

The Paint Stripping and Miscellaneous Surface Coating Area Source Rule - A Quick Summary

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Affected Sources

- three affected operations
 - paint stripping operations using Methylene Chloride (MeCl)
 - motor vehicle and mobile equipment repair
 - any manufacturer spray coating plastic and/or metal parts, if coatings contain target HAPs

Exemptions

- hobbyists
 - no compensation
 - no more than 2 vehicles
- maintenance work
 - refinishing of mobile equipment in the field or at the site where they are used in service (e.g., large farm equipment, mining equipment, forklifts)
- research, labs, quality control
- motor vehicle or mobile equipment repair, if don't use coatings with target HAPs
 - must PETITION EPA to get out of rule

Activities included

- Any one of the following:
 - mixing rooms and equipment
 - spray booths, ventilated prep stations, curing ovens and associated equipment
 - spray guns and associated equipment
 - spray gun cleaning equipment
 - equipment used for storage, handling, recovery, or recycling of cleaning solvent or waste paint
 - equipment used for paint stripping at facilities using strippers that contain MeCl
- Except:
 - spray-applied technologies with low or no emissions
 - special coatings - protective, temporary,

Requirements for Paint Stripping

- minimize emissions of MeCl using specific best management practices
- develop a written minimization plan if use more than 1 ton MeCl in year, and post in shop
 - no written plan required if under 1 ton (150 gallons)
 - but follow general content of minimization plan

Requirements for Surface Coating

- painters must be certified as completing training
 - owner/operator certifies
- spray-applied coatings must be applied in enclosure with 98% efficient filter system
 - booths need 3-4 walls and roof, depending on parts
- apply coatings with specified application technologies
- spray gun cleaning operation should prevent atomized mist or avoid spraying outside container used to collect waste solvent

Requirements for Surface Coating

- all personnel, including contractors, who spray apply coatings must be trained
 - refresher every 5 years
- training program must include:
 - spray gun equipment selection, set up, and operation
 - best spray technique for different types of coatings to improve transfer efficiency and minimize overspray
 - routine booth and filter maintenance, filter selection and installation
 - compliance with requirements of the NESHAP

Recordkeeping

- Paint stripping
 - inventory of MeCl stripping materials and usage
 - copy of minimization plan kept on site, if using more than one ton of MeCl in calendar year
- Surface coating
 - painter training certification
 - documentation of filter efficiency
 - copies of all notifications and reports required
- Both: records of any deviations from requirements

Deadlines

- Initial Notification and Compliance Status
 - New sources - July 7, 2008
 - Existing
 - Initial (and Compliance) - January 11, 2010
 - Compliance - March 11, 2011
- Annual Reporting
 - March 1 - only if changes occurred during previous calendar year

Paint Rule - Tools

What is available or coming soon?

Panel and Open Discussion

Tools

- Notification and Petition forms - Teresa Shifflet, GA
 - <http://www.gasmallbiz.org/Georgia%20Initial%20Notification-Compliance%20Final%20Form.pdf>
- Collision Repair Campaign materials - Holly Wilson, EPA
- FAQ from Tech Subcommittee - Renee Bashel, WI
 - <http://www.smallbiz-enviroweb.org/sba/technicalfiles/FAQonPSMSC.pdf>

Tools

- Texas tools

- <http://www.tceq.state.tx.us/assistance/sblga/neshap6h.html>

- Indiana forms

- <http://www.in.gov/idem/5132.htm>

What is still needed?

- Comparison of booth requirements?
EPA/OSHA/NFPA
- Example MeCl minimization plan?
- ...
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