

## Questions and Answers

### Kansas SBEAP Webinars – January 22, 2009 and February 18, 2009

#### 6H Area Source Rule for Paint Stripping and Miscellaneous Surface Coating Operations

**1. How do you define compensation?**

There is no definition of compensation associated with the rule. Since it is not defined further, it usually means payment with money and not by bartering or trading services. Compensation by bartering or trading services or some other similar scenario would be difficult to prove. In other abstract situations like this, U.S. EPA headquarters would only make a clarification if they received some concrete example(s) as part of a formal request for a determination.

**2. Are art studios considered laboratories?**

Art studios are not considered laboratories; therefore, not exempt based on that definition.

**3. If you have a spray booth in a current art building, which will be moved to the new art building. Are you a new source or an existing source?**

Assuming this facility meets the definition of an affected source, the new paint booth is an existing source if painting or paint stripping occurred on September 17, 2007 or prior to this date.

**4. Will you repeat what exemptions are exclusions pertaining to aerospace?**

The approved spray gun technologies are not required if coating an aerospace vehicle

- For components that normally require use of airbrush or extensions to reach limited access areas
- With coatings that contain fillers that adversely affect atomization with HVLP
- With coatings that have dried film thickness of less than 0.0013 cm (0.0005 in)

**5. I work for another State's SBEAP program. Is it okay to distribute these presentations (6C, 6H) to the public?**

Yes. The presentations were based on the Federal regulations and do not contain state-specific requirements.

**6. Before archiving, could you add information in the slides that states where an EPA interpretation or slide is located?**

Yes, this is pointed out in slide #11.

**7. Also, is it ok to post these presentations on our website?**

Yes. Those contributing to the 6H slides include Renee Bashel, Wisconsin SBEAP; Holly Wilson, U.S. EPA OAQPS; and EPA Region 7.

**8. Who do we send initial notifications to?**

Facilities should check with their regional EPA office, state air program, and city air program, if one exists. Kansas facilities should send notifications to EPA Region 7 **and** KDHE. Addresses are as follows:

**EPA Mailing Address:**

USEPA Region 7  
Air Permitting and Compliance Branch  
901 N 5<sup>th</sup> Street  
Kansas City, KS 66101  
913-551-7003

**KDHE Mailing Address:**

KDHE Bureau of Air  
1000 SW Jackson, Suite 310  
Topeka, KS 66612-1366  
785-296-1570

**9. I have a question on the exemptions slide. Does the exemption given to facilities owned or operated by NASA also apply to facilities performing these operations to provide hardware, etc to EPA?**

Only if the facilities perform paint stripping or surface coating at the installation owned or operated by NASA.

**10. Where can I find the petition for exemption template?**

There is a template and an example completed petition form available at [www.sbeap.org/workshops/viewworkshop/21](http://www.sbeap.org/workshops/viewworkshop/21). Note the template is not required but all requested information found in 40 CFR Part 63 Subpart HHHHHH (Parts 63.11169 – 63.11180 and Table 1) must be submitted.

**11. Does this rule apply on wood/timber surfaces?**

It applies to paint stripping operations that use methylene chloride (MeCl) to remove dried paint from various types of surfaces including wood, metal, and plastic. It does not apply to spray applying paints to wood surfaces.

**12. The rule is applicable to facilities performing stripping and surface coating on aviation rework facilities, correct?**

Yes, if they are an area source stripping with MeCl or if they spray applying a coating containing a targeted HAP.

**13. Who will certify the personnel or people who spray on surface coatings?**

There is not a designated body to certify or approve training programs. The minimum requirements for training are described in §63.11173. The training requirements do not specify that any one training provider or program must be used. The rule allows flexibility for the best training environment and certification process that an owner or operator can identify for their particular work site that meets the requirements in the final rule. For example, the rule allows for in-house training programs and for an owner of a facility to certify successful completion of such a training program. However, it remains the prerogative of the state to specify more stringent training requirements than EPA has included in the rule.

**14. Will we get a copy of your slides?**

Slides were sent by e-mail to all who registered. They are also archived at this site, [www.sbeap.org/workshops/viewworkshop/21](http://www.sbeap.org/workshops/viewworkshop/21).