

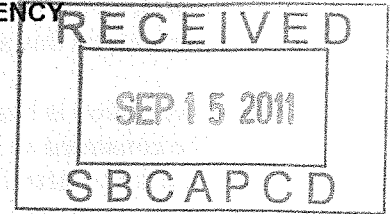


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

August 31, 2011



MFG

Mr. David Demarco
Instant Gratification, Inc. DBA Kwik Finish, ColorGuard Restoration
5348 Vegas Drive
Las Vegas, Nevada 89108

Dear Mr. Demarco,

The United States Environmental Protection Agency ("EPA") is in receipt of your letter dated April 25, 2011, in which you petition for an exemption from the National Emission Standard for Hazardous Air Pollutants (NESHAP) regulations for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, contained in 40 CFR Part 63, Subpart HHHHHH. Your petition concerns Instant Gratification, Inc., which also does business under the names Kwik Finish and ColorGuard Restoration, and which is based at 5348 Vegas Drive in Las Vegas, NV. Based on our communications, Instant Gratification performs motor vehicle and mobile equipment surface coating at customer sites throughout the United States; however, this petition concerns only operations performed within EPA Region 9 (Arizona, California, Hawaii, Nevada, and US Pacific Islands). Separate petitions for exemption would need to be sent to other EPA regions if you wish to be exempt from Subpart HHHHHH requirements in those areas.

To obtain an exemption, 40 CFR Section 63.11170(a)(2) requires that as the owner or operator of a motor vehicle surface coating operation you demonstrate, to EPA's satisfaction, that you spray apply no coatings that contain target Hazardous Air Pollutants (HAPs), as defined in Section 63.11180. The petition must include a description of the coatings that you spray apply and your certification that you do not spray apply any coatings containing the target HAPs.

Based upon the information provided in your petition and your signed certification that none of the coatings sprayed as part of your operations contain the target HAPs, EPA has determined that Instant Gratification, Inc. is exempt from Subpart HHHHHH requirements for its spray-applied coating activities.

Note that this exemption applies only to spray-applied coating activities. If Instant Gratification, Inc. performs other activities subject to Subpart HHHHHH, such as paint stripping using methylene chloride (MeCl), then your operations would still need to comply with applicable provisions of Subpart HHHHHH, including the requirement for submission of an initial notification letter describing those activities.

You must maintain a record of this exemption on site with your operations for as long as you perform motor vehicle and mobile equipment surface coating operations. If circumstances change such that you intend to spray apply coatings containing any target HAP, the owner or

operator must submit the initial notification required by Section 63.11175 and comply with the requirements of this subpart.

This exemption is based on information that you have provided to us. Nothing in this exemption shall be construed as limiting the ability of EPA or delegated agencies to pursue enforcement action, if it is determined that your operations were not eligible for this exemption or for any other violations under the Clean Air Act. Providing false information to a federal official is a criminal violation pursuant to federal law, 18 U.S.C. Section 1001.

If you have any questions regarding this response, please contact Joe Westersund of my staff at (415) 972-3841.

Sincerely,



Douglas K. McDaniel
Chief, Enforcement Office
Air Division

cc: All California air districts
Hawaii Department of Health
Nevada Division of Environmental Protection, Bureau of Air Pollution Control
Washoe County Air Quality Management Division
Clark County Department of Air Quality and Environmental Management
Arizona DEQ Air Quality Division
Maricopa County Air Quality Department
Pinal County Air Quality Control District
Pima County Department of Environmental Quality