



July 19, 2010

COMPLIANCE ADVISORY

NOTICE OF ADOPTION OF NESHAP SUBPART HHHHHH - PAINT STRIPPING AND MISCELLANEOUS SURFACE COATING OPERATIONS AT AREA SOURCES

The intent of this advisory is to notify potentially affected facilities of National Emission Standards for Hazardous Air Pollutants Subpart HHHHHH (NESHAP 6H). Potentially affected facilities are area sources that engage in any of the following:

- ✓ Any paint stripping operations that use methylene chloride (MeCl)-containing paint stripping formulations, regardless of quantity used;
- ✓ Any spray application of coatings to motor vehicles or 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).

An area source is any source that is not a major source, or any facility that emits less than 10 tons per year of individual hazardous air pollutants (HAP) or 25 tons per year of combined HAP.

NESHAP 6H 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 activities that are covered under another area source NESHAP.

Motor vehicle or mobile equipment surface coating operations may petition the District and EPA Region IX for an exemption from NESHAP 6H if the surface coating operation can demonstrate, to the satisfaction of the District, that spray-applied coatings do not contain compounds of Cr, Pb, Mn, Ni, or Cd.

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Requirements of NESHAP 6H

Paint stripping operations:

- Implement management practices that minimize emissions of MeCl.
- For each paint stripping operation with greater than 1 ton (approximately 181 gallons) of MeCl annual usage, develop and implement a written MeCl minimization plan.
- Maintain records of annual usage of paint strippers containing MeCl.

Motor vehicle, mobile equipment and miscellaneous spray coating operations:

- Train and certify all painters on spray gun equipment selection, spray techniques, maintenance, and environmental compliance.
- Install and operate 98% capture efficient filters on all spray booth enclosures.
- Spray-applied coatings must utilize a high volume, low pressure (HVLP) spray gun, electrostatic application, airless or air-assisted airless spray gun, or an equivalent technology.
- Cleaning of paint spray guns must minimize atomization of the cleaning solvent (i.e., only sprayed into an enclosed container).
- Spray booths and/or 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 and/or 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.
- Maintain records to demonstrate compliance with rule requirements.

Reporting and Compliance Dates

The following reporting forms should be sent to the District and EPA Region IX:

- Initial Notification form: January 11, 2010
- Petition for Exemption form (for motor vehicle and mobile equipment spray coating operations): No later than January 10, 2011.
- Notification of Compliance form: March 11, 2011
- Annual Notification of Changes report: By March 1 each calendar year after 2011, as required.

The compliance dates to implement requirements are as follows:

- Existing sources: January 10, 2011
- New sources: Upon startup.

Information and forms are available at the District's Public Workshops website at: http://www.sdapcd.org/homepage/public_part/workshops/public_workshops.pdf.

If you have questions concerning the rule, please contact Dustin Rice at (858) 586-2643 or Dustin.Rice@sdcounty.ca.gov. If you have compliance related questions, please contact the Compliance Division at (858) 586-2650.

DR:jl