



NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS

Presentation by the
Education/Training Committee
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NESHAP (SUBPART HHHHHH)

Brief Summary of Regulations Controlling Air Emissions from:

- Paint Stripping
- Miscellaneous Surface Coating Operations



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).



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.)



Does this rule apply to me?

- Yes, all collision & fleet coatings application facilities, as well as paint stripping operations using MeCl (traditionally known as aircraft stripper), are intended targets for this rule.



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.
- Maintain records of annual usage of paint strippers containing MeCl



What Am I Required To Do?

- Motor Vehicle/Mobile Equipment/Miscellaneous Surface Coating Operations.
 - ◆ Train/certify all painters on spray gun equipment selection, spray techniques, maintenance, and environmental compliance
 - ◆ Install/operate filter technology on all spray booths/stations/enclosures to achieve at least 98% capture efficiency.



What Am I Required To Do?

- 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.



What Am I Required To Do?

- 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 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



What Reporting is Required?

- 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.



What Recordkeeping is Required?

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.



Do I need to take action if I do not spray coatings that contain heavy metal HAP, or use stripper that contains MeCl?

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).



Where can I get trained?

- Paint Manufacturers
- I-CAR: <https://www.icaronlinetraining.com>
- ReComply: www.ReComply.com
- Team Safety: teamsafety.us
- EPA : <http://www.epa.gov/collisionrepair/>
- In-House training
- Spray booth manufacturers



Thank You!

- Jason Bartanen; I-CAR Technical Director
- Colette Bruce; Team Safety, owner
- Steve Schillinger; ReComply, President
- Joe Skurka: BASF, OEM & Ind. Relations
- Alan Craighead; Akzo Nobel, Sr. Tech Mgr