

Affected Sources

Affected sources include facilities that spray-apply coatings onto motor vehicles and mobile equipment where the coatings contain one or more of the following five metal Hazardous Air Pollutants (HAPs):

Chromium (Cr),
Lead (Pb),
Manganese (Mn),
Nickel (Ni), or
Cadmium (Cd)

Check your MSDS. If your facility does not use and will not use coatings containing one of the five HAPs listed above, you MUST request an exemption from the U. S. Environmental Protection Agency.

Or, if your facility does use coatings with the target HAPs, see if you can find a substitute coating that does not contain the target HAPs and petition U. S. EPA for an exemption.

NOTE: * Miscellaneous metal and plastic parts coaters subject to Subpart HHHHHH are covered in a separate brochure.

Methylene Chloride paint strippers are covered in Subpart 6H as well.

Exemptions for Auto Body Coating Section of Rule

- Facilities that use only nonrefillable aerosol containers;
- Facilities or portions of facilities that use airbrush guns with a maximum cup capacity of 3 ounces;
- Coating performed onsite at United States military installations (including Coast Guard and National Guard facilities); and,
- Coatings by individuals for personal or hobby use and not for profit, for no more than two (2) vehicles per year.

An example notification is available at:

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

For more information, contact
West Virginia
Department of Environmental Protection
Small Business Assistance Program
601 57th Street, SE
Charleston, WV 25304
or
(304) 926-0499, extension 1245



Paint Stripping and
Miscellaneous Surface Coating
at Area Sources
(Subpart HHHHHH)



west virginia
department of environmental protection
Small Business Assistance Program

— Motor Vehicle and Mobile Equipment Coating —

What If I Do Not Spray-Apply Coatings Containing One Of The Five Metal HAPs?

You must apply to U. S. EPA in writing to request an exemption and you must be able to show documentation that all products used do not contain metal HAPs (Chromium, Lead, Manganese, Nickel or Cadmium). Your written request must include a description of the coatings you spray-apply and a certification that you do not spray-apply any coatings containing the target HAPs.

All facilities are subject to the rule until they receive an exemption acknowledgement from U. S. EPA. To streamline the process, submit your request for exemption along with your notification.

An example notification is available at:

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

If you use coatings with one of the five metal HAPs, you are subject to Subpart HHHHHH

NEW SOURCES (facilities which commenced construction after September 17, 2007) must have submitted initial** notification as of July 7, 2009 and should be in compliance with the rule upon startup after January 9, 2008.

EXISTING SOURCES (performed coating prior to September 17, 2007) must submit initial notification by January 11, 2010 and be in compliance by January 10, 2011.

Highlights of Subpart HHHHHH Compliance for Spray-Applied Surface Coating

1. Coatings must be applied in filtered enclosure:
 - A. Spray booths/stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed and ventilated at negative pressure or up to 0.05 inches water gauge positive pressure for booths that have seals on all doors and other openings and an automatic pressure balancing system.
 - B. With a filter system demonstrated to achieve at least a 98% capture efficiency.
2. Use of High Volume Low Pressure (HVLP) guns or equivalent.
3. Must limit spray gun cleaning overspray.
4. Painter training is required on proper spray application, setup and maintenance of spray equipment, and environmental compliance.

To view Subpart HHHHHH in its entirety, go to www.epa.gov/ttn/atw/area/fr09ja08.pdf

To view Subpart HHHHHH Fact Sheets, go to www.epa.gov/ttn/atw/area/psmc_fr_fs121407.pdf

NOTE: ** See back for sample notification website.