



PPG Automotive Refinish Small Repair Business Product Stewardship Guidelines

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Disclaimer

This “Small Repair Business Product Stewardship Guidelines” document is intended to provide information for review by PPG’s customers. In providing this “Small Repair Business Product Stewardship Guidelines” document, PPG makes no separate or additional warranties, expressed 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 “Small Repair Business Product Stewardship Guidelines” 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 “Small Repair Business Product Stewardship Guidelines” 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 all federal, state, provincial and local laws.

1. General Guidelines

PPG is committed to marketing products in a responsible manner that protects employees, users, local citizens and the environment. Multiple PPG Refinish paint lines can be used for spot repairs on vehicles. If spot repairs are done outside of a controlled setting (i.e., not in a paint booth), all local regulations must be observed, including but not limited to rules safeguarding workers and the surrounding environment. If larger projects are considered, the vehicle should be repaired in a full service facility.

Before handling PPG products, users should read and understand the information on the label, the product Safety Data Sheet (SDS) and all product use instructions. The SDS and label contain information necessary for the safe handling, storage and use of PPG products including information concerning the health and physical hazards specific to each product.

Operators using PPG products in any environment are expected to follow all safety precautions and use appropriate personal protective equipment.

2. Repackaging Guidelines

In certain cases, it may be necessary to repackage or "pour-off" PPG Refinish paints. Repackaging should take place in a well ventilated area that is equipped for paint handling and designed to contain paint spills. Containers should be appropriate for coatings products, durable and fully resistant to degradation from exposure to those coatings. Labels that indicate correct product codes with warnings and contains statements matching contents must be used on containers intended to store product for more than 8 hours. Under no circumstances should containers of paint be open when not in use.

3. Product for Professional Use Only

Product Stewardship Advisory: Prohibition on Sales to Non-Professionals

PPG takes very seriously the subject of product safety, and PPG's expectation is that users of PPG products will conduct their businesses in the same fashion. To further manage product stewardship, PPG provides its users with product bulletins, SDSs, and other literature. It is the reseller's responsibility to provide these materials to end users.

To reinforce this important message on the safe and proper usage of our products, PPG's product labels expressly state "**for professional use only**". Consequently, selling PPG Refinish products to the DIY market or any NON-PROFESSIONAL CONSUMER is inconsistent with PPG's product safety requirements. PPG cannot and will not be responsible for any claims or problems arising from the advertising or sale by distributors of PPG refinish products to non-professionals.

4. Material Transportation Safety

Some of PPG's products are regulated by the U.S. Department of Transportation as Hazardous Materials. These products must be classified, packaged, marked, labeled, and documented for transportation according to applicable Hazardous Material Regulations found at 49 CFR 105 et seq. . Persons offering or transporting hazardous materials must be trained, tested, and certified according to 49 CFR 172.700. Shipments may require hazardous material shipping papers and emergency response information. Under certain conditions, many of the requirements of 49 CFR

Part 105 et seq. are not applicable if the material is offered and transported as a material of trade. See 49 CFR 173.6.

The intent of the regulation is to allow small users to transport certain quantities of hazardous materials without being subject to the majority of Hazardous Material Regulations. However, users should review the regulations in detail or seek appropriate legal advice to see how this exception may apply to their particular situation.

5. Regulatory Considerations

Coatings products must be selected that comply with auto refinish regulations covering operations at the address of the intended activity. Products are restricted for volatile organic compound (VOC) content following the Federal EPA's national auto refinish rule found at 40 CFR Part 59 Subpart B and also under certain state and local regulations. It is the responsibility of the user to have thorough understanding of all applicable regulations. In certain areas, overlapping federal, state and local (air district) regulations will apply, which may severely limit the range of products that may be applied in those areas. Additionally, there can be restrictions for metal content of coatings products. The local distributor for refinish products should be able to guide users toward compliant products.

Users must be fully aware of federal, state and local regulations with respect to VOC and other potentially harmful emissions before attempting any activity that would generate any such emissions. Please consult PPG's Technical Data Sheets for VOC information for specific ready to spray combinations.

40 CFR Part 63, National Emission Standards for Hazardous Air Pollutants (NESHAP): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, Subpart HHHHHH applies to miscellaneous spray coating operations. If painters use spray guns with reservoir capacity greater than 3 ounces then they would be covered under this regulation. The regulation requires registration with an EPA delegated authority, painter training, HVLP spray guns, recordkeeping and use of spray booths (*or portable vapor collection devices*) among other requirements.

For additional detail on 40 CFR Part 63 Subpart HHHHHHH, the PPG Refinish website www.ppgrefinish.com has numerous support documents. Select "Safety" in the toolbar at the top of the page and "Rules and Regulations" in the dropdown list.

It might be possible to obtain an exemption from the NESHAP regulations by using only products that do not contain target heavy metals (lead, chromium, nickel, cadmium or manganese) as prescribed in the NESHAP regulations. Some PPG automotive refinish coatings can be used within the constraints of the NESHAP exemption. However, a formal exemption application with an EPA delegated authority is necessary (if painters use spray guns with reservoir capacity greater than 3 ounces). Even if the 40 CFR Part 63 Subpart HHHHHHH NESHAP does not apply or the operator has obtained an exemption, there may be other requirements for spray booths or similar devices that would collect, filter and redirect vapors from auto refinish repair repainting operations.

A thorough review of relevant federal, state and local regulations is recommended before initiating activity. An exemption from one regulation does not exempt a user from other regulations. Operators should maintain ongoing open lines of communication with the local EPA regulating authority to ensure complete understanding of the applicable regulations.

When determining a location to complete the auto repair and repainting project, the user must consider the potential impact on the surrounding environment:

1. Choose an area for the repair work that complies with the local, state and federal regulations with considerations for air flow, electrical codes and exposure to ignition sources, among others.
2. Avoid areas near waterways, sewers or manhole covers, near maintenance activities where there might be trenches, in areas where there are sparks or other sources of ignition or in areas near any unusual activity.
3. Conduct work only in a well ventilated, preferably enclosed, segregated zone. Post large signs around the car preparation and painting activities to alert bystanders to the spray painting and other car preparation activities. The signs should also indicate the area to be a NO SMOKING area. When using paint containing isocyanates, post signs alerting bystanders that isocyanate- containing paint is being used.
4. Repair activities should not be conducted in high traffic areas.
5. Provide adequate distance from of all adjacent populations, to ensure paint overspray or other hazardous materials will not contact this population or cause discomfort due to solvent or paint odors
6. Before handling, completely read the label, SDS and product use information.
7. Be fully aware of any emission from the repair activity, including overspray and volatiles.

Parties adjacent to your activity could initiate complaints due to odors released in the auto refinish repair process. Depending on the local sensitivity, duration and (sometimes) subjective interpretations of severity, complaints could fall within nuisance regulations, could be difficult to defend, and could require discontinuation of activity.

Respect for the environment including all inhabitants must always be a high priority, grievances (of any nature) may impact attempts for future activities, and should be addressed as soon as they originate.

Waste collection and disposal regulations intended to protect air, land and water resources will impact the operation, and the user must have a thorough understanding of the required practices and must follow them.

Consult with local EPA representatives for guidance. State and regional (federal) EPA offices can be also contacted for additional support.

6. Worker Safety

Before initiating a project, a user should read and understand relevant information on the label, the product Safety Data Sheet (SDS) and product use instructions. The SDS and label contain information necessary for the safe handling, storage and use of products, including the health and safety and physical hazards. Users must follow OSHA Right To Know guidelines supporting worker awareness.

A user must review and assess the product SDSs, the auto preparation methods, the paint preparation activities, the application methods and the workplace conditions to determine the

potential hazards, the potential for exposure and the appropriate personal protective equipment (PPE) necessary to protect the user.

Users should ensure that the work site has adequate ventilation and should the use safety glasses with side shields or safety goggles and gloves appropriate to each task and product. PPG refinish paint products contain constituents that may cause eye and/or skin irritation, may be absorbed through the skin, and may also cause an allergic skin reaction such as hives or a rash and/or respiratory allergies. Users should become aware of the specific health hazards of the products they are using and take appropriate measures to prevent eye, skin and respiratory system contact by using recommended PPE. A supplied-air respirator with a full facepiece is considered to be the most effective type of respirator in protecting against exposure to isocyanate-containing vapors and spray; however, a safety or industrial hygiene professional should be consulted to perform a hazard assessment to determine PPE recommendations. The assessment and PPE recommendations should be specific to the user, job, products, exposure potential and workplace environment.

7. Responsible Environmental Stewardship

When spray-painting car parts, overspray can escape beyond intended areas of control, and could be a source of contamination resulting in increased human and environmental exposure. Paint overspray can be reduced by following these safe work practices:

1. Use high-volume, low-pressure (HVLP) spray guns to spray primers, basecoats, and clearcoats. When operated correctly, HVLP spray guns have notably higher transfer efficiencies than conventional spray guns. The higher transfer efficiency means more paint materials end up on the car part being painted rather than as overspray.
2. Consult with your PPG paint distributor and spray gun manufacturers to determine the HVLP spray gun settings that optimize transfer efficiencies. The transfer efficiency of HVLP spray guns, and therefore the amount of paint overspray generated, is highly dependent on the spray gun settings selected by the user (e.g., pressure in the air feed line) and on the painter's spraying technique.
3. Train users on proper spraying technique. Studies have shown that, through certain training programs, users can increase their spray transfer efficiencies by improving certain elements of their spray painting technique.
4. Mask off areas near the repair panel to collect overspray and properly dispose.

VOC may be released in the repair painting process. Even without a portable emissions control device, controlling emission vectors should always be a high priority. Select the appropriate location for repairs away from populations and ensure that any emissions are rapidly dispersed to desired effect.

8. Waste Disposal

Waste material must be disposed in accordance with all applicable federal, state, and local environmental control regulations. The regulations applicable to commercial waste generators differ from residential waste generators. Empty containers should be recycled by an appropriately licensed reconditioner/salvager or disposed of through a permitted waste management facility. Disposal information is contained on the SDS for each product, which can be obtained from your

PPG representative. When in doubt, consult with local waste authority and/or site contracted waste disposal service provider.

9. Final Word

Repairs done in an uncontrolled environment must comply with all federal, state and local regulations. An exemption from one rule will not provide an exemption from other overlapping rules (that may call for the same or similar requirements). Users are expected to have a complete understanding of all regulations covering their activities. PPG automotive refinish products are designed "FOR PROFESSIONAL USE ONLY." Properly trained users should be expected to apply the products in the most efficient manner with a minimum of waste. Professional users are expected to control emissions and direct waste streams to the appropriate final disposition. Consideration must always be given to the environment, including impacts on sensitive populations and downstream release of emissions via waterways and weather induced movements. Responsible product stewardship will be an advantage for developing long term relationships with users and their customers.

For additional information, contact PPG Technical Service, PPG Product Stewardship and local government agencies including EPA, SBA environmental ombudsmen and waste authority. When there are discussions on relevant topics, the government agency will have the final word – when any agency supplies guidance, it is always best to get such guidance in writing and to retain copies for your records.