

Agenda

- Background / History of Federal Clean Air Legislation
- New Federal Rule
- State Requirements
- Bernalillo County Requirements

Congressional Air Acts

- 1955, 1963, 1967
- 1970 Clean Air Act (CAA), EPA created
- 1977 CAA Amendments
- 1990 Major CAA Amendments – including regulations of sources of Hazardous Air Pollutants (HAPs).

This includes emissions standards for major and area sources of HAPs.

New Federal Rule

40 CFR Part 63 Subpart HHHHHH
(Hex H or 6H)

January 9, 2008

National Emission Standards for Hazardous
Air Pollutant (NESHAP):

Paint Stripping and Miscellaneous Surface
Coating Operations at Area Sources; (Final)

Hex H has three main parts:

- 1. Paint Stripping:** specifically for the use of Methylene Chloride (MeCl).
- 2. Miscellaneous Surface Coating :** specifically spray application of coatings to plastic or metals that contain the **Target HAP (Hazardous Air Pollutant) compounds.**
 - 1) Cadmium (Cd), 2) Chromium (Cr), 3) Lead (Pb),
 - 4) Nickel (Ni), and 5) Manganese (Mn).
- 3. Motor Vehicle and Mobile Equipment Surface Coating:** this includes **all** autobody refinishing operations whether or not they use coatings that contain any Target HAPs!

Exemptions from Hex H

While there are some exemptions for stationary objects that cannot be moved into dedicated paint booths and some facility maintenance activities, there are not a lot of exempted operations.

Hobbyists may be exempt, but if they spray paint two or more vehicles annually, they are not exempt regardless of whether compensation is received.

Facilities only using air brushes or spray guns with less than 3 oz. capacity are exempt.

Facilities can be granted an exemption from this regulation if they can demonstrate to the Administrator that they do not use the Target HAPs.

Paint Stripping Requirements

1. Evaluate:

If substrate can be repainted without stripping.
If other paint stripping technology can be used.

2. Reduce:

Exposure of all MeCl strippers to air.
MeCl evaporation as much as possible (low temps).

3. Contain:

Practice proper storage and disposal of MeCl strippers (e.g., store in closed, air-tight containers).

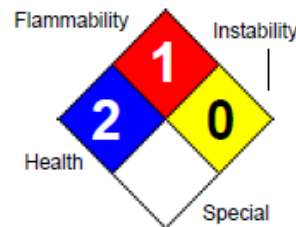
4. Develop:

A MeCl minimization plan **if more than one ton** of MeCl is used annually.

MATERIAL SAFETY DATA SHEET

Klean-Strip Aircraft Remover

HEALTH		2
FLAMMABILITY		1
PHYSICAL HAZ.		1
PPE	B	



Printed: 03/27/2008
 Revision: 09/04/2007
 Supersedes Revision: 02/16/2006
 Date Created: 04/19/2005

1. Product and Company Identification

Product Code: QAR343
Product Name: Klean-Strip Aircraft Remover
Manufacturer Information

2. Composition of Ingredients

Hazardous Components (Chemical name)	CAS#	Concentration
1. Dichloromethane {Methylene Chloride}	75-09-2	60.0 – 90.0%

Other Paint Stripping Requirements

One option used to strip paint is to use a grinding tool to remove old paint from a vehicle.

However, some old paints contain Lead (Pb) and it is harmful to breath lead paint dust. Additionally, lead-containing dust must be collected and disposed of as a hazardous waste.

Hex H Spray Painting Requirements:

- Spray painting technician **training**.
- All spray coating applied in a **spray booth**.
- All spray coatings must be applied with a high-volume, low pressure (**HVLP**) **spray gun**, electrostatic, airless/air assisted, or equivalent technology demonstrated by the manufacturer to achieve efficiency comparable to one of the spray gun technologies listed above.....
- **Spray gun cleaning** must be done so that an atomized mist of solvent and paint residue **is not created** outside of a container that collects this material.

Training: Motor vehicle and mobile equipment surface coating operations

Must certify that all spray painting technicians have completed training. The Hands-on and Classroom training may be performed by the facility operator, and must include:

1. Spray gun equipment selection, set up and operation, including nozzle selection, spray pattern, air pressure and volume, and paint delivery rate.
2. Spray techniques to improve transfer efficiency and minimize overspray.
- 3. Routine spray booth and filter maintenance.**
- 4. Environmental compliance with this regulation.**

Spray Technician Training and Certification

Owner/Operator must ensure and certify that **all new and existing personnel, including contract personnel**, who apply spray coatings have this training.

Owners who can document or certify that a painter's work experience and/or training is equivalent to that required do not have to provide the initial training. **Training is required every five years.**

Training may be performed by ICAR, automotive paint manufacturer's courses, or other industry representatives; currently no program or course certification is required.

Spray Technician Training Timelines:

New Source (in operation after September 17, 2007) : Personnel must be trained and certified no later than 180 days after hiring, or no later than **July 7, 2008**.

Existing Source: Personnel must be trained and certified no later than 180 days after hiring, or no later than **January 10, 2011**.

Painters that have received training prior to the dates above satisfies this requirement but training is valid only five years after it is received.

Spray Gun Cleaning

Must be done so that an atomized mist or spray of gun cleaning solvent is not created outside of a container that collects used gun cleaning solvent.

May be done with hand cleaning of parts of a disassembled gun, by flushing solvent through a gun without atomizing the solvent, by using a fully enclosed spray gun washer, or a combination of these.

The most effective way to clean spray guns is with an enclosed gun washer.

Gun Cleaner Systems



These reduce the amount of solvent used, reduce exposure to solvent, and make it easy to ship out paint waste residue.

Water Cleaning Systems



Aqueous cleaning systems use water-based detergents and are used to eliminate the use of hazardous solvents.

Solvent Saver for Cleaning Paint Lines

- Cleans fluid lines while using less solvent.
- Forces both compressed air and solvent through the hose for both chemical and mechanical cleaning.



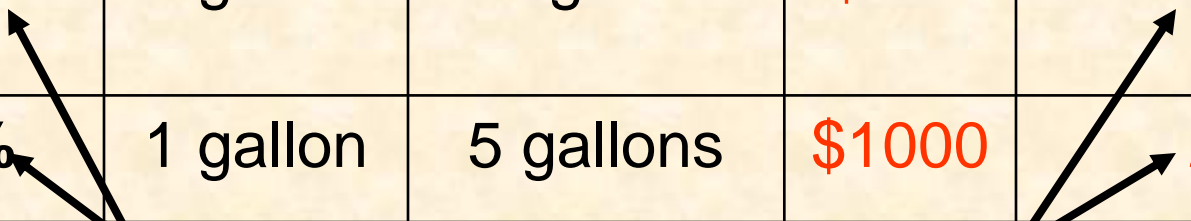
Spray efficiency requirements

All spray applied coatings must be applied with a HVLP spray gun, electrostatic application, airless or air assisted airless spray gun, or an equivalent technology that is **demonstrated by the manufacturer to achieve transfer efficiency of one of the technologies listed above.**

Transfer Efficiency, Cost, and VOCs

For \$200/gallon coating:

Transfer Efficiency	Start with	Total applied	Cost	VOCs emissions (lb/hr)
80%	1 gallon	1.25 gallons	\$250	5
60%	1 gallon	1.66 gallons	\$332	6.64
40%	1 gallon	2.5 gallons	\$500	10
20%	1 gallon	5 gallons	\$1000	20



Applying for a state permit, wasted paint, excessive overspray and fog!

Hex H Spray booth requirements:

- All spray-applied coatings **must be applied in a spray booth, prep station, or mobile enclosure.**
- All booths, stations and enclosures must be fitted with a filter technology that achieves at least **98% capture of overspray.**
- Booths for refinishing of complete motor vehicles or mobile equipment must have **four walls or side curtains, and a roof, with negative pressure ventilation.**
- Miscellaneous parts or vehicle subassemblies must have **3 walls or curtains and a roof, and must be ventilated so air is drawn into the booth.**

Spray Booths and Spray Areas



Closed Spray Booth



Open Spray Area

Both must have the ventilation required to comply with both Hex H and OSHA regulations!

Hex H Spray Booth requirements:

All spray booths, prep stations or mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least **98% capture of paint overspray**. Owner/operators may use published filter efficiency data provided by filter vendors.

Filter Performance Summary	
Total Penetration:	8.8 Grams
Average Arrestance Efficiency:	98.66%
Holding Capacity:	0.41 Lbs/Ft²
For a 20" x 20" Pad:	1.14 Lbs

Hazardous Waste Compliance

Spray booth filters are used for collecting particulates that may contain Target HAPs, especially chromium. While the solvents evaporate, these can collect on the filters and can potentially be hazardous waste.



Am I a New or Existing Source?

Requirement dates are different for new or reconstructed sources vs. existing sources.

New or reconstructed sources: in operation after September 17, 2007.

Existing sources must have been in operation before September 17, 2007.

Compliance Dates

Compliance Date for Hex H:

- For existing sources, compliance date is **January 10, 2011**.
- For new or reconstructed sources after September 17, 2007, compliance date is **January 9, 2008**.

Personnel training:

- For existing sources: **No later than 180 days after hiring or no later than January 10, 2011**.
- For new or reconstructed sources: **No later than 180 days after hiring or no later than July 7, 2008**.

Hex H Reporting Requirements

Initial Notification to EPA/State:

For existing sources: No later than January 11, 2010.

For new or reconstructed sources: No later than 180 days after startup or no later than July 7, 2008.

Reporting Requirements

Notification of Compliance Status:

If you are the owner operator of an existing source, and you did not verify your compliance status in your Initial Notification, then you must submit a Notification of Compliance Status on or before March 11, 2011.

If you are the owner/operator of a new/reconstructed source, you are not required to submit a Notification of Compliance Status if you were able to verify compliance with the regulation in the Initial Notification.

Recordkeeping and Reporting Requirements:

Annual Reporting requirements:

Annual Notification of Changes: Reports the MeCl minimization plan and must be sent in no later than March 1 of the following calendar year after the Initial Notification.

Primarily for changes (increases) in MeCl usage, especially if usage is near or over 1 ton per year.

Recordkeeping

Recordkeeping Requirements:

1. Spray Technician Training Certification
2. Documentation of Spray Booth Filter Efficiency
3. Documentation of Transfer Efficiency from Spray Gun Manufacturer
4. Copies of any Notifications to EPA/State
5. Records of deviation from regulation requirements (date, time period and nature of deviation)
6. Records that support Initial Notification and Compliance Status

MeCl Recordkeeping

Recordkeeping Requirements:

1. Annual usage of strippers containing MeCl including MeCl content of strippers
 - If more than 1 ton MeCl used annually: MeCl Minimization Plan
2. Records must be kept on-site for two years, and may be kept off site after that; all records must be kept for a total of five years.

State of New Mexico

Exemption for Spray Painting Operations

We'll talk about this more next time!

<p>Mail Application To: New Mexico Environment Department Air Quality Bureau New Source Review Unit 2048 Galisteo Santa Fe, NM 87505</p> <p>Phone (505) 827-1494 http://www.nmenv.state.nm.us</p>		<p>Application No. _____</p> <p>AIRS No. 35 - -</p> <p><i>For NMED use only</i></p>
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Air Quality Notice of Exemption Under 20.2.72.202.B NMAC

Under Section 202.B of Part 2.72 – [Air Quality] Construction Permits, the presence of new or modified sources and activities exempted at a facility must be reported in the permit application forms supplied by the Department. Emissions from sources and activities exempted under Section 202.B are not included in the calculation of the facility-wide potential emission rate under Paragraphs 1 or 2 of Subsection A of 20.2.72.200 NMAC.

www.nmenv.state.nm.us/aqb

Air Quality Penalties

If you choose to ignore the law and are in violation you can be fined thousands of dollars.

So play it safe comply with the regulations and keep good records.

Need Help?

To obtain forms or if you need further information about painting and coating regulations at:

**Air Quality Bureau Small Business
Environmental Assistance Program**

Steve Dubyk 1-505-222-9507 or

Rosanne Sanchez 1-505-222-9583

SBEAP website: www.nmenv.state.nm.us/aqb

Air Quality Home
Application Forms
Asbestos
Compliance
Contact Us
eIDEA Portal
Indoor Air
Kid's Page
Modeling
Monitoring
Air Monitoring Data
Open Burning
Permitting

Air Quality Bureau




Small Business Environmental Assistance Program (SBEAP)

The Small Business Environmental Assistance Program (SBEAP) provides publications and

The following links will take you to specific information:

[Frequently Asked Questions about Air Quality Regulations and Permitting](#)

 [Information for Small Business Industry Sectors](#), including:

- Painting and Coating Operations
- Perc Dry Cleaning Operations
- Wood Products Manufacturing
- Abrasive Blasting Operations
- Aggregate, Asphalt, and Concrete Batch Plants
- Reinforced Composite Plastic and Cultured Marble Operations

[Links to Other State and Federal Small Business Web Sites](#)

[Small Business Assistance Providers in New Mexico](#)

If you need more information and guidance regarding air quality permitting and your business, you can contact the Air Quality Bureau's Small Business Environmental Assistance Program at (505) 222-9507 or 222-9583.

Applicability for Bernalillo County

Any person owning or operating any commercial or industrial stationary source, which emits more than two thousand pounds of any air contaminant per year or any amount of a hazardous air pollutant, must obtain a Registration Certificate for the source from the Director.

Current Costs for Small Business

- \$250.00 APPLICATION FEE ($\frac{1}{2}$ PRICE)
- \$150.00 ANNUAL FEE

Proposed Costs for Small Business

(Potentially by April 2009)

- \$1500.00 APPLICATION FEE ($\frac{1}{2}$ PRICE)
- \$300.00 ANNUAL FEE
- Fee Hearing – February 11, 2009

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Thank you for listening to us!

Special Thanks to:

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Jim Maddox

ASA Members