

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) 814-2746
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 6 th 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).

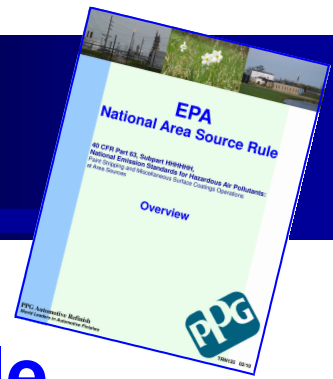
What Am I Required To Do?

- 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.









6H National Area Source Rule

Did you know that you have a choice with PPG ?

Comply with the regulation, or file for exemption by using Heavy Metal Free PPG products. You make the choice!

Requirements:

Compliance	*Exemption
<ol style="list-style-type: none"> 1. Register your facility with the EPA. 2. Spray coatings in a controlled environment: <ol style="list-style-type: none"> a. <i>This may require shop/booth modifications.</i> 3. Use HVLP or equivalent spray equipment. 4. Use an enclosed spray gun cleaner. 5. Painter training, and <u>every 5 years thereafter!</u> 6. <u>Ongoing</u> booth filter efficiency record keeping. 7. <u>Ongoing</u> spray gun transfer efficiency record keeping. 8. <u>Ongoing</u> painter training record keeping. 	<ol style="list-style-type: none"> 1. Use Heavy Metal Free PPG Products!!! <ol style="list-style-type: none"> a. See list of products on PPG Refinish website: www.ppgrefinish.com 2. Contact your local EPA office to obtain exemption filing forms. 3. Continue to use only PPG heavy metal free products ongoing after exemption is approved! <p>Eligible Systems:</p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  </div> <div style="text-align: center;">  </div> <div style="text-align: center;">  </div> </div> <div style="display: flex; justify-content: space-around; align-items: center; margin-top: 10px;"> <div style="text-align: center;">  </div> <div style="text-align: center;">  </div> <div style="text-align: center;">  </div> </div>

* An exemption eliminates only the obligation to comply with other 6H National Area Source Rule requirements. Exempt facilities must still comply with air permits and all other applicable local, state and federal environmental requirements (including any that require operation within a spray booth), worker health and safety laws and regulations, and NFPA and local building codes.



PPG National Area Source Rule (6H) Training Registration Form

Participant				PPG Training Provider	
Social Security # (last 4 only):				Name:	
Name:				City:	State:
Home Address:				D #:	Date:
City:	State:	Zip:	Distributor:		
Home Phone:				Name:	
Email:				City:	State:
Company / Employer			Class Information		
Name:			Class Type: (check one)	<input type="checkbox"/>	Full (with hands-on)
Address:				<input type="checkbox"/>	Partial (no hands-on)
City:			Date:		
State:	Zip:	Location:			
Phone:					
Fax:					
Do you have any health concerns which may prohibit your participation in any hands-on activities involving application of refinish products?					Yes
					No
If yes, what are they:					
Emergency Contact Name:			Emergency Contact Phone:		
Participant Signature:			Date:		

This form is for ASR training courses ONLY. Please forward completed registration.

PPG INDUSTRIES DOES NOT PERMIT THE RECORDING OF ANY PORTION OF ITS VARIOUS TRAINING SESSIONS FOR ANY REASON. THIS INCLUDES VIDEO, AUDIO, DIGITAL, PRINT PHOTOGRAPHY, OR ANY LIKE FORMAT OR MEDIUM CAPABLE OF RECORDING OR REPRODUCING THE PERSONAL TRAINING SESSIONS THAT YOU WILL HAVE ACCESS TO. IF YOU ARE CAUGHT VIOLATING THIS POLICY YOU WILL BE REQUESTED TO LEAVE THE SESSION IMMEDIATELY.

Opt-out Notice: If you prefer not to receive a fax like this from the PPG Refinish Training Department in the future, you may notify us by phone, fax or email. (Phone 1-800-970-2283 (after selecting language, select 3 for Program Support, and 3 for Training Department); fax (800) 227-4952; or email *Strongsville Training Admin. You must include your name, company name, city, state and fax number(s). The failure of PPG to comply within 30 days with a do not send in the future request is unlawful.