

Key Points

- **Facilities that SPRAY the target HAP's** - Industrial and Automotive.
(Chromium, Lead, Manganese, Nickel and Cadmium)
- **Paint Stripping facilities that use Methylene Chloride - MeCl.**
- **ALL painters MUST be trained.**
 - **proper equipment set-up.**
 - **proper equipment cleaning.....hand break down or an enclosed gun washer.**
 - **operation of spray equipment..HVLV or equivalent technology - 65% transfer efficiency - minimize overspray and waste.**
- **Booth maintenance and filter efficiency** - 98% filter efficiency
- **Enclosed prep stations and spray booths** -
Mobile ventilated enclosures for small panel repair.....
- **Small Panel Repair** - 3 oz. Gun cup - will be exempt!
- **Spray Aerosols:** *If your facility does not apply by spray atomization or only uses hand-held, non-refillable aerosols, airbrush with a maximum paint cup capacity of 3 oz., you could be exempt.*

(see page 1741, 3rd column, "Spray-applied coating operations", topics #1 & #2 of the Rule.)
- **Personal/hobbyist:** *Vehicle exemptions exist - no more than two vehicles per year, NOT for profit.*

NOTE:

If you are a Refinish facility but believe that you are exempt, we recommend that you verify this exempt status with your legal counsel or EPA and obtain any verification or exempt status in writing.

For reference only!



EPA Area Source Rule - Compliance Timeline:

For Existing Facilities

Quick Reference Guide

Applies to any Refinish facility
in operation **BEFORE** 9/17/07

9/17/07

Today

Initial Notification: **MUST** be submitted by 1/11/10.

1/11/10

If compliant now, indicate at this time,
(No follow up needed.)

- BUT -

Facilities NOT compliant for the
Initial Filing (1/11/10):

A. MUST be compliant by 1/10/11,

1/10/11

- AND -

B. MUST file a second notice:
Notification of Compliance Status

(same letter used for the Initial Notification)

by 3/11/11

3/11/11

certifying that compliance was achieved
on or before 1/10/11 - as stated above.

For reference only!



EPA Area Source Rule - Compliance Timeline:

For New Facilities

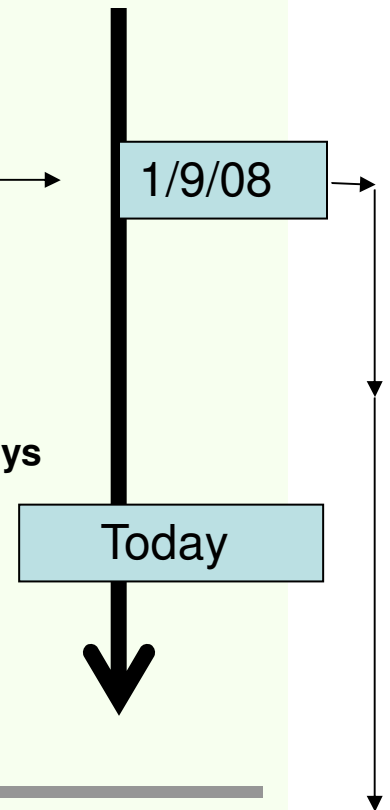
Quick Reference Guide

Which came on line **BETWEEN** 9/17/07 & 1/9/08

- **MUST** be compliant by 1/9/08

New Facilities that came on line **AFTER** 1/9/08

- **MUST** be compliant at start-up!
- **MUST** notify the EPA of compliance within 180 days after start-up via the **Initial Notification**.



Information Resources:

For general ASR information:

<http://www.epa.gov/ttn/atw/area/arearules.html>

Information regarding the ASR can also be found at PPG Refinish.com:

<https://corporateportal.ppg.com/NA/Refinish/PPGRefinish/3-0-SafetyHealth/EN/RulesRegs>

For an example of the Initial Notification letter:

http://www.epa.gov/ttn/atw/area/paint_strip_example.doc

(NOTE: Each state may have its own version of this letter.
Please contact your local authorities)

For reference only!



Required Documents

Surface Coatings Operation Quick Reference Guide

For Owner / Operators:

Records must be kept for 5 years from the date each record is created.

- **The “NOTIFICATION OF CHANGES REPORT”:** *(If applicable)*
(Notification of Changes in compliant status.)
- **Records of any deviations from the requirements of the rule:**
- **Records of any compliance assessments performed in support of the Initial Notification, Notification of Compliance Status, or Notification of Changes Report.**
- **Certification of initial/refresher training for each painter:**
- **Documentation on Booth Filter efficiency from manufacturer:**
Must be 98% or better.
- **Documentation from spray gun manufacturer:**
*For equivalent technologies, (Compliant spray guns)
must certify EPA approval on transfer efficiency - 65% or better.*

For reference only!



Required Documents

Paint Stripping Operations Quick Reference Guide

For Owner / Operators:

Records must be kept for 5 years from the date each record is created.

- **The “NOTIFICATION OF CHANGES REPORT”:** *(If applicable)*
(Notification of Changes in compliant status.)
- **Records of strippers used containing MeCl (Methylene Chloride):**
- **Documentation to verify annual usage:**
If the annual usage is over 1 ton, consult the regulation for additional requirements.
- **Records of any deviations from the requirements of the rule:**

For reference only!



Required Documents

Painter Technicians Quick Reference Guide

Records must be kept for 5 years from the date each record is created.

1. “**Certificate of Completion**” for this course
2. “**Summary of Topics Covered**” - (see page 29 of the Overview handout).
3. The **passing final test** covering topics listed in this rule (see page 27 of the Overview handout).

- **WHEN WILL A NEW HIRE PAINTER
HAVE TO BE TRAINED & CERTIFIED?**

NEW FACILITY:

ALL painters must be certified by **07-07-08** or within **180 days of their hiring date.**

EXISTING FACILITY:

Painters must be trained by **01-10-11** or within **180 days of hiring**, whichever is later

Training is good for a period of 5 years.

The complete text of the rule should be reviewed to fully understand its scope and coverage (see 73 Fed. Reg. 1738, January 9, 2008 and 40 CFR 63.11169 (Part 63, Subpart HHHHHH)).

These “Quick reference Charts 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” is intended to provide INFORMATION for review by PPG's customers. In providing these documents, PPG makes no separate or additional warranties, express or implied, and assumes no liability or responsibility arising out of their use. It is the responsibility of each customer, RE-SELLER AND END USER of PPG's products to independently ascertain that their practices are legal, appropriate and constitute sound product stewardship. These “Quick Reference Charts” are general in nature and are not intended to address site OR PRODUCT-specific issues. Approaches to different issues may vary depending on individual circumstances. These documents are not INTENDED to define or create legal rights or obligations. It is the responsibility of each customer, RE-SELLER AND END USER to comply with federal state and local laws.

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