

## 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 40 CFR part 63, 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 for each calendar year in which any reportable changes occurred.

### 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 Safety Data Sheets.
- 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 5 Post Office Square Suite 100 Boston, MA 02109-3912	CT, MA, ME, NH, RI, VT	<a href="http://www.epa.gov/region1">www.epa.gov/region1</a> (617) 918-1650 (888) 372-7341
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 Four Penn Center 1600 JFK Blvd. Philadelphia, PA 19103-2029	DC, DE, MD, PA, VA, WV	<a href="http://www.epa.gov/region3">www.epa.gov/region3</a> (215) 814-2068 (800) 438-2474
Region 4 Atlanta Federal Center 61 Forsyth Street, SW Atlanta, GA 30303-3104	AL, FL, GA, KY, MS, NC, SC, KY TN	<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 (800) 621-8431
Region 6 1201 Elm Street Suite 500 Dallas, TX 75270	AR, LA, NM, OK, TX	<a href="http://www.epa.gov/region6">www.epa.gov/region6</a> (214) 665-7250 (214) 665-7224 (800) 887-6063
Region 7 11201 Renner Blvd. Lenexa, KS 66219	IA, KS, MO, NE	<a href="http://www.epa.gov/region7">www.epa.gov/region7</a> (913)-551-7003 (800) 223-0425
Region 8 1595 Wynkoop Street Denver, CO 80202-1129	CO, MT, ND, SD, UT, WY	<a href="http://www.epa.gov/region8">www.epa.gov/region8</a> (303) 312-6460 (800) 227-8917
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 (866) 372-9378
Region 10 1200 Sixth Ave. Suite 155 Seattle, WA 98101	AK, ID WA, OR	<a href="http://www.epa.gov/region10">www.epa.gov/region10</a> (206) 553-6220 (800) 424-4372

## For More Information

Copies of the rule and other materials are located at:  
<https://www.epa.gov/stationary-sources-air-pollution/paint-stripping-and-miscellaneous-surface-coating-operations>

For more information on state requirements, please contact your state representatives.



# 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 EPA 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). In the alternative, you may submit notification to the Administrator that you do not spray-apply any coatings that contain those compounds.

### 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 more than 1 ton MeCl annual usage, develop and implement a written MeCl minimization plan. No implementation plan is needed if usage is less than 1 ton MeCl; however, sources must still utilize work practices to minimize emissions of MeCl. Consult the Safety Data 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, 40 CFR part 63, 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 and at least three complete walls or side curtains, and they must be 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. Estimated for the 2008 rule was that 1,000 facilities would 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. Estimated for the 2008 rule was that < 25% of existing facilities would 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.