



Affected Sources

Affected sources include facilities that spray-apply coatings onto metal or plastic parts or products* 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, it is EXEMPT from this portion of the rule.

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.

NOTE: * Auto body coating operations subject to Subpart HHHHHH are covered in a separate brochure.

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

Notification Details

Initial notification informs U. S. EPA that you are affected by the rule and provides some information about your facility.

The initial notification must contain:

- ☒ company name
- ☒ owner/operator name, title, street address, phone, email (if available), and signature
- ☒ street address for location of records if different from above
- ☒ rule title: 40 CFR part 63, subpart HHHHHH
- ☒ description of operations
- ☒ new sources – statement of compliance status *OR*
- ☒ existing sources – may include statement of compliance status and avoid second notification
- ☒ compliance statements differ by operation

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



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

ATTENTION!

Does your facility use coatings which contain:

☒ Chromium (Cr),

☒ Lead (Pb),

☒ Manganese (Mn),

☒ Nickel (Ni), or

☒ Cadmium (Cd)?



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 submit initial** notification by July 7, 2009 and 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. That is, fully enclosed with full roof and at least three complete walls or side curtains.
 - 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 notification details.