



PPG Automotive Refinish

Bringing innovation to the surface.™

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Subject: Exemption from HHHHHH Area Source Rule

40 CFR Part 63, Subpart HHHHHH, the National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coatings Operations at Area Sources, also known as the 6H Area Source Rule, regulates facilities that spray apply coatings on metal and plastic substrates. Non-refinish industrial facilities are automatically exempted from the 6H Area Source Rule if they do not use methylene chloride-based strippers or any coatings that contain the target metal HAPs (lead, chromium, cadmium, nickel and manganese) and their compounds above a threshold of 0.1 wt.% for carcinogens and 1.0 wt.% for non carcinogens. No application or notification is needed. However, there is no automatic exemption for auto refinish facilities that meet the same requirements. Refinish facilities must apply for an exemption to either U.S. EPA or to their state or local agency if the agency has been delegated responsibility for administering the 6H Area Source Rule.

The 6H Area Source Rule provisions include spray gun transfer efficiency limits, prep station/spray booth requirements, spray gun cleaning standards, painter training guidelines and recordkeeping requirements. There are also specific rules for operations using methylene chloride-based strippers.

PPG Refinish has developed support documents for facilities subject to the regulation, which can be found on our website at www.ppgrefinish.com. A copy of the 6H Area Source Rule is available on the website, found by clicking on "Safety and Health" in the gray toolbar at the top of the page, and then on "Rules and Regulations" in the drop down list. Painter training classes are available through coatings manufacturers and vocational education programs; some state or local agencies administering the rule may offer classes as well.

If you only use PPG products and you want to determine if you meet the requirements for an exemption, you may use the PPG Refinish website to review your product portfolio for items to avoid. Click on "Safety and Health" in the gray toolbar at the top of the page, then on "Products Containing Metals" in the drop down list. Open the lower pdf on the page "[View products containing Pb, Cd, Cr, Mn, Ni.](#)" Find the product lines used at your facility and review for the codes listed as containing metal HAPs. If your facility uses any of the products on this list and you plan to keep on using them, you are not eligible for an exemption from the 6H Area Source Rule.

For your convenience, a short list of PPG Refinish product favorites that do not contain the target metal HAPs is supplied in the table on the next page. Customers using only these PPG products may be eligible for an exemption (if they don't use non-PPG products containing the target metal HAPs) and don't use methylene chloride-based strippers. The product list in this document is not all-inclusive. There are other PPG Refinish products that do not contain levels of the Area Source Rule listed target metal HAPs above thresholds. You can check metal HAP content by consulting the SDS Hazardous Ingredients (Section 3) for any product. If no compounds are listed that contain lead, cadmium, chromium, manganese or nickel at or above thresholds – you should be able to apply for an exemption from the rule.

If a facility obtains an exemption, then chooses to use or accidentally selects coatings products that contain noncompliant levels of the listed metal HAPs, they should notify the EPA administering party (where they obtained the exemption). They will likely have to file a report with the EPA; it is possible that their exemption could be withdrawn.

**40 CFR Part 63, Subpart HHHHHH, the NESHAP: Paint Stripping and Miscellaneous Surface Coatings Operations
at Area Sources – PPG Automotive Refinish exemption application compliant products**

1. The following products, if used with their TDS recommended ancillary products will not contain target metal HAPs at or above NESHP exemption threshold (0.1% carcinogen, 1.0 wt.% non carcinogen)
2. Use of these products is recommended in this document as of 9/15/16, review the PPG website (www.ppgrefinish.com) for an updated version of this document. Product lists can be revised on an annual basis
3. List is not intended to be all inclusive. Check website www.ppgrefinish.com under "Safety and Health" in toolbar at top of the page then "Products Containing Metals" in drop down list using the "[View products containing Pb, Cd, Cr, Mn, Ni](#)" pdf on that page for products to be avoided. As a final check, review SDS of products selected for use.
4. Where an intermix color system is listed on this page and followed by "only", users MUST pay particular attention to select PPG supplied formulas that are defined for label and SDS -1 designations. NEVER use -3 or -4 when applying for an exemption. Use of -5 color formulas will depend on the particular composition listed in the SDS for that color system and the relative level of metal HAPs listed - compared to allowed thresholds.

<u>Aquabase® Plus</u> P190-6490 P190-6659 P190-6690 P190-6730 P190-6930 P190-6950 P565-312X P565-314X P565-520X P989-1 & -5	<u>Deltron®</u> DPX801 K36 (no lead tints) K38 (no lead tints) NCP250 NCP27X NCP280 NCS200X	<u>Nexa Autocolor® 2K®</u> P190-6100 P190-643 P420/421(lead free) P422 (lead free) P565-301X P565-5005 P565-530X P572-4001	<u>OneChoice®</u> SX1071 SU470LV SU4902 SU4903
	<u>Envirobase® HP</u> ECP1X EC530 EC550 EC700 EC750 ECS2X ECS6X EHP-1 & -5	<u>OMNI®</u> MBC-1 only MBP-1 only MBX-1 only MC260 MC262 MC262 MC270 MC730 MP178 MP235 MP282 MP80x MP895 MTK-1 only MTX-1 only	<u>Shop-Line®</u> JAU-1 only JB-1 only JBP-1 only JBX-1 only JC620 JC630 JC660 JC780 JC830 JP202 JP33x JP365 JP355 JTX-1 only
<u>Deltron®</u> DAS302X DBC-1 only DBU-1 only DC2000 DC3000 DC4000 DC4010 DC4126 DCC-1 only DCU2021 DCU2042 DPLF DPLV305X DPS305X DPS3105 DPX171 (See next column for more Deltron products)	<u>Global Refinish System™</u> BC-1 only D800x D8035 D808X D8126 D8150 D8152 D8188 D839 D893 D894		<u>Value-Pro™</u> P390-4000 P390-4001 P390-4003

Products are included in this table because they do not contain the target metal HAPS at or above allowed exemption thresholds stated in the 6H Area Source Rule. However, other regulations may apply to your use of the products, such as state or local limits on VOC content. It is the responsibility of the jobber and end user to determine whether a particular product complies with federal, state and local regulations.

Use of Aquabase Plus & Envirobase High Performance color would not restrict a user from applying for an exemption from the 6H Area Source Rule. These products do not contain U.S. SDS-reportable levels of the target metal HAPs at or above allowed exemption thresholds in the 6H Area Source Rule. PPG offers support documents specifically for these popular waterborne basecoat systems. For other color systems, note that the recommended intermix color formulas are restricted to PPG supplied "-1" formulas.

It is the responsibility of the formulator in charge to determine the target metal content of all components used to create field matches. PPG Refinish recommendations in this document are based solely on the intermix color match formulas that we provide through PPG's online color and Paint Manager programs.

Check with your state or local air agency to obtain forms or instructions for applying for an exemption from the 6H Area Source Rule. If your state or local agency has not been delegated authority to administer the 6H Area Source Rule, you can contact the regional EPA office for your area. For regional EPA contact information, go to <http://www.epa.gov/epahome/regions.htm>.

An exemption from the 6H Area Source Rule does not exempt the facility from the requirements of any other applicable local, state or federal rule.

This "Exemption from HHHHHH Area Source Rule" document is intended to provide INFORMATION for review by PPG's customers. In providing this document, PPG makes no separate or additional warranties, express or implied, and assumes no liability or responsibility arising out of its 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. This "Exemption from HHHHHH Area Source Rule" document is general in nature and is not intended to address site OR PRODUCT-specific issues. Approaches to different issues may vary depending on individual circumstances. This document is 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.