other (please describe) _____

6. **Methylene Chloride (MeCl) Used by Paint Stripping Operations**

Do you plan to use more than 1 ton of MeCl annually? Yes No

7. **Compliance Status, please check one:**

For paint stripping operations, the relevant requirements that you must evaluate in making this determination are specified in 40 CFR 63.11173(a) through (d) of this subpart. For surface coating operations, the relevant requirements are specified in 40 CFR 63.11173(e) through (g) of this subpart.

- I am already in compliance with each of the relevant requirements
- I will be in compliance with each of the relevant requirements by the compliance date

New Source (after Jan 9, 2008) Compliance date is date of startup

New Source (after September 17, 2007 but before January 9, 2008) Compliance date is January 9, 2008

Existing source (before September 17, 2007) Compliance date is January 10, 2011

8. **Certification of compliance status**

You must check one:

Note: Initial startup is the first time equipment is brought online in a paint stripping or surface coating operation, and paint stripping or surface coating is first performed.

- I am a new source (Initial startup was on or after January 9, 2008) Date _____
- I am a new source (Initial startup was after September 17, 2007 but before January 9, 2008) Date _____

If your source is a new source, a responsible official, whose information is provided above, must certify by signing below that the source is in compliance with each of the relevant requirements of this subpart.

- I am an existing source (Initial startup was before September 17, 2007) Date _____

If your source is an existing source, a responsible official, whose information is provided above, may certify below that the source is already in compliance with each of the relevant requirements of this subpart or certification may be done by March 11, 2011 in the Notification of Compliance Status as specified in 40 CFR Section 63.11175(b)

For existing sources: I am certifying below I will certify by March 11, 2011

(There is no need to sign below, you must sign a statement by March 11, 2011)

I certify the truth, accuracy, and completeness of this notification. The source has complied with all the relevant standards of this subpart. This initial notification also serves as the notification of compliance status.

Signature of responsible official: owner / operator (circle one) _____

Please Print Name Also _____

Brief Summary
New EPA regulations for Autobody Refinishing Shops
40 CFR Part 63 Subpart HHHHHH
August 2008

EPA has new requirements to reduce air pollution of metals such as chrome, lead, cadmium, manganese and nickel compounds, and also to reduce methylene chloride fumes, from autobody refinishing work. These compounds pose health risks to anyone who breathes the air when these fumes are present. Many paints used in autobody refinishing work contain these compounds. The new regulations require autobody shops and refinishing businesses to do several things to prevent these metals from getting into the air during spray painting.

This is a short summary of things an existing shop must do before January 2011. New autobody shops must do all these before beginning to paint. Although EPA has no requirements for hobbyists or private citizens, two things should be noted:

- The following are also good practices to improve the air for anyone exposed to autobody paint overspray.
- The new regulations strictly define what qualifies one as a hobbyist or private citizen when it comes to autobody painting

For more details and assistance, please talk to your local environmental contact. These web links to government contacts are a good place to start:

- http://www.epa.gov/ttn/atw/area/regional_contacts.pdf
- <http://www.smallbiz-enviroweb.org/contacts.aspx>

- 1) All spray painting must be done in a spray booth
 - Full cars must be painted in a spray booth with four walls, a roof and a ventilation system. (Filters in the booth have to remove at least 98% of the particulates. Your filter provider can give you the right filters and necessary paperwork.)
 - Parts of cars must be painted in a booth with at least three walls or flaps, a roof and a ventilation system that pulls air into the spray booth.
 - Spot repairs must be done in an enclosure which prevents any mist from getting out of the enclosure.
- 2) Painters must use spray guns and techniques which reduce overspray (such as HVLP).
- 3) All painters must receive training. Owners must keep records of the training of each painter.
 - For information on techniques and information your painters need to know and workshops available see the *Collision Repair Campaign* website with upcoming trainings -
 - <http://www.epa.gov/air/toxicair/community/collision.html>

- 4) Paint spray gun cleaning cannot create any mist of cleaning solvent to the air. You may spray solvent through the gun for cleaning purposes using an enclosed gun cleaner or you may clean the gun manually.
- 5) All shops must also send a notification to EPA with some general information by January 2010:
 - Location of facility
 - Description of spray painting equipment
 - Confirmation that shop has necessary equipment and training.
 - An example of this notification is found here:
http://www.epa.gov/ttn/atw/area/paint_strip_example.doc
- 6) Exemptions to the rule are facility maintenance activities, which include the application of coatings to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, and to pavements and curbs,
- 7) You can send this notice that you are an owner or operator, to your local EPA office. Your state is listed in the web link for your EPA office – http://www.epa.gov/ttn/atw/area/regional_contacts.pdf

Submit Initial Notification as follows:

- a. To the appropriate Regional Office of the EPA (see addresses below); and
- b. If the State has been delegated the authority for this regulation under section 112(l) of the Clean Air Act, submit the notification to the appropriate State agency found at the following link: <http://www.4cleanair.org/contactUsaLevel.asp>

Addresses of EPA Regional Offices:

EPA Region I (Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont), Director, Air, Pesticides and Toxics Division, One Congress Street, Suite 1100 (SEA), Boston, MA 02114, Attn: Air Compliance Clerk.

EPA Region II (New Jersey, New York, Puerto Rico, Virgin Islands), Director, Division of Enforcement and Compliance Assistance, 290 Broadway, New York, NY 10007-1866.

EPA Region III (Delaware, District of Columbia, Maryland, Pennsylvania, Virginia, West Virginia), Director, Air Protection Division, 1650 Arch Street, Philadelphia, PA 19103.

EPA Region IV (Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee), Director, Air, Pesticides and Toxics Management Division, Atlanta Federal Center, 61 Forsyth Street, Atlanta, GA 30303-3104.

EPA Region V (Illinois, Indiana, Michigan, Minnesota, Ohio, Wisconsin), Director, Air and Radiation Division, 77 West Jackson Blvd., Chicago, IL 60604-3507.

EPA Region VI (Arkansas, Louisiana, New Mexico, Oklahoma, Texas), Director, Air, Pesticides and Toxics, 1445 Ross Avenue, Dallas, TX 75202-2733.

EPA Region VII (Iowa, Kansas, Missouri, Nebraska), Director, Air, Air and Waste Management Division, U.S. Environmental Protection Agency, 901 N. 5th Street, Kansas City, KS 66101.

EPA Region VIII (Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming), Director, Air and Toxics Technical Enforcement Program, Office of Enforcement, Compliance and Environmental Justice, 1595 Wynkoop Street, Denver, CO 80202-1129.

EPA Region IX (Arizona, California, Hawaii, Nevada, American Samoa, Guam), Director, Air and Toxics Division, 75 Hawthorne Street, San Francisco, CA 94105.

EPA Region X (Alaska, Idaho, Oregon, Washington), Director, Office of Air, Waste and Toxics, 1200 6th Ave., Suite 900, AWT-107, Seattle, WA 98101.