



JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES & ENVIRONMENT
LANSING



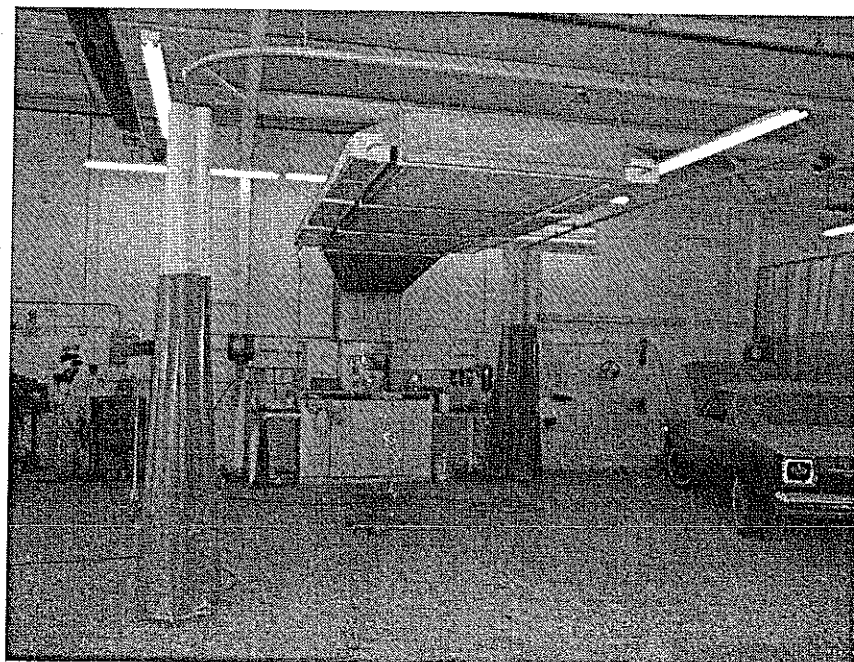
REBECCA A. HUMPHRIES
DIRECTOR

September 15, 2010

Mr. George Czerniak, Branch Chief
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard, AE-17J
Chicago, Illinois 60604-3507

Dear Mr. Czerniak:

The Michigan Department of Natural Resources and Environment (DNRE) is requesting clarification of the provisions of 40 CFR Part 63, Subpart HHHHHH, National Emission Standards for Paint Stripping and Miscellaneous Surface Coating at Areas Sources. Many automotive collision repair facilities in Michigan as well as across the country utilize preparation stations to capture and control the particulate matter from sanding and spray painting. These stations, when operated properly are effective in capturing particulate matter. When sanding, the station is in a recirculating mode. Air flow exiting the plenum above the vehicle creates an air curtain which directs the particulate matter to a trench in the floor containing filters (full downdraft) or to an above ground panel of filters (semi-downdraft). Below is a photo of a typical downdraft preparation station.



Mr. George Czerniak
Page 2
September 15, 2010

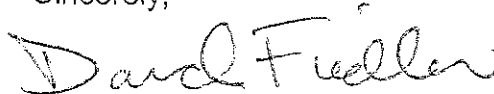
When in the spray painting mode, most preparation stations are equipped with a damper which can direct all or a portion of the air flow outside of the building. When all or a portion of the air flow is directed outside of the building, building makeup air will flow between the curtains and plenum, and then downward to the trench in the floor. Curtains, suspended on tracks along the perimeter of the preparation station area are typically nine feet in height. Preparation stations are used mostly for priming.

According to Section 63.11173(e)(2)(ii) of Subpart HHHHHH "spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, and four complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains."

As long as a shop owner can demonstrate that air is being drawn into the openings and that the overspray is being drawn into the filters, will the preparation station be considered in compliance with the provisions of Section 63.11173(e)(2)(ii)?

I look forward to your response as soon as possible so that we can provide automotive collision shops the guidance needed to meet the January 10, 2011, deadline.

Sincerely,



David Fiedler, Manager
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cc: Ms. Rae Trine, U.S. Environmental Protection Agency
Mr. Vinson Hellwig, DNRE
✓ Mr. Bryce Feighner, DNRE