

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

SBCA-SCA1-0308

On December 14, 2007 the US EPA signed a rule addressing air toxic emissions from paint stripping and miscellaneous surface coating operations at area sources. Implementation of this rule will reduce air toxics emitted from these sources that include methylene chloride, and metal compounds containing cadmium, chromium, lead, manganese and nickel. These metal compounds are called the target hazardous air pollutants or HAPs in the rule. Exposure to these compounds may cause cancer, central nervous system, respiratory system, and reproductive effects; kidney damage; and acute health disorders such as respiratory and skin irritation.

### **Who is affected by this rule?**

Three categories are affected by this rule:

1. Paint stripping operations using materials that contain methylene chloride (MeCl) to remove old paint from wood, metal, plastic, or other substrates
2. Spray application of coatings to motor vehicle and mobile equipment, including mobile repair operations
3. Spray application of coatings to plastic and/or metal parts and products, if the coatings used contain one of the target HAPs

If you have one of these operations then the following equipment at your facility will have requirements you must comply with by the deadlines in the rule.

- 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 facilities where MeCl is used

Having any one of these operations at your facility means you are affected by the rule.

### **Are there any related operations that are exempt from the rule?**

Certain sources have been excluded from this rule:

- federal facilities conducting covered activities
- activities performed by individuals on personal vehicles, possessions, or property as hobby or maintenance, or done without compensation
- research, laboratory, or quality control activities
- any activities covered by another area source rule
- facility maintenance

Motor vehicle and mobile equipment surface coating operations can obtain an exemption from the rule. They must submit a petition to US EPA and demonstrate that they do not use any coatings containing the target HAPs.

Other activities have also been excluded from having to meet the requirements. These include:

- hand-held spray applicators with cup capacity no more than 3.0 fluid ounces
- powder coating
- hand-held non-refillable aerosol containers
- thermal spray operations using solid metallic or non-metallic materials
- brush, roller, or hand wipe applications
- flow, dip, electrodeposition, web, and coal applications
- touch up markers or marking pens

Special coatings are also excluded, as follows:

- decorative or protective oils, acids, bases
- paper film or plastic film pre-coated with adhesive
- adhesive, sealants, maskants, caulking materials
- temporary protective coatings or surface prep materials
- in-mold coatings spray-applied when manufacturing reinforced plastic products

### ***I am affected. What do I have to do?***

The requirements affect the use of paint stripping materials, training for spray painters, spraying within booths, booth filters, and spray gun cleaning. The details are explained in three appendices to this fact sheet. Appendix A describes the paint stripping requirements. Appendix B describes the motor vehicle and mobile equipment requirements. Appendix C describes the plastic and/or metal parts surface coating requirements.

### ***When do I have to comply?***

All new sources must be in compliance by July 7, 2008 or within 180 days of the date they started, whichever is later. New sources are those that started construction or reconstruction of affected equipment after September 17, 2007. A source is not new if it constructed any of the affected equipment for the sole purpose of meeting the requirements of the rule.

Existing sources—any operation that isn't new—must comply by January 11, 2011.

### ***Who will enforce this rule?***

The Wisconsin Department of Natural Resources (DNR) is usually the primary enforcing agency for air pollution regulations. When US EPA issues rules, a state must go through the process of taking delegation of a rule and then writing it into their own state code. Because DNR does not plan to take delegation for this rule, the US EPA Region 5 office will be the primary agency responsible for enforcing the rule.

### ***What notifications do I have to submit?***

There are up to two one-time notifications and one periodic notification you have to submit. Submit notifications to both DNR and EPA as follows:

#### **1. DNR at:**

HAP Team Leader  
WDNR Air Program - AM/7  
PO Box 7921  
Madison, WI 53707-7921

#### **2. EPA Region 5 at:**

George Czerniak, Branch Chief  
US EPA - Region 5  
Air Enforcement and Compliance Assurance  
Branch - AE-17J  
77 West Jackson Blvd  
Chicago, IL 60604

### **Initial Notification**

This one-time notification informs US EPA that you are affected by the rule and provides some information about your facility. For new sources it is due by July 7, 2008 or within 180 days after start up, whichever is later. Existing sources have until January 11, 2010 to submit the notification.

The initial notification must contain:

- company name
- owner/operator name, title, street address, phone, email (if available), and signature
- street address for location of records, if different from above

- rule title: 40 CFR part 63, subpart HHHHHH
- description of operations
- new sources – statement of compliance status
- existing sources – may include statement of compliance status and avoid second notification
- compliance statements differ by operation – refer to the appendices

**Notification of Compliance Status**

Existing sources that did not demonstrate compliance at the time of initial notification must submit this report by March 11, 2011.

The Notification of Compliance Status, also a one-time notification, should include same basic company information as the Initial Notification, as well as the dates by which compliance was achieved for each of the requirements.

**Notification of Changes Report**

There is no annual compliance report required in this rule. Only if you make changes that affect your compliance will you need to submit a periodic report to update your compliance status. Notification is due on March 1st of the year following when changes occurred.



***Contacts for More Information or Assistance***

The Small Business Clean Air Assistance Program helps smaller businesses understand and comply with the Clean Air Act regulations. Contact the program's Clean Air Specialists for more assistance: Renée Lesjak Bashel at 608-264-6153, Tom Coogan at 608-267-9214, or Jean Beckwith at 608-261-2517.





### Appendix A: Requirements for Paint Stripping Operations

#### ***What are the requirements for paint stripping?***

Paint stripping operations must minimize the emissions of methylene chloride (MeCl) through 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

#### ***What records do I need to maintain?***

If you use more than one ton (2,000 pounds) of MeCl in one calendar year, then you must write up your plan to minimize emissions and post copies in all areas of your facility where stripping with MeCl occurs. If you use one ton or less of MeCl, then you are obligated to follow a minimization plan but do not need to have a written plan. A facility should review their minimization plan annually and update as needed.

To demonstrate your usage of MeCl, you must keep a record of:

- materials used that contain MeCl
- the MeCl content for each material—a MSDS or supplier data sheet is sufficient

- amounts of each material used—purchase receipts, supplier data, or calculations are acceptable methods

You should also keep records of updated minimization plans and any time your operations do not meet the requirements of the rule—called a deviation.

#### ***What specific reporting requirements apply?***

There are a few reports specific to paint stripping operations.

#### **Initial notification**

Paint stripping operations must indicate whether they will use more than one ton of MeCl by the compliance due date.

#### **Notification of Compliance Status**

For those using more than one ton of MeCl, they must certify that a written plan was developed and is being implemented.

#### **Notification of Changes Report**

If MeCl use increases above one ton in a calendar year, the source must submit a changes report by March 1st and then develop a written plan by December 31st of the next calendar year. After that, a notification of compliance status is due by March 1st of the following calendar year.

For example, if usage increases during 2012, a notification of changes report is due March 1, 2013, the written plan is due by December 31, 2013, and a notification of compliance status is due March 1, 2014.



## Appendix B – Requirements for Motor Vehicle and Mobile Equipment Surface Coating Operations

### ***What are the requirements for motor vehicle and mobile equipment surface coating?***

Surface coating operations must meet the following practices:

1. certify that all spray painters have completed training in proper spray-application techniques and set-up and maintenance of the spray equipment
2. apply spray coatings in spray booth, prep station or mobile enclosure that meets the following
  - use dry filters that achieve minimum of 98% collection efficiency OR use waterwash booth
  - full vehicles must be contained within a booth having four full walls (or side curtains) and a roof, that is operated at negative pressure or use a downdraft booth that is operated at no more than 0.05 inches water gauge, positive pressure
  - vehicle parts must be contained within a booth having three sides and a roof, and openings for conveyors are allowed
  - spot repair equipment must enclose and seal the area being repaired, such that emissions are captured and directed to a filter system
3. use one of the allowed spray application technologies:
  - high volume, low pressure (HVLP)
  - electrostatic
  - airless
  - air-assisted airless

- any technology approved by EPA with equivalent transfer efficiency

4. use spray gun cleaning operation that does not spray solvent and waste coatings outside collection container; suggested alternatives include
  - hand cleaning
  - flushing gun with solvent
  - fully enclosed gun cleaner

There are a few exceptions to those requirements. The listed spray technology is not required when painting is performed by students and instructors at a paint training center or when coating aerospace vehicles. Painter certification is not required for students under the supervision of a certified instructor.

### ***What type of vehicles qualify as motor vehicle and mobile equipment?***

Mobile equipment includes just about any type of equipment that may be driven or pulled along a roadway. The following definitions are taken directly from the rule:

**“Motor vehicle means any self-propelled vehicle, including, but not limited to, automobiles, light duty trucks, golf carts, vans, and motorcycles.”**

**“Mobile equipment means 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).”**

### ***What if a vehicle doesn't fit within a booth?***

The definition of facility maintenance has been used to exclude many pieces of equipment that might not fit in a booth. The following excerpt from the rule's definition explains the exclusion for large vehicles:

**“[...] 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. Facility maintenance does not include surface coating of motor vehicles, mobile equipment, or items that routinely leave and return to the facility, such as delivery trucks, rental equipment, or containers used to transport, deliver, distribute, or dispense commercial products to customers, such as compressed gas canisters.”**

### ***When must all painters be trained?***

For new sources, all painters must be trained within 180 days of their starting date or July 7, 2008, whichever is later. At existing sources, all painters must be trained within 180 days of their starting date or by January 10, 2011, whichever is later. All painters must receive refresher training every five years.

Existing personnel can use training or experience obtained up to five years prior to the compliance due date. The owner can take into account job redo's, the painter's ability to optimize transfer efficiency, use of minimum amount of paint necessary to complete a job order, and any other business factors deemed necessary to established the painter has adequate experience.

### ***What elements must be covered in the painter training program?***

All personnel that will spray-apply coatings in your facility must have a certification that they have received training that meets the

requirements of this rule. That training program must include:

1. spray equipment selection, set-up, and operation
2. optimum spray techniques for different types of coatings, for best transfer efficiency and minimal overspray
3. routine booth and filter maintenance, filter selection and installation
4. compliance with the requirements of the rule

### ***What must be included in the painter training certification?***

The owner or operator must certify the following items related to painter training requirements:

- list of personnel who are required to be trained, including name and job description
- dates of hands-on and classroom instruction, and elements completed at each
- description of methods used at completion of training to measure successful completion for each element

### ***What records do I need to maintain?***

The following records must be maintained for a total of five years, during which they must be located on site for at least the first 2 years but after that may be located off site:

- painter training certifications
- documentation of booth filter collection efficiency
- US EPA approval for alternate spray technologies used
- copies of all notifications and reports submitted to US EPA
- any time operations do not meet the requirements of the rule—called a deviation

### ***What specific reporting requirements apply?***

When making a notification that your operation is in compliance with the rule—whether at the initial notification or the notification of compliance status—be sure and include the date by which you were in compliance for each element of the rule.

### Appendix C – Requirements for Miscellaneous Surface Coating Operations

#### ***What are the requirements for miscellaneous surface coating operations?***

Surface coating operations must meet the following practices:

1. certify that all spray painters have completed training in proper spray-application techniques and set-up and maintenance of the spray equipment
2. apply spray coatings in spray booth or prep station that meets the following
  - use dry filters that achieve minimum of 98% collection efficiency OR use waterwash booth
  - plastic and/or metal parts must be contained within a booth having three sides and a roof, and openings for conveyors are allowed
3. use one of the allowed spray application technologies:
  - high volume, low pressure (HVLP)
  - electrostatic
  - airless
  - air-assisted airless
  - any technology approved by EPA with equivalent transfer efficiency
4. use spray gun cleaning operation that does not spray solvent and waste coatings outside collection container; suggested alternatives include
  - hand cleaning
  - flushing gun with solvent
  - fully enclosed gun cleaner

There are a few exceptions to those requirements. The listed spray technology is not required when painting is performed by students and instructors at a paint training center or when coating aerospace vehicles. Painter certification is not required for students under the supervision of a certified instructor.

#### ***What operations are included as miscellaneous surface coating for this rule?***

The primary focus of this rule is on the spray-application of surface coatings to plastic and/or metal parts only. The following definition from the rule explains what operations are included:

*“Miscellaneous surface coating operation means the collection of equipment used to apply surface coating to miscellaneous parts and/or products made of metal or plastic, including applying cleaning solvents to prepare the surface before coating application, mixing coatings before application, applying coating to a surface, drying or curing the coating after application, and cleaning coating application equipment, but not plating. A single surface coating operation may include any combination of these types of equipment, but always includes at least the point at which a coating material is applied to a given part. A surface coating operation includes all other steps (such as surface preparation with solvent and equipment cleaning) in the affected source where HAP are emitted from the coating of a part. The use of solvent to clean parts (for example, to remove grease during a mechanical repair) does not constitute a miscellaneous surface coating operation if no coatings are*

applied. A single affected source may have multiple surface coating operations. Surface coatings applied to wood, leather, rubber, ceramics, stone, masonry, or substrates other than metal and plastic are not considered miscellaneous surface coating operations for the purposes of this subpart.”

### ***When must all painters be trained?***

For new sources, all painters must be trained within 180 days of their starting date or July 7, 2008, whichever is later. At existing sources, all painters must be trained within 180 days of their starting date or by January 10, 2011, whichever is later. All painters must receive refresher training every five years.

Existing personnel can use training or experience obtained up to five years prior to the compliance due date. The owner can take into account job redo's, the painter's ability to optimize transfer efficiency, use of minimum amount of paint necessary to complete a job order, and any other business factors deemed necessary to established the painter has adequate experience.

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