

**Rule Summary:**  
**Final Area Source NESHAP for Paint Stripping and Misc. Parts Coating Operations**

Rule: **40 CFR Part 63, Subpart HHHHHH (6H)**  
Docket: **EPA-HQ-OAR-2005-0526**  
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**Applicability**

1. Area sources that conduct paint stripping of wood, metal, and/or plastic substrates and that utilize chemical paint strippers containing methylene chloride (MeCl);
2. Area sources that conduct miscellaneous surface coating of parts and/or products made of metal or plastic or combinations of metal and plastic; and
3. Area sources that conduct surface coating of motor vehicles and mobile equipment.

The proposed rule will not apply to operations at major sources of Hazardous Air Pollutants (HAPs) nor area sources of HAPs that are covered by other area source NESHAPs (primarily military facilities and installations). See attachment for non-inclusive list of NAICS codes for potentially affected industry sectors.

**Standards**

Paint Stripping Operations:

1. Implement a Best Management Practices (BMP) plan to reduce evaporative losses of MeCl;
2. If annual usage of MeCl is equal to or greater than 150 gallons, develop and implement a written MeCl minimization plan; each use of MeCl must be evaluated, and MeCl may only be used when no alternatives exist, plan must incorporate proper storage protocols for MeCl, etc.
3. Recommended alternatives to MeCl:
  - a. Chemical stripping agents that do not contain MeCl (formic acid, benzyl alcohol, etc.)
  - b. Mechanical stripping
  - c. Blasting with wet or dry media
  - d. Thermal or cryogenic decomposition
  - e. Intense light
4. If required, MeCl plan must be submitted to implementing agency for approval and instructional placards placed in prominent positions within facility.
5. There are no numerical restrictions on MeCl content of strippers or amount of MeCl used.

Miscellaneous Surface Coating Operations:

1. Spray guns must be HVLP, electrostatic or demonstrated equivalent;

2. All spraying must be done in a prep station or spray booth consisting of a full roof with three complete walls or side curtains and ventilated such that air is drawn into the booth/enclosure;
3. Exhaust air from the booth/enclosure must be filtered with fiberglass or polyester fiber filters or alternative filter technology demonstrated to be equivalent (water walls). Polystyrene foam and cardboard baffle filters will not suffice;
4. Spray gun cleaning must be done in enclosed cleaning machines or by hand if spray guns are disassembled. No unenclosed spraying of solvent through guns will be permitted;
5. All painters must be trained and certified within 60 days of hiring and recurrently every five years thereafter. Typical training consists of 16 hour courses (~ \$1,000 per person).

Training courses must incorporate the following elements:

- a. Surface preparation;
  - b. Spray gun set-up and operation including high transfer efficiency spraying techniques;
  - c. Routine spray booth and filter maintenance, paint mixing, matching and application techniques;
  - d. Resolving paint application problems;
  - e. Causes and solutions for finish defects;
  - f. Safety precautions such as respirators, fire hazards, etc.; and
  - g. Environmental compliance issues.
6. There are no numerical restrictions on HAP content of coatings or amount of coatings used.

#### **Compliance Dates:**

- For new and reconstructed sources: upon start-up or publication of final rule in the Federal Register, whichever is later. New sources are those that are constructed, significantly modified or commence operations after publication of the *proposed* rule in the Federal Register;
- For existing sources: within two years of publication of final rule in the Federal Register. Existing sources are those sources that are not new or reconstructed sources.

#### **Reporting:**

1. Initial notifications must be submitted to the implementing agency before the following deadlines:
  - For new and reconstructed sources: within 120 days after start-up or publication of the final rule in the Federal Register, whichever is later; and
  - For existing sources, within one year of publication of the final rule in the Federal Register.
2. Initial compliance reports must be submitted to the implementing agency before the following deadlines:
  - For new and reconstructed sources: within 120 days after compliance deadline (same deadline as for initial notification);
  - For existing sources, within 30 days after the compliance deadline (25 months after publication of final rule in the Federal Register).
3. Recurrent annual compliance reports must be submitted for each calendar year.

#### **Records:**

The following records must be maintained on-site at each affected facility (if applicable). Records must be maintained for five years and must be kept on site for at least two years:

1. Annual usage of MeCl

2. Documentation of compliance with MeCl minimization plan;
3. Painter training certifications;
4. Documentation that non-fiberglass/polyester fiber filter systems achieve  $\geq 98\%$  reduction efficiency in particulate matter emissions from paint overspray;
5. Documentation that non-HVLP/electrostatic spray guns achieve comparable transfer efficiency;
6. Documentation that all spray gun cleaning conforms to the standard;

**ATTACHMENT: LIST OF POTENTIALLY AFFECTED NAICS CODES**

<b>Category</b>	<b>NAICS Codes</b>	<b>Examples of Potentially Regulated Facilities</b>
Aerospace Equipment	336413 336414 336415 54171	Aircraft engines, aircraft parts, aerospace ground equipment.
Automobiles & Automobile Parts	335312 336111 336211 336312 33632 33633 33634 33637 336399 441110 441120 811121	Engine parts, vehicle parts and accessories, brakes, axles, etc. Motor vehicle body manufacturing and automobile assembly plants. New and used car dealers. Automotive body, paint, and interior repair and maintenance.
Chemical Manufacturing	325110 325120 325131 325188 325192 325193 325199 325998	Petrochemicals, Industrial Gases, Inorganic Dyes and Pigments, Basic Inorganic and Organic Chemicals, Cyclic Crude and Intermediates, Ethyl Alcohol, Miscellaneous Chemical Production and Preparation.
Extruded Aluminum	331316 331524 332321 332323	Extruded aluminum, architectural components, coils, rod, and tubes.
Government Agencies	N/A	Government entities, besides Department of Defense, that maintain vehicles, such as school buses, police and emergency vehicles, transit buses, or highway maintenance vehicles.
Heavy Equipment	33312 333611 333618	Tractors, earth moving machinery.
Job Shops	332312 332722 332813 332991 332999 334119 336413 339999	Manufacturing industries not elsewhere classified (e.g., bezels, consoles, panels, lenses).
Large Trucks & Buses	33612 336211	Large trucks and buses.
Metal Buildings	332311	Prefabricated metal buildings, carports, docks, dwellings, greenhouses, panels for buildings.
Metal Containers	33242 81131 322214 331513 332439	Drums, kegs, pails, shipping containers.
Metal Pipe and Foundry	331111 331513 33121 331221 331511	Plate, tube, rods, nails, etc.

Category	NAICS Codes	Examples of Potentially Regulated Facilities
Rail Transportation	33651 336611 482111	Brakes, engines, freight cars, locomotives.
Recreational Vehicles and Other Transportation Equipment	321991 3369 331316 336991 336211 336112 336212 336213 336214 336399 336999 33635 56121 8111 56211	Mobile Homes. Motorcycles, motor homes, semi trailers, truck trailers. Miscellaneous transportation related equipment and parts. Travel trailer and camper manufacturing.
Rubber-to-Metal Products	326291 326299	Engine mounts, rubberized tank tread, harmonic balancers.
Structural Steel	332311 332312	Joists, railway bridge sections, highway bridge sections.
Waste Treatment Disposal and Materials Recovery	562211 562212 562213 562219 562920	Hazardous Waste Treatment and Disposal, Solid Waste Landfill, Solid Waste Combustors and Incinerators, Other Non-hazardous Waste Treatment and Disposal, Materials Recovery
Other Industrial and Commercial	211112	Natural Gas Liquid Extraction.
	311942	Spices and Extracts.
	331311	Alumina Refining.
	337214 811420	Office furniture, except wood. Re-upholstery and Furniture Repair.
	325211	Plastics Material Synthetic Resins, and Non-vulcanizable Elastomers.
	325510	Paint and Coating Manufacturing.
	32614 32615	Plastic foam products (e.g., pool floats, wrestling mats, life jackets).
	326199	Plastic products not elsewhere classified (e.g., name plates, coin holders, storage boxes, license plate housings, cosmetic caps, cup holders).
	333313	Office machines.
	33422	Radio and television broadcasting and communications equipment (e.g., cellular telephones).
	339111 339112	Medical equipment and supplies.
	33992	Sporting and athletic goods.
	33995	Signs and advertising specialties.
	336612	Boat building
713930	Marinas, including boat repair yards	