

Paint Stripping and Miscellaneous Surface Coating

Area Source Rule Subpart HHHHHH

This is not an official EPA document. This fact sheet is a summary of the rule for your convenience; all official determinations must be made based upon the actual final rule text. See 40 CFR 63.11169 - 63.11180

Compliance Timeline

Action	Required By	Existing Sources	New Sources (Start up after 9/17/07 but before 1/9/08)	New Sources (Where start up is on or after 1/9/08)
Effective Date	All	January 9, 2008	January 9, 2008	January 9, 2008
Compliance Date	All	January 10, 2011	January 9, 2008	Date of initial set up
Complete Surface Coating Training	Autobody and Miscellaneous Surface Coaters	January 10, 2011, for existing painters, or 180 days after hiring whichever is later	July 7, 2008 for existing painters, or 180 days after hiring for new hires	July 7, 2008 for existing painters, or 180 days after hiring for new hires
Submit Initial Notification see 863.11175 (a)	All	January 11, 2010	July 7, 2008	180 days after initial start up
Submit Notification of Compliance Status see 863.11175 (b)	All	Notify as part of the initial notification or by March 11, 2011	Notify as part of the initial notification by July 7, 2008	Notify as part of the initial notification 180
Submit Annual Notification of Changes Report see 863.11176 (a)	Submit a report each calendar year in which information has changed. Deviations from requirements will be deemed to be a change.	Due no later than March 1 of the following calendar year	Due no later than March 1 of the following calendar year	Due no later than March 1 of the following calendar year

Headquarter Contacts:

Collision Repair Campaign: Holly Wilson, 919.541.5624, wilson.holly@epa.gov

Paint Stripping: Warren Johnson, 919.541.5124, johnson.warren@epa.gov

Office of Enforcement and Compliance Assurance: Len Lazarus, 202.541.5580, lazarus.len@epa.gov

What is required?

Autobody Coating and Miscellaneous Surface Coating

All owners and operators of affected sources must certify that:

Gun Cleaning - All spray gun cleaning is done in an enclosed spray gun cleaner, or by cleaning the disassembled gun parts by hand, or by flushing solvent through the gun without atomizing the solvent and paint residue (i.e., spraying solvent through the gun outside of a gun cleaner is prohibited)

Training - All owners must certify that all painters that spray coatings have completed classroom and hands-on training in the proper selection, mixing, and application of coatings. Training must be completed no later than 180 days after hiring and refresher training is required every 5 years. Training requirements are described in 40 CFR 63.11173(f) and include:

1. spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure volume, and fluid delivery rate
2. Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lag spraying at the beginning and end of each stroke.
3. Routine spray booth and filter maintenance, including filter selection and installation
4. Necessary requirements of this regulation for environmental compliance

Spray Booth - All spray applied coatings are applied in an enclosed prep station or spray booth. Prep stations and spray booths that are used to refinish complete motor vehicles or mobile equipment must be fully enclosed with 4 complete side walls or curtains and a complete roof and must be ventilated at negative pressure or have an automatic pressure balancing system operated up to 0.05 inches water gauge positive pressure. Parts must be sprayed applied in a booth with a full roof and at least 3 walls or side curtains which must be ventilated so that air is drawn into the booth. The exhaust must be filtered with filters that are at least 98% efficient.

HVLP Spray Guns - They only use high pressure low volume (HVLP) spray guns, electrostatic spray guns, airless spray guns, or EPA approved equivalents.

Notifications and Recordkeeping - In addition to the notifications and reports described above in the Compliance Timeline table all sources must maintain records demonstrating: all spray painters are trained and certified, spray booth filters are at least 98% efficient, all spray guns are HVLP, electrostatic, or equivalent, all spray gun cleaning is done in compliance documentation of any deviations, and documentation of any information used to submit notifications or reports

Paint Stripping

Best Management Practices - All sources must certify that they have implemented management practices to minimize evaporative losses including: evaluate whether it is possible to re-coat the piece without removing the existing coating ensure that there is no alternative paint stripping technology that can be used, optimizing stripper application conditions reducing exposure to air, and proper storage and disposal.

Minimization Plan - Sources that use 1 ton or more per year of paint stripper containing Meth MeCl must also certify that they have developed, posted, and implemented a written MeCl minimization plan including the management practices above

Notifications and Recordkeeping - In addition to the notifications and reports described above in the Compliance Timeline table all sources must maintain records demonstrating: annual usage of MeCl in paint stripper, records such as MSDS sheets for all paint strippers containing MeCl, and the MeCl minimization plan for sources that use 1 ton or more per year