

Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

NESHAP Subpart HHHHHH

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Kansas Small Business Environmental Assistance Program

November 10, 2010; 10-11 CST

Paid for, in part, by the Kansas Department of Health and Environment

Webinar logistics

- You will not be able to speak during the Webinar.
- Trouble hearing? If it's not your computer volume, please use your telephone. Click on the phone icon and dial the number/pin given.
- Questions? Type in long text box at the bottom left of the screen and pressing enter.
- The presentation and questions will be archived. Access instructions and survey will be sent by e-mail.
- Certificates of attendance available as documentation for training.



Overview

- Who's SBEAP?
- Area source background
- Training requirements of 6H
- Affected sources and activities
- Who's new, who's existing
- Compliance due dates
- Operation requirements
- Recordkeeping requirements
- Notification and reporting requirements
- Resources

Small Business Environmental Assistance Program

- Environmental compliance assistance
- Multimedia [air (mostly), waste, water, energy, GHG inventory and reporting, and EMS]
- Free to small- and medium-sized businesses (KDHE funded)
- Confidential
- Staff located throughout the state
- Contact information
 - Web site: www.sbeap.org
 - Hotline: 800-578-8898
 - E-mail: sbeap@ksu.edu



Small Business Environmental Assistance Program

- Environmental hotline (800-578-8898)
- On-site visits
- Targeted regulatory or industry-specific workshops
- Publications (hard copy or electronic)
 - Fact sheets, manuals
 - E-tips (sign up at www.sbeap.org/newsletters.php)
 - Web-based resources and training: www.sbeap.org



Upcoming learning opportunities

- Webinar—A Better Place for Pharmacy Waste – Dec. 8, 2010, 10:00-11:30 a.m. CST

Sign up at www.sbeap.org



Area Source Rules Background

- NESHAP – National Emission Standards for Hazardous Air Pollutants
 - **major** source – facility emits or has PTE at least 10 tons/yr single HAP or 25 tons/yr combinations of HAPs
 - **area** source – not a **major** source
 - www.epa.gov/ttn/atw/area/arearules.html
- CAA requires EPA to ID 30 most toxic HAPs in urban areas
- CAA requires EPA to ID **area** source categories representing 90% of emitters of these “Urban Dirty Thirty”



Affected Area Sources

- Paint stripping operations using methylene chloride (MeCl) to remove dried paint
 - Wood, metal, plastic or other substrates
- ***Motor vehicle**** and ***mobile equipment**** surface coating operations (spray-applied)
 - Includes mobile refinishing operations
 - Includes individuals coating more than 2 vehicles in a year
- Spray application of coatings containing Cr, Pb, Mn, Ni, or Cd (target HAPs) to any metal or plastic parts or products that are not motor vehicles or mobile equipment

* Definition in next slide



Training Requirements for Motor Vehicle, Mobile Equipment and Misc Surface Coating

- Painters must be certified as completing training in proper spray application of surface coatings, setup, and maintenance of spray equipment
 - Certified by owner or operator
 - No designated body to certify or approve training
 - In-house training allowed
 - States could have more stringent requirements
(except students of accredited surface coating training program under the direct supervision of certified instructor)



Requirements for Motor Vehicle, Mobile Equipment and Misc Surface Coating

- All personnel who spray apply coatings (including contractors) must be trained
 - Initial training
 - NEW facility – within 180 days of hire date or January 9, 2008, whichever is later
 - EXISTING facility – within 180 days of hire date or January 10, 2011, whichever is later
 - Existing personnel can use training that took place up to five years prior to the 180-days date, if it met elements of training program required in the rule
 - Refresher training
 - At least once every five years following initial training date



Requirements for Motor Vehicle, Mobile Equipment and Misc Surface Coating

- Four elements of training program:
 1. Spray gun equipment selection, set up, and operation
 - Measuring coating viscosity, selecting proper fluid tip or nozzle, achieving proper spray pattern, air pressure and volume, and fluid delivery rate
 2. Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray
 - Maintaining correct spray gun distance and angle to the part, using proper banding and overlap, reducing lead and lag spraying
 3. Routine spray booth & filter maintenance, filter selection and installation
 4. Environmental compliance with requirements of the NESHAP



CERTIFICATE OF ATTENDANCE

DAN-AM / SATA TECHNICAL TRAINING

On October 1st, 2009, **Eric Edwards** has successfully completed the Dan-Am/SATA Technical Training Course.

In this Training Course, the following subjects were covered:

- **EPA Rule 40 Part 63 Painter Requirements**
- Spray gun setup and usage
- Spray gun maintenance
- Hands on practical use of HVLP and RP Equipment
- Cycle time reductions and improving productivity with correct equipment and usages
- Air volume requirements
- Air filtration and filter maintenance
- Supplied air respiration
- CO Monitor requirements
- Spot Repair Procedure
- RPS Cups
- New trends in Automotive Painting

The training was provided by Jeffrey Poor and David Pulsifer, on behalf of SATA Spray Equipment, and the Dan-Am Company. The training course was sponsored by Don Kennett Inc. in St. Manchester, NH.

Steve Treutel

Director of Industry Relations & Training

Jeffrey Poor

Territory Manager

Dan-Am Co.[®]

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One Sata Drive, Spring Valley, MN 55975
800.533.8013

SATA

Spray Equipment

Sample of 3rd
Party
Training
Certification



Requirements for Motor Vehicle, Mobile Equipment and Misc Surface Coating

- Owner or operator must certify training of each person was completed
- Certification must include:
 - List of personnel who are required to be trained, with name and job description
 - Hands-on and classroom instruction, covering elements of training program
 - Description of methods used at completion of initial or refresher training to demonstrate successful completion



Affected Area Sources

- Paint stripping operations using methylene chloride (MeCl) to remove dried paint
 - Wood, metal, plastic or other substrates
- **Motor vehicle*** and **mobile equipment*** surface coating operations (spray-applied)
 - Includes mobile refinishing operations
 - Includes individuals coating more than 2 vehicles in a year
- Spray application of coatings containing Cr, Pb, Mn, Ni, or Cd (target HAPs) to any metal or plastic parts or products that are not motor vehicles or mobile equipment

* Definition in next slide

Important Definitions

- ****Motor vehicle*** – any self-propelled vehicle, including automobiles, light duty trucks, golf carts, vans, and motorcycles.
- ****Mobile equipment*** – any device that may be drawn and/or driven on a roadway including, but not limited to, heavy-duty trucks, truck trailers, fleet delivery trucks, buses, mobile cranes, bulldozers, street cleaners, agriculture equipment, motor homes, and other recreational vehicles (including camping trailers and fifth wheels).
- ***Miscellaneous parts and/or products*** – any part or product made of metal or plastic, or combinations of metal and plastic. Include, but are not limited to, metal and plastic components of the following types of products as well as the products themselves: motor vehicle parts and accessories for automobiles, trucks, recreational vehicles; automobiles and light duty trucks at automobile and light duty truck assembly plants; boats; sporting and recreational goods; toys; business machines; laboratory and medical equipment; and household and other consumer products.



Target HAPs

- Compounds of Cr, Pb, Mn, Ni, or Cd
- Present at 0.1% by mass or more for OSHA-defined carcinogens (Cr+6, Pb, Ni, and Cd)
- Present at 1.0% by mass or more for other target HAP compounds (Cr+3 and Mn)



How to Get Excluded

- Owner or operator of motor vehicle or mobile equipment spray-applied surface coating operation may:
 - Petition EPA for exemption
 - Certify no target HAPs used in spray coatings
 - Provide description of coatings used
 - If use target HAP later, submit initial notification and comply with Subpart requirements
 - Exemption template available at www.sbeap.org/aqrules



Sources NOT Affected

- Surface coating or paint stripping
 - performed at installations owned or operated by Armed Forces, NASA, or National Nuclear Security Administration
 - of military munitions manufactured by or for the Armed Forces or equipment used or transport military munitions
 - performed by individuals on personal vehicles, possessions, or property as a hobby or maintenance, or done by individual for others without compensation (2 or less/yr)
- Any major source



Sources NOT Affected (cont.)

- Research and laboratory activities
- Quality control activities
- Activities specifically covered by any other area source
NESHAP
- *Facility maintenance** activities

* Definition in next slide

Important Definitions

****Facility maintenance*** also includes the refinishing of mobile equipment in the field or at the site where they are used in service and at which they are intended to remain indefinitely after refinishing. Such mobile equipment includes, but is not limited to, farm equipment and mining equipment for which it is not practical or feasible to move to a dedicated mobile equipment refinishing facility. Such mobile equipment also includes items, such as fork trucks, that are used in a manufacturing facility and which are refinished in that same facility.



Activities Included

- Affected sources might have one or more
 - Mixing rooms and equipment
 - Spray booths, ventilated prep stations, curing ovens and associated equipment
 - Spray guns and associated equipment
 - Spray gun cleaning equipment
 - Equipment used for storage, handling, recovery, or recycling of cleaning solvent or waste paint
 - Equipment used for paint stripping at paint stripping facilities using strippers that contain MeCl



Activities NOT Included

- Not considered spray-applied applications:
 - Using hand-held device with a cup capacity $<$ or $=$ 3.0 fluid oz (89 cc)
 - Powder coating
 - Hand-held, non-refillable aerosol containers
 - Non-atomizing technology
 - Thermal spray operations using solid metallic or non-metallic materials



Activities NOT Included (cont.)

- Affected coatings do not include:
 - Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination
 - Paper film or plastic film that may be pre-coated with adhesive
 - Adhesives, sealants, maskants, or caulking materials
 - Temporary protective coatings, lubricants, or surface preparation materials
 - In-mold coatings that are spray-applied in the manufacture of reinforced plastic composite parts



New or Existing Source?

- New Sources
 - Began construction of source **after September 17, 2007** by installing new paint stripping or surface coating equipment (existing source that purchased and installed paint booths, enclosed spray gun cleaners, added paint stripping equipment to reduce MeCl emissions, or purchase spray guns to comply with the rule is not NEW) AND
 - New affected equipment where the source was not previously engaged in the activity
- Reconstructed (defn 40 CFR 63.2)
- Existing Sources = not new



Compliance Dates

- New sources – **January 9, 2008** or date of initial startup of affected source, whichever is later
- Existing sources – **January 10, 2011**

General Requirements Paint Stripping

- Am I using chemical stripping agents that contain Methylene Chloride (MeCl) also known as Dichloromethane (DCM)?? How can I tell?? MSDSs!!!
- Minimize emissions of MeCl using the following management practices
 - evaluate each application for need to remove paint (e.g. can part be re-coated)
 - evaluate each application for alternative to MeCl
 - reduce exposure of MeCl strippers to air
 - optimize conditions when using MeCl to reduce evaporation (e.g., if heating, use lowest possible temperature)
 - use proper storage and disposal techniques



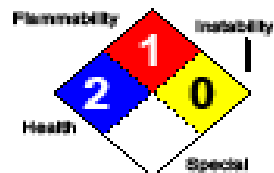
Example of Chemical Stripping Agent containing MeCl



HINT: Don't look for MeCl as the product name... MeCl or DCM will be listed either in MSDS or ingredients list.

Aircraft Remover

HEALTH	2	
FLAMMABILITY	1	
PHYSICAL HAZ.	1	
PPE	B	



Printed: 01/25/2006
Revision: 04/22/2005

Date Created: 04/19/2005

1. Product and Company Identification

Product Code: GAR343
 Product Name: Aircraft Remover
 Manufacturer Information
 Company Name: W. M. Barr
 2105 Channel Avenue
 Memphis, TN 38113
 Phone Number: (901)775-0100
 Emergency Contact: 3E 24 Hour Emergency Contact (800)451-8346
 Information: W.M. Barr Customer Service (800)398-3892
 Web site address: www.wmbarr.com
 Preparer Name: Barry Henson 901-775-0100 Ext. 252

2. Composition/Information on Ingredients

Hazardous Components (Chemical Name)	CAS #	Percentage	OSHA TWA	ACGIH TWA	Other Limits
1. Dichloromethane	75-09-2	60.0 -90.0 %	25 ppm	50 ppm	
2. Methanol	67-56-1	2.0 -10.0 %	200 ppm	200 ppm	
3. Tall Oil Acostx	NA	1.0 -5.0 %			
4. POLY(OXY-1,2-ETHANEDIYL), .ALPHA.-(NONYLPHENYL)-.OMEGA.-HYDR	9016-45-9	1.0 -3.0 %			
5.	NA	1.0 -10.0 %			
6. Ammonium hydroxide	1336-21-6	5.0 -15.0 %			
Hazardous Components (Chemical Name)	CAS #	OSHA STEL	OSHA CEIL	ACGIH STEL	ACGIH CEIL
1. Dichloromethane	75-09-2	125 ppm (15 min)			
2. Methanol	67-56-1			250 ppm	
3. Tall Oil Acostx	NA				
4. POLY(OXY-1,2-ETHANEDIYL), .ALPHA.-(NONYLPHENYL)-.OMEGA.-HYDR	9016-45-9				
5.	NA				
6. Ammonium hydroxide	1336-21-6				

3. Hazards Identification

Emergency Overview

General Requirements Paint Stripping

- **If operation uses > 1 ton of MeCl per year**
 - **Develop, implement & post a written MeCl minimization plan**
- **If operation uses ≤ 1 ton of MeCl**
 - **no written plan is required, but must comply with minimization management practices**





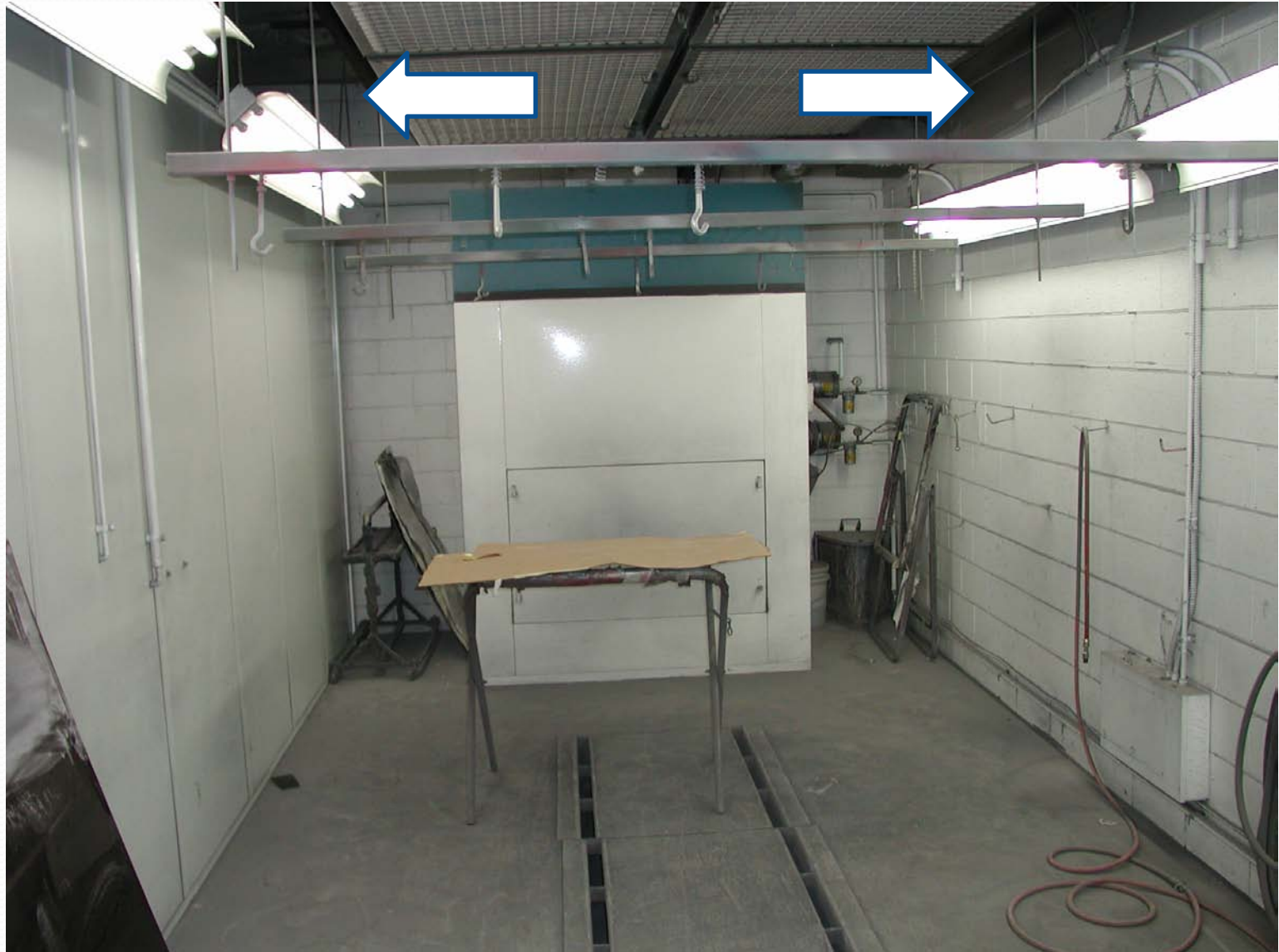
Requirements for Motor Vehicle, Mobile Equipment and Misc Surface Coating

- Coatings applied in
 - spray booth
 - preparation station
 - mobile enclosure
- Filter system with 98% collection efficiency



Requirements for Motor Vehicle, Mobile Equipment and Misc Surface Coating

- Booths and prep stations for **complete motor vehicles** or **mobile equipment** must have
 - Full roof
 - Four walls or side curtains
 - Ventilated at negative pressure (cross-draft)OR if fully enclosed and completely sealed
 - Downdraft booth (= or < 0.05 inches water gauge positive pressure)





Requirements for Motor Vehicle, Mobile Equipment and Misc Surface Coating

- Booths and prep stations for **miscellaneous coating** or **vehicle subassemblies** must have
 - Full roof
 - Three walls or side curtains(Roof and walls may have openings for conveyors)
 - Ventilated so air is drawn into booth



Requirements for Motor Vehicle, Mobile Equipment and Misc Surface Coating

- Mobile enclosures for spot repairs
 - Enclose and seal against surface being coated such that paint overspray is retained in enclosure and directed to the filter

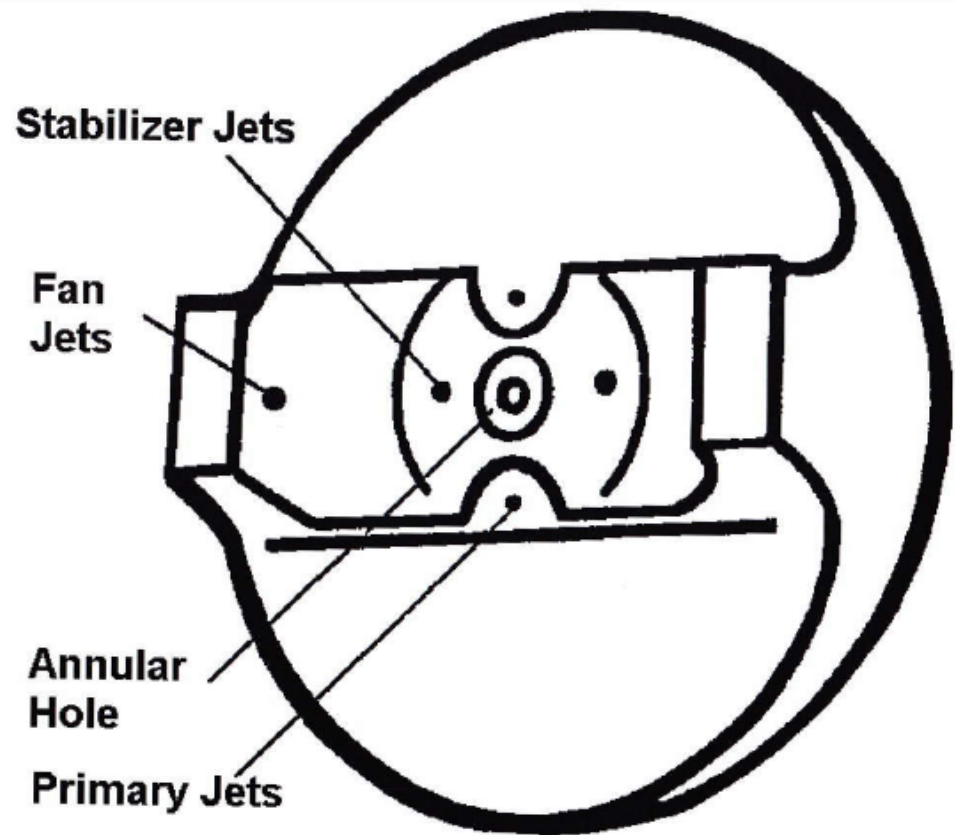


Requirements for Motor Vehicle, Mobile Equipment and Misc Surface Coating

- Spray-applied coatings must be applied with one of the following gun technologies:
 - High volume, low pressure (HVLP)
 - Electrostatic
 - Airless
 - Air-assisted airless
 - Other with equivalent transfer efficiency (need written approval from EPA)

HVLP

HVLP spray equipment is spray equipment that is permanently labeled as such and used to apply any coating by means of a spray gun which is designed and operated between 0.1 and 10 pounds per square inch gauge (psig) air atomizing pressure measured dynamically at the center of the air cap and at the air horns.





Requirements for Motor Vehicle, Mobile Equipment and Misc Surface Coating

- Spray gun cleaning operations should prevent atomized mist or avoid spraying cleaning solvent and paint residue outside container used to collect waste solvent
 - Acceptable options include
 - Hand cleaning of disassembled gun
 - Flush gun with solvent, without spraying
 - Use fully enclosed gun washer
 - Combination of non-atomizing methods



Recordkeeping

- **Paint stripping**

- List of the materials used that contain MeCl, their MeCl content, and annual usage of MeCl
- Copy of minimization plan kept on site, if using more than one ton of MeCl in calendar year
 - Including annual review and updates to plan
- Records of any deviations from rule requirements
 - Date and time period it occurred
 - Description of deviation
 - Corrective actions taken



Recordkeeping

- **Surface coating**
 - Painter training certification
 - Documentation of filter efficiency
 - If spray gun does not meet definition of acceptable technologies and has cup capacity at least 3.0 oz, need documentation from spray gun manufacturer that Administrator has determined equivalent transfer efficiency
 - Copies of all notifications and reports required
 - Records of any deviations from requirements in the rule
 - Date and time period it occurred
 - Description of deviation
 - Corrective actions taken



Notification and Reporting

- Initial Notification
 - NEW sources must submit by July 7, 2008 or no more than 180 days after start up
 - EXISTING sources must submit no later than January 11, 2010
 - Form available on Web: www.sbeap.org/aqrules



Notification and Reporting

- Initial Notification includes:
 - Company name
 - Owner/operator name, title, street address, phone, e-mail (if available), and signature
 - Street address for location of compliance records, if different from source
 - Identify NESHAP: 40 CFR part 63, subpart HHHHHH
 - Description of operations
 - Motor vehicle or mobile equipment, or miscellaneous surface coating; number of prep stations and paint booths; number of painters employed
 - Paint stripping operation; methods of paint stripping employed (e.g., chemical, mechanical); substrates stripped (e.g., wood, plastic, metal)



Notification and Reporting

- Initial Notification (cont.)
 - Paint strippers must indicate whether more than one ton of MeCl will be used after compliance due date
 - Statement of whether source is in compliance or will be brought into compliance by compliance due date
 - For new sources, initial notification is the notification of compliance status
 - For existing sources, initial notification MAY be used as notification of compliance status if already in compliance and avoid the second notification



Notification and Reporting

- Notification of Compliance Status
 - Existing sources not able to demonstrate compliance in the initial notification must submit this notification by March 11, 2011
 - Include same basic information as initial notification
 - Statement of whether the source has complied with all the relevant standards and other requirements, or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance.
 - Indicate date of compliance with all relevant requirements
 - Paint stripping sources using more than one ton of MeCl in a year must certify they have written and are implementing their minimization plan



Notification and Reporting

- Annual Notification of Changes Report
 - Sources must submit a report if compliance status changed during the previous year
 - Changes include paint stripping sources that increase usage of MeCl to more than one ton in a calendar year
 - Submit the changes report by March 1 following the year usage went over one ton of MeCl
 - Develop and implement a written minimization plan by December 31
 - Submit a notification of compliance status by March 1 of the following year

Resources

http://www.epa.gov/collisionrepair/

U.S. ENVIRONMENTAL PROTECTION AGENCY



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Collision Repair Campaign

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EPA developed the Collision Repair Campaign to focus on meaningful risk reduction in the Collision Repair source sector to complement our ongoing community air toxics work and attain reductions at a faster rate. The Campaign will also serve as an opportunity for shops to work towards early compliance with the Auto Body Rule.

[Basic Information](#) - Goals, health impacts, and benefits of the Campaign.

[Announcements](#) - The latest news about the collision repair campaign

[Regional Campaign Projects](#) - Descriptions of projects happening around the country.

[Tools and Resources](#) - Resources providing information about various areas of the Auto Body industry, including best management practices, technical assistance, and some videos about the industry.

[Training](#) - Current and past training available.



Upcoming Training

- **New!** On-line Training Series for Auto Body Shops
Nov/Dec 2010

Auto Body Rule

- [Final rule \(PDF\)](#) (15pp, 92k)
- [Brochure summarizing rule \(PDF\)](#) (2pp, 70k)
- [Example Initial Notification \(PDF\)](#) (4pp, 23k)
- [Example Petition for Exemption \(PDF\)](#) (5pp, 65k)
- [Example Notification of Compliance Status \(PDF\)](#) (5pp, 41k)
- [Training Checklist \(PDF\)](#) (2pp, 20k)
- [State Delegations \(PDF\)](#) (2pp, 21k)

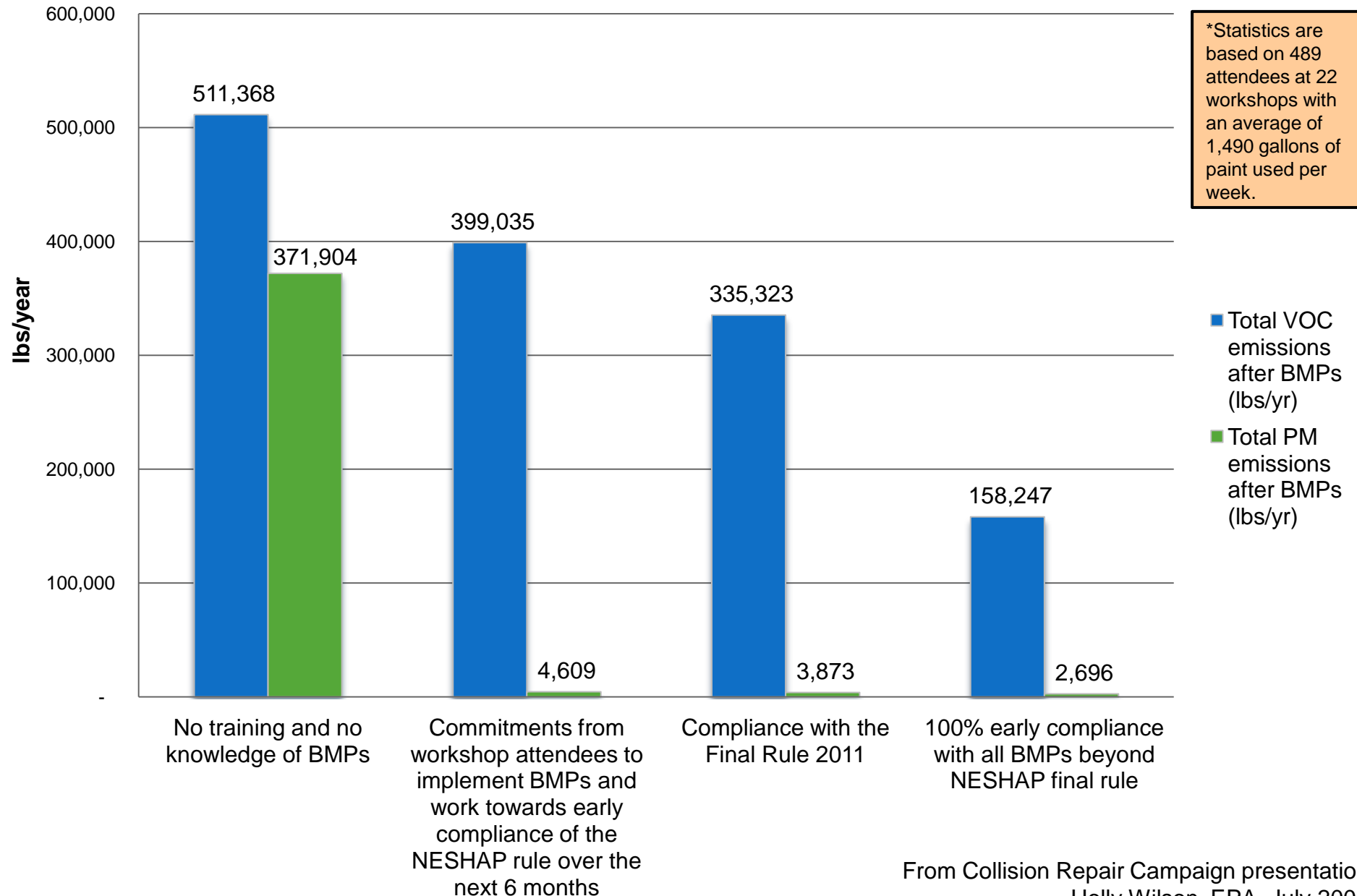
Now Available

- [Materiales del Outreach en español](#)
- [Training DVD and Poster](#)
- [Training Video](#)

VOC and PM Emissions after Best Management Practices



*Statistics are based on 489 attendees at 22 workshops with an average of 1,490 gallons of paint used per week.

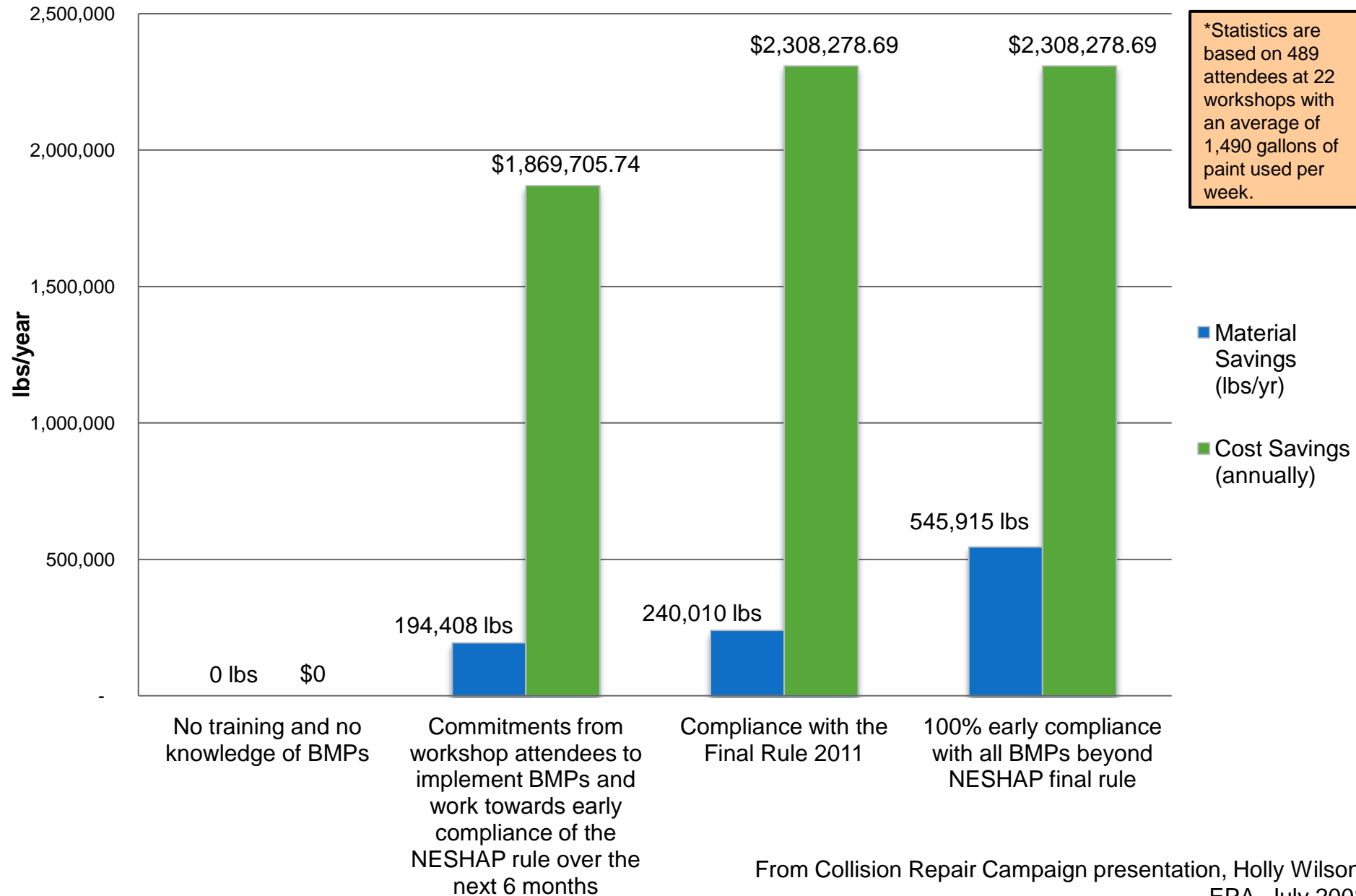


From Collision Repair Campaign presentation
Holly Wilson, EPA, July 2008
(recreated by SBEAP)

Material Savings and Cost Avoidance



*Statistics are based on 489 attendees at 22 workshops with an average of 1,490 gallons of paint used per week.

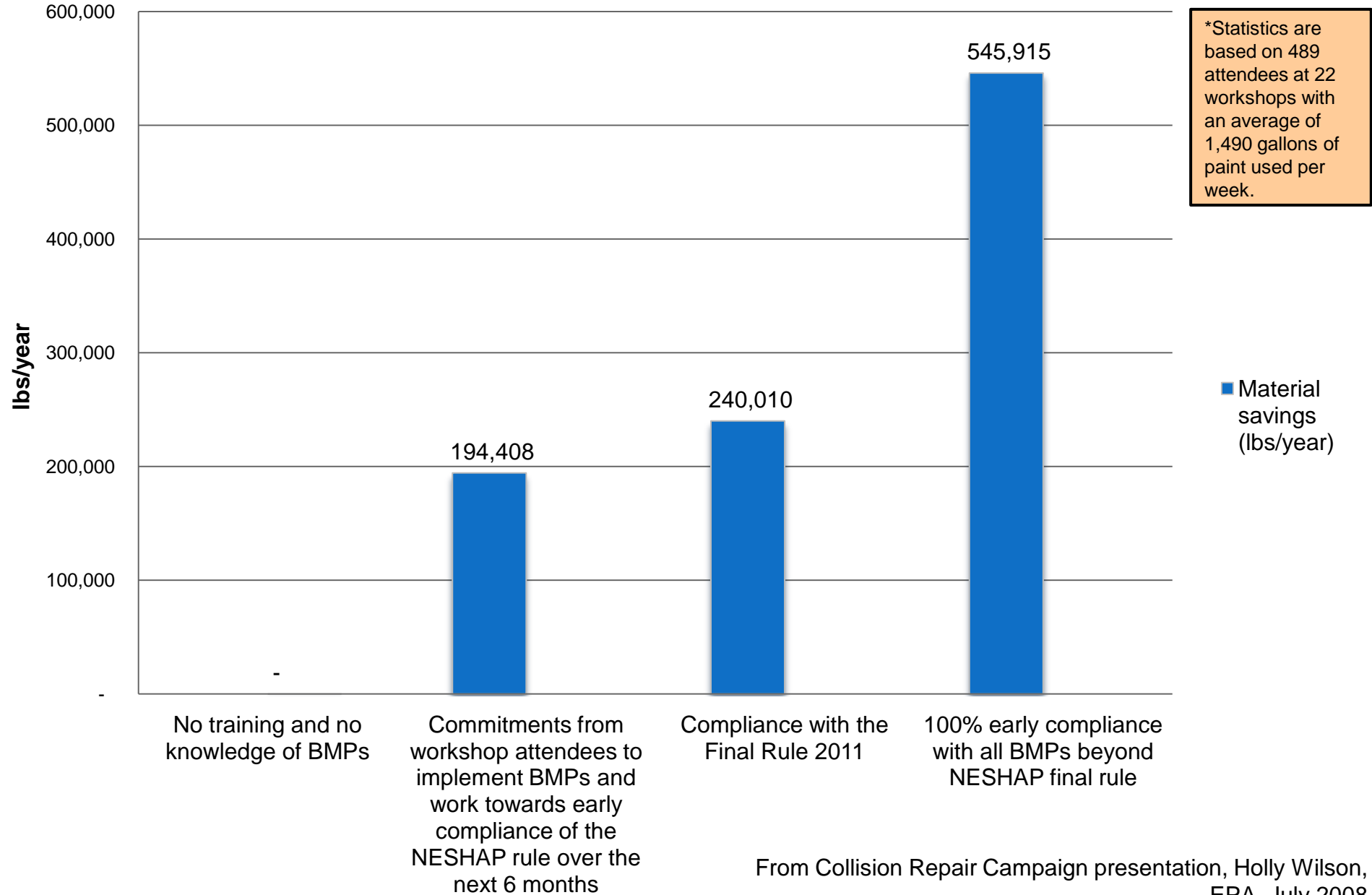


From Collision Repair Campaign presentation, Holly Wilson, EPA, July 2008 (recreated by SBEAP)



Material Usage Reduction (lbs/year)

*Statistics are based on 489 attendees at 22 workshops with an average of 1,490 gallons of paint used per week.



From Collision Repair Campaign presentation, Holly Wilson, EPA, July 2008 (recreated by SBEAP)

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	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) 814-2068
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 6th 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>

United States
Environmental Protection
Agency

April 2008

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.

For more information

- www.epa.gov/ttn/atw/area/arearules.html - EPA's Air Toxics Website for Area Source Standards
- www.epa.gov/dfe/pubs/projects/auto/index.htm - DfE Website
- www.ccar-greenlink.org - OECA's Coordinated Committee for Auto Repair – an Automotive Sector Compliance Assistance Center
- www.paintcenter.org/paintstripping.cfm - OECA's Paints & Coatings Resource Center
- www.smallbiz-enviroweb.org/Compliance/NewRules/PaintStripping.aspx - Small Business Environmental Home Page

In Summary



HHHHHH Affected Sources

1. Paint stripping operations using methylene chloride (MeCl) to remove dried paint from wood, plastic, metal or other substrates
2. Spray-applied surface coating operations on motor vehicles and mobile equipment
 - including both stationary operations at fixed locations, and mobile repair and refinishing operations
3. Spray-applied surface coating operations on other metal or plastic parts or products with coatings containing target HAPs
 - i.e. Cr, Pb, Mn, Ni, or Cd



New Sources

- A source is only new if it commenced construction after September 17, 2007 by installing new paint stripping or surface coating equipment, and it had no paint stripping or miscellaneous surface coating activity prior to that date



Compliance Dates

- New sources must be in compliance by January 9, 2008 or by initial startup thereafter
 - New sources submit initial notification by July 7, 2008 or 180 days after initial startup thereafter
- Existing sources must be in compliance by January 10, 2011
 - Existing sources submit initial notification by January 11, 2010



Most Important Exemptions

- Hobby exemption
- Exemption by petition
- Use of 3 oz cup or less
- Facility maintenance exemption



Basic HHHHHH Compliance

- Paint stripping
 1. Minimize MeCl emissions
 2. Written plan for > 1 ton MeCl annual usage
- Spray-applied surface coating
 1. Apply in filtered enclosure
 2. HVLP guns or equivalent
 3. Limit spray gun cleaning overspray
 4. Painter training

Questions or comments?

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