



Paint Stripping and Surface Coating Operations at Area Sources

Information Sheet: A Summary of 40 CFR Part 63, Subpart HHHHHH

Prepared by the Oregon Department of Environmental Quality

Affected Sources

- Paint stripping operations using chemical strippers containing methylene chloride (MeCl);
- Motor vehicle or mobile equipment refinishing operations with spray-applied surface coating operations;
- Spray application of coatings containing chromium, lead, manganese, nickel, or cadmium to any part or product made of metal or plastic, or combinations of metal and plastic (miscellaneous surface coating operations).

Exempted Sources

- Surface coating/paint stripping performed at U.S. Armed Force installations, of military munitions manufactured by or for the U.S. Armed Forces, or equipment directly and exclusively used for the purposes of transporting military munitions.
- Surface coating/paint stripping by individuals on their personal vehicles, possessions, or property, either as a hobby or for maintenance, including operations performed by individuals for others without compensation - **limited to two motor vehicles or pieces of mobile equipment per year.**
- Surface coating/paint stripping classified as “research and laboratory activities”.
- Surface coating/paint stripping classified as “quality control activities”.
- Surface coating/paint stripping activities covered under another area source NESHAP (National Emission Standards for Hazardous Air Pollutants).
- Spray coating applications classified as facility maintenance or space vehicle.
- Motor vehicle or mobile equipment refinishing operations may petition for an exemption if they can demonstrate that they spray apply no coatings containing chromium, lead, manganese, nickel, or cadmium.

New/Reconstructed Sources

- Commenced construction/reconstruction after 9/17/2007 by installing new paint stripping/surface coating equipment at a source that was not actively engaged in paint stripping and/or miscellaneous surface coating prior to 9/17/2007.
- The purchase and installation of spray booths, enclosed spray gun cleaners, paint stripping equipment to reduce MeCl emissions or new spray guns to comply with the NESHAP do not make an existing source a new source.

Compliance Dates

- New/reconstructed source: January 9, 2008 or upon initial startup, whichever is later.
- Existing affected source: January 10, 2011.

General requirements

Apply spray-applied coatings in a spray booth, preparation station or mobile enclosure, use HVLP or equivalent spray guns, provide painter training and certification, and use a gun cleaner or ensure that cleaning solvent is not atomized during cleaning (i.e.: hand cleaning, etc).

Spray booth/preparation stations

For refinishing complete motor vehicles or mobile equipment:

- Fit with filter technology demonstrated to achieve at least 98-percent capture of paint overspray.
- Fully enclosed with a full roof, and four complete walls or side curtains.
- Ventilated at negative pressure so that air is drawn into any openings or curtains.
- If a spray booth is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at ≤ 0.05 inches water gauge positive pressure.
- Does not apply to waterwash spray booths.

For refinishing miscellaneous parts and products or vehicle subassemblies:

- Full roof, at least three complete walls or side curtains, and ventilated so air is drawn into the booth.
- Walls and roof of a booth may have openings, if needed, to allow for conveyors and parts to pass through the booth during the coating process.

For refinishing mobile ventilated enclosures used for spot repair

- Enclose and, if necessary, seal against the surface around the area being coated such that paint overspray is retained within the enclosure and directed to a filter to capture paint overspray.

Painter Certification

Have all painters trained and certified. Spray application is prohibited by persons who are not certified.

- New sources: No later than 180 days after hiring or no later than July 7, 2008, whichever is later.
- Existing sources: No later than 180 days after hiring or no later than January 10, 2011, whichever is later.
- Equivalent training completed within 5 years prior to the date training is required, satisfies the training and certification requirement and is valid for a period of 5 years after the date of completion.
- Training and certification will be valid for a period not to exceed 5 years.

Required training elements

- Must be hands-on and classroom training that at a minimum addresses the following:
 - Spray gun equipment selection, set up and operation (to include: coating viscosity, proper fluid tip or nozzle selection, proper spray pattern, air pressure and fluid delivery rate).
 - Improvement in transfer efficiency to minimize overspray and coatings usage (to include: correct gun distance and angle to part, proper banding and overlap, and the reduction in lead and lag at the beginning and end of each stroke).
 - Routine spray booth and filter maintenance (including selection, installation and change out)
 - Instructions on how to comply with the requirements of the rule.

Spray equipment

- All spray-applied coatings must be applied with a spray gun classified as HVLP, electrostatic, airless, air-assisted airless, or an equivalent technology.
- Equivalent technology must be requested in writing and approved for use in advance.

Spray gun cleaning

- All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent.
 - Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer.
 - A combination of non-atomizing methods may also be used.

Paint stripping operations

Management Practices

- Implement the following management practices to minimize emissions of MeCl.
 - Evaluate each application to ensure there is a need for paint stripping.
 - Evaluate each application to ensure that there is no alternative paint stripping technology that can be used.
 - Reduce exposure of all paint strippers containing MeCl to the air.
 - Optimize application conditions when using paint strippers containing MeCl to reduce MeCl evaporation.
- Practice proper storage and disposal of paint strippers containing MeCl.

Minimization Plan

- Required at each paint stripping operation that uses > 1 ton/yr of MeCl.
- Develop and implement a written MeCl minimization plan to minimize the use and emissions of MeCl.
- Post a placard/sign outlining the plan in each area where paint stripping operations occur.
- Maintain a copy of current plan on site at all times.

Annual MeCl Usage Records

- Maintain on-site copies of annual usage of paint strippers containing MeCl.

Notifications

Initial Notification

- New affected sources: No later than 180 days after initial startup or July 7, 2008, whichever is later.
- Existing affected sources: No later than January 11, 2010.

Notification of Compliance Status

- New affected sources: With initial notification.
- Existing affected sources: On or before March 11, 2011.

Reports

Annual Notification of Changes Report

Required when information previously submitted in any notification has changed. Deviations from the General Requirements will be deemed to be a change. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred. **NOTE:** This includes notification when paint stripping sources that have not developed and implemented a written MeCl minimization plan used > 1 ton of MeCl in the previous calendar year.

Required Records – To Be Kept On Site

General Requirements

- Copies of any notification and changes report submitted.
- Records of any deviations. These records must include the date and time period of the deviation, a description of the nature of the deviation and the actions taken to correct it.
- Records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report.

Surface Coating Operations

- Certification that each painter has completed the required training with the date the initial training and the most recent refresher training was completed.
- Documentation of the spray booth filter efficiency.
- Documentation from the spray gun manufacturer that each spray gun with a cup capacity ≥ 3.0 fluid ounces not classified as HVLP, electrostatic, airless, or air assisted airless, has been determined by the appropriate authority (EPA or DEQ) to achieve a transfer efficiency equivalent to that of an HVLP spray gun.

Paint Stripping Operations

- Records of paint stripper usage, including the MeCl content of the paint stripper used.
- A record of the current MeCl minimization plan (if required) and records of the annual review of the plan and updates.