

Who Can Help?

Environmental Compliance Assistance for Small Business



Tennessee Small Business Environmental Assistance Program (SBEAP)

The SBEAP provides technical, administrative and regulatory support for small businesses. The SBEAP staff serves as a liaison between the regulatory agency and the small business owner.

Confidentiality is maintained when representing the interest of a small business. The types of assistance provided through the SBEAP include:

- Informing businesses of regulatory requirements that apply to them and the applicable compliance dates
- Developing and maintaining a list of affected industry to distribute compliance information
- Disseminating up-to-date regulatory information to the small business community, including easy-to-understand public information material
- Helping small businesses with specific technical, administrative, and compliance problems
- Making necessary referrals to assist businesses with specific environmental problems
- Providing training opportunities

1-800-734-3619

BGSBEAP@tn.gov

<http://state.tn.gov/environment/ea/sbeap>

To reach your local ENVIRONMENTAL FIELD OFFICE

Call 1-888-891-8332 OR 1-888-891-TDEC



The Tennessee Department of Environment and Conservation is committed to principles of equal opportunity, equal access and affirmative action. Contact the EEO/AA Coordinator or the ADA Coordinator at 1-866-253-58277 for further information. Hearing impaired callers may use the Tennessee Relay Service (1-800-848-0298).

Tennessee Department of Environment and Conservation
Authorization No 327245, 11,000 copies. This public document was promulgated at a cost of \$0.07 per copy.
October, 2009.

Summary of Regulations Controlling Air Emissions from

PAINT STRIPPING AND MISCELLANEOUS SURFACE COATING OPERATIONS



National Emission Standards For Hazardous Air Pollutants (NESHAP)

**40 CFR 63
SUBPART HHHHHH
FINAL RULE**

Tennessee Small Business Environmental Assistance Program



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PAINT STRIPPING AND MISCELLANEOUS SURFACE COATING OPERATIONS (SUBPART HHHHHH)



What Is an Area Source for Hazardous Air Pollutants (HAPs)?

- Any source that is not a major HAPs source

(A major HAPs source is a facility that emits, or has the potential to emit in the absence of controls at least 10 tons per year (TPY) of a single HAP or 25 TPY of combined HAPs.)

Who Does This Rule Apply To?

- Area sources that engage in any of the following:
 1. Paint stripping operations that use methylene chloride (MeCl, CAS# 75-09-2)-containing paint stripping formulations
 2. Spray application of coatings to motor vehicles and mobile equipment
 3. Spray application of coatings (miscellaneous surface coating) to a plastic and/or metal substrate where the coatings contain compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd)

NOTE:

Motor vehicle or mobile equipment surface coating operations may petition for an exemption from this Rule. A facility must demonstrate, to the satisfaction of the delegated authority, that no spray applied coatings contain compounds of the Rule's target HAPs or an Occupational Safety and Health Administration (OSHA)-defined carcinogens (See 29 CFR 1910.1200(d)(4)).

Exemptions

Exempted Surface Coating or Paint Stripping Activities:

- Operations performed onsite at Armed Forces installations
- Military munitions or equipment used for transporting munitions
- Surface coating or paint stripping performed by individuals on their personal vehicles, property or possessions either as a hobby or for maintenance of their personal vehicles, possessions, or property provided they coat no more than two vehicles a year.
- Rule defined research and laboratory
- Rule defined quality control
- Activities covered under another area source Rule

Spray-Applied Applications Exemptions

- Hand-held device with a cup capacity no more than 3.0 fluid ounces (89 cc)
- Powder coating
- Hand-held, non-refillable aerosol containers
- Thermal spray operations using solid metallic or non-metallic materials
- Non-atomizing technology
 - brushes, rollers, hand wiping
 - coating techniques – flow, dip, electrodeposition, web, coil
 - touch up markers or marking pens
- HVLP spray guns used for certain coatings on aerospace vehicle components

Types of Coatings Exemptions:

- Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination
- Paper film or plastic film that may be pre-coated with adhesive
- Adhesives, sealants, maskants, or caulking materials
- Temporary protective coatings, lubricants, or surface preparation materials
- In-mold coatings that are spray-applied in the manufacture of reinforced plastic composite parts
- Coatings that meet the rule definitions of **Facility maintenance** or **Space vehicle**

Training Program Exemptions:

- Students of accredited surface coating training programs
- Students under the direct supervision of an instructor who is certified

What Am I Required To Do?

Paint Stripping Operations

- Implement management practices that minimize emissions of methylene chloride (MeCl) [also listed as dichloromethane].
 - Evaluate the need for paint stripping (e.g., is it possible to re-coat without stripping?).
 - Evaluate each application to identify potential alternative stripping methods.
 - Reduce exposure of strippers to air.
 - Optimize application conditions.
 - Practice proper storage and disposal.
- For each paint stripping operation with **greater than** 1 ton methylene chloride annual usage, develop and implement a written Methylene Chloride Minimization Plan.
- Must post an outline of the Plan where methylene chloride stripping is done.
- No Minimization Plan is needed if usage is **less than** 1 ton methylene chloride. However, sources must still utilize work practices to minimize emissions of methylene chloride.
- Maintain records of annual usage of paint strippers containing methylene chloride.
- Area sources' annual usage of methylene chloride cannot exceed 181 gallons.

Note: Consult the MSDS sheet to identify the amount of methylene chloride (**CAS# 75-09-2**) contained in the paint stripper formulations.

Motor Vehicle / Mobile Equipment and Miscellaneous Surface Coating Operations.

- Train/certify all painters on spray gun equipment selection, spray techniques, maintenance, and environmental compliance (See rule).
- Train and certify all personnel who spray apply surface coatings no later than 180 days after hiring or by July 7, 2008 (new sources) or by January 10, 2011 (existing sources).
- Painters must take a refresher course and recertify every five years.

Surface Coating Operations Continued

Spray Booths:

- Install/operate filter technology on all spray booths/stations/enclosures to achieve at least 98% capture efficiency.
- Spray Booths used to refinish **complete** motor vehicles or mobile equipment:
 - Must be fully enclosed and ventilated at the proper pressure
- Spray Booths used to coat miscellaneous parts or products or vehicle subassemblies:
 - Must have a full roof, at least three complete walls or side curtains, and ventilated so that air is drawn into the booth
- Mobile ventilated enclosures for spot repairs:
 - Must be fully enclosed with overspray retained and directed to a filter for capture

Spray Guns:

- Spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless or air-assisted airless spray gun, or an equivalent technology.
- Paint spray gun cleaning must be done so that an atomized mist or spray of the cleaning solvent is not created outside a container that collects used gun cleaning solvent.

All Operations

Notifying:

- Initial Notification (informs appropriate air regulatory agency that the facility is subject to the standards)

New Sources:

Due by July 7, 2008 or 180 days after startup

Existing Sources:

Due by January 11, 2010

- Notification of Compliance (certifies that the source is in compliance with the applicable rule requirements)

New Sources:

Must include compliance certification statement in the Initial Notification

Existing Sources:

Due by March 11, 2011

All Operations Continued

Reporting:

Annual Notification of Changes report

Required before March 1st of each calendar year if any reportable changes occurred

Recordkeeping:

Keep the following records on file for review

- Copies of Notifications/Reports submitted to the appropriate air regulatory authority for your area
- Painter training certifications with training dates
- Spray booth filter efficiency documentation
- Spray gun transfer efficiency
- Content information (MSDS) on paint strippers, paint, thinners and other surface covering material used
- Annual usage of Methylene Chloride for paint stripping
- Written copy and annual review of Methylene Chloride Minimization Plan [if methylene chloride usage is greater than one ton per year]
- Deviation and corrective action documentation

Where Do I Submit Applications / Notifications?

Tennessee has five air pollution control regulatory agencies. You should submit the information to the air pollution regulatory agency with delegated authority for this rule for your area.

Sources **not** located in Davidson, Knox, Hamilton or Shelby counties should submit to:

TN Department of Environment and Conservation
Division of Air Pollution Control
Call: 615-532-0554

There are four local air pollution control authorities that regulate sources in the following counties:

- [Davidson County](#) - (615) 340-5653
- [Hamilton County](#) - (423) 643-5970
- [Knox County](#) - (865).21-.5900
- [Shelby County](#) - (901) 544-7775

What are the Compliance Dates?

New Sources:

- **Upon startup after January 9, 2008**
Newly hired painters must be trained and certified no later than 180 days after hiring or by July 7, 2008, whichever is later.

Existing Sources:

- **By January 10, 2011**
Newly hired painters must be trained and certified no later than 180 days after hiring or by January 10, 2011, whichever is later.

How can I tell if I am a New or Existing source?

New source

- Commenced construction after September 17, 2007 by installing new paint stripping or
- Commenced using surface coating equipment at a source not actively engaged in paint stripping and/or miscellaneous surface coating prior to September 17, 2007

Existing source

- Commenced construction or reconstruction before September 17, 2007

What are the Permitting Requirements?

- Check with your air regulatory authority on required permitting.
- There may be other Air Pollution Control Rules affecting your facility.

Where can I find more information about this Rule?

- Tennessee Small Business Environmental Assistance Program (SBEAP) webpage for **Surface Coating and Paint Stripping**
http://tn.gov/environment/ea/sbeap/sbeap_paintstr.shtml

For more Environmental Assistance Contact
Tennessee Small Business Environmental Assistance Program (SBEAP)
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