



**Santa Barbara County  
Air Pollution Control District**

Our Vision  Clean Air

December 17, 2009

Attention: Auto Body Shops and Businesses Performing Paint Stripping and Miscellaneous Surface Coating

Re: Federal Regulation for Paint Stripping and Miscellaneous Surface Coating Operations  
National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart HHHHHH

To Whom It May Concern:

A new federal regulation is in place that affects auto body shops and businesses that spray-apply coatings to metal or plastic, or use methylene chloride to do paint stripping. The enclosed *Summary of Regulations Controlling Air Emissions from Paint Stripping and Miscellaneous Surface Coating Operations* contains important information about this regulation including who it applies to and its requirements.

Please be advised that if you are an existing business subject to the regulation, you must take action and submit an *Initial Notification* to the United States Environmental Protection Agency (USEPA) by the **January 11, 2010** deadline. Motor vehicle or mobile equipment surface coating operations that do not spray-apply coatings that contain compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd) may petition the USEPA for an exemption from this regulation.

Additional information regarding this federal regulation may be found on the APCD webpage here [www.sbcapcd.org/airtoxics/paintstripsco.htm](http://www.sbcapcd.org/airtoxics/paintstripsco.htm). An example *Initial Notification* letter and example *Petition for Exemption* letter are available on the APCD webpage. Information can also be found on the USEPA Area Source Rules webpage here [www.epa.gov/ttn/atw/area/arearules.html](http://www.epa.gov/ttn/atw/area/arearules.html).

This regulation is implemented directly by the federal government. For more information about this rule, please contact Periann Wood (415-947-4138, [wood.periann@epa.gov](mailto:wood.periann@epa.gov)) or Joe Westersund (415-972-3841, [westersund.joe@epa.gov](mailto:westersund.joe@epa.gov)) at USEPA Region 9. Correspondence can be sent to the address below.

U.S. EPA Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

Sincerely,

Michael Goldman, Manager  
Engineering & Compliance Division

enc: Summary of Regulations Controlling Air Emissions from Paint Stripping and Miscellaneous Surface Coating Operations

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## 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:

Address	States	Website/ Phone Number
Region 1 1 Congress Street Suite 1100 Boston, MA 02114-2023	CT, MA, ME, NH, RI, VT	<a href="http://www.epa.gov/region1">www.epa.gov/region1</a> (888)372-7341 (617) 918-1650
Region 2 290 Broadway New York, NY 10007-1866	NJ, NY, PR, VI	<a href="http://www.epa.gov/region2">www.epa.gov/region2</a> (212) 637-4023
Region 3 1650 Arch Street Philadelphia, PA 19103-2029	DE, MD, PA, VA, WV, DC	<a href="http://www.epa.gov/region3">www.epa.gov/region3</a> (215) 814-2068
Region 4 Atlanta Federal Center 61 Forsyth Street, SW Atlanta, GA 30303-8960	FL, NC, SC, KY TN, GA, AL, MS	<a href="http://www.epa.gov/region4">www.epa.gov/region4</a> (404) 562-9131 (800) 241-1754
Region 5 77 West Jackson Blvd. Chicago, IL 60604-3507	IL, IN, MI, WI, MN, OH	<a href="http://www.epa.gov/region5">www.epa.gov/region5</a> (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	<a href="http://www.epa.gov/region6">www.epa.gov/region6</a> (800) 887-6063* (214) 665-7250 (214) 665-7224
Region 7 901 North Fifth Street Kansas City, KS 66101	IA, KS, MO, NE	<a href="http://www.epa.gov/region7">www.epa.gov/region7</a> (800) 223-0425 (913)-551-7003
Region 8 1595 Wynkoop St. Denver, CO 80202-1129	CO, MT, ND, SD, UT, WY	<a href="http://www.epa.gov/region8">www.epa.gov/region8</a> (800) 227-8917* (303) 312-6460
Region 9 75 Hawthorne Street San Francisco, CA 94105	CA, AZ, HI, NV, GU, AS, MP	<a href="http://www.epa.gov/region9">www.epa.gov/region9</a> (415) 947-8715
Region 10 1200 6 <sup>th</sup> Ave. Suite 900, AWT-107 Seattle, WA 98101	AK, ID WA, OR	<a href="http://www.epa.gov/region10">www.epa.gov/region10</a> (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](http://www.epa.gov/ttn/atw/area/table_state_contacts.doc) or,  
<http://www.4cleanair.org/contactUsaLevel.asp>

United States  
Environmental Protection  
Agency

April 2008

[www.epa.gov/ttn/atw/eparules.html](http://www.epa.gov/ttn/atw/eparules.html)

Office of Air Quality Planning & Standards (EI 43-02)



# 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.