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Questions and Answers about the recently promulgated federal regulation 40 CFR Part 63, Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coatings Operations at Area Sources (Responses intended for PPG Refinish customer at truck & car, body shop repair/coating facilities. Methylene Chloride paint stripping operations above 1 ton per year and certain other surface coating operations are covered by this rule, but are not addressed in this Q & A.)

- 1. Does this rule apply to me?** Yes, all collision & fleet coatings application facilities, as well as paint stripping operations using Methylene Chloride (MeCl), are intended targets for this rule. (Industrial facilities are covered that spray apply coatings that contain the target heavy metal HAPs (see #8) and/or use paint strippers that contain MeCl.)
- 2. Is the EPA going to send me a letter indicating what needs to be done to comply with this new ruling?** Local or state air quality agencies or the federal EPA will take some steps to publicize the rule. They may send a notice to your facility announcing implementation of this rule, but that is not guaranteed. You are required to comply with the rule whether or not you receive an introductory letter or other communication from the government. When in doubt, you can contact the local EPA and ask what your next step is. Reference rule 40 CFR Part 63, Subpart HHHHHH.
- 3. How does my startup date affect filing with the EPA?** The timeline you must follow depends on whether you are a new or existing facility. A new facility that began covered operations between September 17, 2007 and January 9, 2008 had to comply by January 9, 2008. A new facility that begins covered operations after January 9, 2008 must comply with this rule at startup. An existing facility that began covered operations before September 17, 2007 has until January 10, 2011 to comply (but must notify EPA and/or your state or local air agency a year earlier).

- 4. What is the deadline for notification?** New facilities must file an Initial Notification within 180 days of startup or by July 7, 2008, whichever is later. Existing facilities must submit the Initial Notification by Jan 11, 2010.
- 5. What needs to be in the notification?** The rule requires specific information including your company name, address, identification of the rule (40 CFR Part 63, Subpart HHHHHH), facility description, and your compliance status. Consult the rule or contact your state or local air agency or the U.S. EPA as to complete filing requirements. New facilities must indicate that they are in compliance at the time of the Initial Notification. If an existing facility indicates it is not yet in compliance in the Initial Notification, it must file a Notification of Compliance by March 11, 2011.
- 6. When must a facility comply?** New facilities are expected to comply by January 9, 2008 or at startup, whichever is later; existing facilities have until January 10, 2011.
- 7. What must a refinish facility do to comply? Some of the major requirements for spray coating operations are:** 1.) Use HVLP or equivalent transfer efficiency. 2.) Use only enclosed prep stations & spray booths meeting the definition of this rule (with minimum 98% efficient filters). 3.) Train all painters to utilize the required technology, including methods to minimize overspray/waste. 4.) No spray gun cleaning by atomization of cleaning solvent into filters; must use hand breakdown of guns for cleaning or enclosed gun cleaner apparatus. 5.) Keep records to demonstrate compliance. 6.) File required notifications with EPA and/or your state or local air agency.
- 8. Do I need to take any action if I do not spray coatings that contain listed heavy metal HAP or use stripper that contains methylene chloride....do I have to follow any of this?** If you are a motor vehicle or mobile equipment surface coating operation, you must comply with this rule even if you do not use methylene chloride or the listed heavy metal HAP. If you do not use coatings containing any of the "target HAPs" (i.e., chromium, lead, manganese, nickel and cadmium) or use paint strippers that contain MeCl, you can apply for an exemption (from the requirements of this rule) with the EPA Administrator, presenting evidence of your claim that your operations do not involve the use of any of the target HAPs. Exemptions are effective for coatings operations only after written approvals are received from the EPA Administrator. Exemption from this rule does not exempt you from other federal, state or local regulations applicable to your operations.
- 9. Can I eliminate the spraying of listed heavy metal HAPs?** It is possible that you can eliminate use of the heavy metal "target HAPs" by selecting the appropriate products. The PPG refinish website will list all products that contain these metals once the EPA has finalized its list of restricted heavy metal HAPs (March 9, 2008). But even if you use only products that do not contain any of the

“target HAPs,” you will still need to apply for the exemption discussed in #8 above.

10. If I already go to training, use HVLP and have an enclosed spray booth and clean my spray guns as required....what else do I need to do to comply? In order to meet the requirements of this rule, you must notify the EPA and/or your state or local air agency of your existence (i.e., the Initial Notification and, if needed, the Notification of Compliance Status); maintain records documenting your compliance and keep records of any change in status including: new painters hired, facility modifications impacting status etc...) Consult the rule and/or contact the EPA or your state or local air agency for complete filing requirements. Most of these notification and recordkeeping requirements also apply to paint stripping operations using MeCl.

11. How soon after hiring must a new painter be trained and certified? At a new facility, all painters must have training by July 7, 2008 or within 180 days of their date of hiring, whichever is later. At an existing facility, painters must be trained by January 10, 2011 or within 180 days of hiring, whichever is later. Training is “good” for 5 years. If approved training is completed/certified within 5 years before the applicable training deadline, it does not have to be refreshed until 5 years has elapsed.

12. Does PPG training count? As of December 1, 2008 PPG Certification 21 and Recertification courses (Deltron, Global, Nexa Autocolor, Aquabase Plus, Envirobase HP) will have sections designed to cover the required topics.

For the required records of painter training, students should obtain the following as they complete the relevant course: 1.) a certificate of completion, 2.) a summary of the required topics that were covered and 3.) a passing final test covering topics listed in this rule.

13. What are the “routine spray booth and filter maintenance” training requirements? The painter will be expected to understand how to operate his spray booth within the booth manufacturer’s guidelines, to obtain advertised performance for air flow, and optimum coatings application parameters. The operator would be expected to be able to adjust booth controls to maintain peak efficiency and to understand when and how to change booth filters as required.

14. If I train my painters in-house is that acceptable? The rule does allow in-house training as long as it meets the specifications set forth in the rule. Additionally, some portions of the training for the initial 5-year period may be waived for experienced painters if you can document that those painters have equivalent work experience and/or training; but even experienced painters are required to meet the 5-year refresher training and recertification requirements in the rule.

15. Do I need to keep any reports? For a rolling 5-year period, all relevant training and technology documents must be kept. All documents should present evidence of compliance with this regulation: manufacturer documentation of HVLP or equivalent transfer efficiency, manufacturer documentation of prep & spray booth filter efficiency, painter training records, and all notifications submitted to EPA and/or your state or local agency. Paint strippers using MeCl must keep records of quantitative used and notifications sent to EPA, among other records. Consult the rule or contact EPA or your state or local air agency for complete recordkeeping requirements.

16. Are there any exemptions to the rules for refinish facilities? Yes. This rule is intended to cover only spray application of refinish coatings systems. If your facility does not apply by spray atomization or only uses hand-held, non-refillable aerosols and airbrush with a maximum paint cup capacity of 3 fluid oz, you could be exempt. Military facilities, certain R& D and Q.C. functions and personal/hobbyist vehicle exemptions exist (no more than two vehicles per year). If you are a Refinish facility but believe you are exempt, we recommend that you verify this exempt status with your legal counsel or EPA and obtain any verification of exempt status in writing, if possible.

17. If I am exempt from this rule, what about all other rules & regulations? Even if you are determined to be exempt from 40 CFR Part 63, Subpart HHHHHH, all other applicable rules and permit requirements - local, state and federal, still apply to your operations.

18. If I don't use Methylene Chloride-containing strippers, do I have to file a report with the EPA stating this fact? No, only if you use MeCl strippers, in any amount, will you have to file with the EPA. You still may have to report spray coatings application activity under the requirements of the rule.

19. If I only use 10-20 gallons of Methylene Chloride-containing stripper in a year, do I have to file a report to the EPA at this low level? Yes, you must file the required reports (discussed above) for any paint stripping activity using MeCl, and you must implement several work practices including: determining the actual need for using MeCl stripper, determining whether there are viable replacements that are safer, making sincere efforts to reduce worker MeCl exposure by optimizing application conditions including storage and disposal. Yearly records of usage will also be required.

20. If I use more than a ton of MeCl stripper in a year, what should I do? Additional requirements apply for MeCl usage above one ton, including MeCl minimization plans, Consult the text of the rule.

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