

# COMPLIANCE ASSISTANCE ADVISORY

# NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) FOR SOURCES ENGAGED IN PAINT STRIPPING AND SURFACE COATING OF MOTOR VEHICLES AND MOBILE EQUIPMENT

On January 9, 2008, the Environmental Protection Agency (EPA) published the rule regulating emissions of hazardous air pollutants (HAPs) from autobody refinishing shops. Facilities potentially affected by the rule are motor vehicle and mobile equipment surface coating operations that spray coatings that contain compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), referred to as target HAPs.

The District would like all autobody refinishing shops to verify with their paint distributors and / or paint manufactures if the coatings or primers they are using contain any of the target HAPs.

## **Additional Requirements for Materials that contain HAPS:**

If your facility is using materials containing any of the target HAPs you are subject to the following requirements:

- 1. Train and certify all painters on spray gun equipment selection, spray techniques, maintenance, and environmental compliance.
- 2. Train and certify all personnel who spray apply surface coatings no later than 180 days after hiring.
- 3. Proper operation of spray booths and filter systems.
- 4. Recordkeeping
- 5. Submit an initial notification and notification of compliance form

The initial notification and notification of compliance form can be found using the following link:

 $\frac{http://www.vcapcd.org/pubs/Engineering/permits 2000/Forms/6 Hinitial Notification And Notification}{Of Compliance.pdf}$ 

### Additional Requirement for Materials that DO NOT contain HAPs:

If your facility is using materials that do not contain any of the target HAPs, you shall submit a Petition for Exemption Form (6H Form). A new petition for exemption form must be submitted *each time* the facility changes paint lines.

A Petition for Exemption (6H Form) can be found using the following link: <a href="http://www.vcapcd.org/pubs/Engineering/permits2000/Forms/6HpetitionForExemption.pdf">http://www.vcapcd.org/pubs/Engineering/permits2000/Forms/6HpetitionForExemption.pdf</a>

### Where to submit the forms:

If your facility has a current permit to operate and has made a change to the paint line, please submit your form to Wunna Aung, an Air Quality Engineer, at <a href="www.wunna@vcapcd.org">wunna@vcapcd.org</a>.

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If your facility is applying for a permit to operate, please submit your form to Laura Kranzler, a Permit Processing Specialist, at <a href="mailto:laura@vcapcd.org">laura@vcapcd.org</a> along with all other required application materials.

For further information refer to a brochure prepared by the EPA at <a href="www.epa.gov/ttn/atw/area/paint\_stripb.pdf">www.epa.gov/ttn/atw/area/paint\_stripb.pdf</a>, or contact Tod Neilan at (805) 645-1476 or tod@vcapcd.org.

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