

Area Source NESHAP 40 CFR 63 Subpart HHHHH

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COMPLYING WITH THE EPA "6H" RULE FOR AUTO BODY SHOPS

Office of Environmental Services

- Assistant Secretary: Sam Phillips

Air Permits Division

- Administrator: Tegan Treadaway

Petrochem

petroleum facilities, chemical
manufacturing facilities, Oil and Gas

- Manager: Victor Chu

Manufacturing

power plants, saw mills, painting and
sandblasting, asphalt plants, and
miscellaneous

- Manager: Lance Green

What Are Area Source NESHAPs?

- **Clean Air Act (CAA)** requires EPA to identify at least 30 HAPs that pose the greatest potential health threat in Urban areas;
- The **CAA** also requires EPA to identify and list the area source categories that represent 90 % of the 30 urban HAP emissions & subject them to standards under the CAA (section 112(d)).
- **EPA** has identified a total of **70 area source categories** which represent 90 % of the 30 identified urban HAPs.

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Paint Stripping and Miscellaneous Surface Coating Operations



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Paint Stripping and Miscellaneous Surface Coating Operations

Who Does this Apply To?

- Area Sources engaged in any of the following!
 1. *Paint Stripping utilizing MeCl (methylene chloride).*
 2. *Spray Application of Coatings to motor vehicles and mobile equipment.*
 3. *Spray Application of Coatings to a plastic and/or metal substrate where the coatings contain compounds of:*
 - *Chromium (Cr)*
 - *Lead (Pb)*
 - *Manganese (Mn)*
 - *Nickel (Ni)*
 - *Cadmium (Cd)*

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Who Does this NOT Apply To?

- Surface Coating at installations owned by Armed Forces, NASA, or NNSA
- Surface Coating of military munitions or equipment for transporting exclusively military munitions
- Surface coating and paint stripping for personal use by individuals
- Research and Laboratory Activities as defined
- Quality Control Activities as defined
- Surface coating or paint stripping covered under another area source NESHAP

Are there any exemptions?

- Motor vehicle or mobile equipment may apply for exemption if can demonstrate NO Coatings are spray applied that contain the Target HAPs (chromium, lead, manganese, nickel, or cadmium). [40 CFR 63.11170(a)(2)]

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The NESHAP applies, what must I do?

1. *Paint Stripping Operations [40 CFR 63.11173(a)-(d)]*
 - *Implement Manage Practices to minimize emissions of MeCl.*
 - *Can I recoat w/o removing existing coating?*
 - *Can I strip paint with something other than MeCl?*
 - *Reduce exposure of all MeCl paint strippers to air*
 - *Optimize application procedures to reduce MeCl evaporation (i.e., avoid heating MeCl as much as possible)*
 - *Properly store MeCl paint stripper (closed, air tight containers)*
 - *If operations use > 1 ton of MeCl annually:*
 - *Develop and implement a written MeCl minimization plan containing above info.*
 - *Sign showing MeCl minimization plan must be in each location where MeCl paint stripping occurs.*
 - *Maintain copy of MeCl minimization plan on-site.*
 - *Maintain records on-site of annual usage of paint strippers containing MeCl*

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Paint Stripping and Miscellaneous Surface Coating Operations

The NESHAP applies, what must I do?

2. *Motor Vehicle/Mobile Equipment and Misc. Surface Coating Operations [40 CFR 63.1173(e)-(g)]*
 - *Train and certify painters on spray gun equipment, technique, maintenance, and environmental compliance.*
 - *Install and operate filter technology on all spray booths to achieve 98% capture efficiency. Spray booths used to refinish entire vehicles or mobile equipment must be fully enclosed (4 complete walls/curtains + roof) and ventilated per the standards.*
 - *Negative pressure, unless ...*
 - *Seals on all openings w/automatic pressure balancing system. May then use up to 0.05" H₂O (gauge) positive pressure.*
 - *Spray stations used to coat misc. parts or products or vehicle subassemblies must have 3 complete walls/curtains + roof, and ventilated so that air is drawn into the booth.*

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Paint Stripping and Miscellaneous Surface Coating Operations



The NESHAP applies, what must I do?

2. *Motor Vehicle/Mobile Equipment and Misc. Surface Coating Operations [40 CFR 63.1173(e)-(g)]*

- *Mobile enclosures used to perform spot repairs must enclose the area and route paint overspray to a filter.*
- *Spray applied coatings must be applied using HVLP spray guns, electrostatic methods, airless spray guns, air assisted airless spray gun or other equivalent technology as approved by LDEQ in writing.*
- *Proper spray gun cleaning techniques (Don't atomize the solvent w/o full enclosure!)*
- *Train and certify all personnel who spray apply coatings no later than 180 days after hiring or by July 7, 2008 (new sources) or by January 10, 2011 (existing sources).*

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Paint Stripping and Miscellaneous Surface Coating Operations



Important Dates:

- ***Existing Sources (Commenced construction prior to January 9, 2008):***
 - *January 10, 2011*
 - *Meet compliance requirements!*
 - *January 11, 2010*
 - *Initial notification due.*
 - *March 11, 2011*
 - *Notification of Compliance Status due.*
- ***New Sources (Commenced construction after September 17, 2007 not actively engaged in paint stripping or surface coating prior to September 17, 2007):***
 - *January 9, 2008*
 - *Meet compliance requirements upon startup or by January 9, 2008 whichever is later.*
 - *July 7, 2008*
 - *Submit initial notification within 180 days of startup or by July 7, 2008 whichever is later. Notification of Compliance Status does NOT need to be submitted.*
- ***ALL Sources***
 - ***Submit Annual Certification of Changes report each calendar year any change occurs. “Change” means any info changes from that submitted in any of the above notifications, or in previous versions of the Annual Certification of Changes.***

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Paint Stripping and Miscellaneous Surface Coating Operations



What Should the Required Notifications Include?

- Notification of Compliance Status
 - Company name
 - Name, title, street address, phone number, email address (if available), and signature of the owner and operator (or other certifying official)
 - Street address of the source and street address where records will be maintained.
 - Are you in compliance with 40 CFR 63 Subpart HHHHHH?
 - Certify that you are in compliance and that everything in the report is true, accurate and complete.
 - If not in compliance, note what you are doing to get into compliance.
 - If using > 1 ton per year of MeCl, certify that you have developed and are implementing MeCL minimization plan in accordance with 40 CFR 63.11173(b).

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What Should the Required Notifications Include?

- Annual Notification of Changes Report
 - Whatever has changed from the last Annual Notification of Changes Report, Notice of Compliance Status, or Initial Notification.
 - Company name
 - Name, title, street address, phone number, email address (if available), and signature of the owner and operator (or other certifying official)
 - Street address of the source and street address where records will be maintained.
 - Must be submitted prior to March 1 of each calendar year when reportable changes have occurred.

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Paint Stripping and Miscellaneous Surface Coating Operations



Recordkeeping:

- *Copies of Notifications submitted (see previous slide)*
- *Painter Training Certifications: Initial and Refresher Training Dates*
- *Spray booth filter efficiency documentation*
- *Spray gun transfer efficiency as approved by LDEQ, if not using HVLP gun, electrostatic application, airless spray gun, or air assisted spray gun.*
- *Documentation sufficient to verify annual MeCl usage and MeCl content information (such as MSDS)*
- *Written MeCl minimization plan if annual usage > 1 ton per year, as well as annual review/updates of your MeCl minimization plan*
- *Deviation and corrective action documentation*
- *Records of any compliance assessments performed by you in support of the required notifications (see previous slide)*

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Painter Certification:

- *All new and existing personnel, including contract personnel, who spray apply surface coatings must be certified. Refresher training required every five (5) years.*

Training Program must include:

- *List of all current personnel by name and job description who are required to be trained*
- *Hands-on and classroom instruction, including:*
 - *Spray gun equipment selection, set up and operation*
 - *Spray techniques for different types of coatings*
 - *Routine spray booth and filter maintenance*
 - *Environmental compliance with the requirements of 40 CFR 63 Subpart HHHHHH*
- *Description of the methods used to train personnel (what you will teach)*

****All personnel must be trained and certified no later than 180 days after hiring****

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Paint Stripping and Miscellaneous Surface Coating Operations

Applying for an Exemption:

- *LDEQ has developed a form that will soon be available on the LDEQ website.*

Petition for Exemption must include:

- *A description of the coatings that are spray applied*
- *Certification that you do not spray apply any coatings containing the target HAPs*
- *Other information as requested on the exemption form*

NOTE: If circumstances change such that you intend to spray apply coatings containing the target HAP, you must submit the initial notification (as required in the regulations) and comply with all requirements of this subpart.

Links and Info



EPA links – LOUISIANA is in REGION 6 www.epa.gov/region6



- Area source complete rules and information:
<http://www.epa.gov/ttn/atw/area/arearules.html#imp>
- Paint Stripping and Misc. Surface Coating Complete preamble and rule text: <http://www.epa.gov/ttn/atw/area/fr09ja08.pdf>
- Brief Instructional Video
<http://www.epa.gov/collisionrepair/training.html>

For more details and assistance, please talk to your EPA regional office contact – these web links are a good place to start:

- http://www.epa.gov/ttn/atw/area/regional_contacts.pdf
- <http://www.smallbiz-enviroweb.org/contacts.aspx>

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Resources

Louisiana Environmental Regulatory Code (LAC)

Title 33 :Part III.Air

<http://www.deq.louisiana.gov/portal/tabid/96/Default.aspx>

The Code of Federal Regulation (CFR)

NESHAP (40 CFR 63)

<http://www.gpoaccess.gov/cfr/retrieve.html>

The Clean Air Act (CAA)

The Clean Air Act Amendments (CAAA)

<http://www.epa.gov/air/caa/peg/>

Environmental Protection Agency

<http://www.epa.gov>

Definitions and Acronyms

- APD Air Permits Division
- BACT Best Achievable Control Technology
- BART Best Available Retrofit Technology
- BMP Best Management Practices (Plan)
- CAA Clean Air Act
- CAAA Clean Air Act Amendments
- CEMS Continuous Emission Monitoring System
- CFR Code of Federal Regulations
- CMS Continuous Monitoring System
- CO Carbon monoxide
- Criteria Pollutants These are nitrogen oxide (NO_x), sulfur dioxide (SO₂), Particulate Matter (PM), Carbon Monoxide (CO), Volatile Organic Compounds (VOC), and Lead (Pb).
- DEQ Department of Environmental Quality
- EPA Environmental Protection Agency
- EDMS Electronic Documents Management System : The repository for all official records created or received by the Department

Definitions and Acronyms

- HAP Hazardous Air Pollutant
- HON Hazardous Organic NESHAPS
- LAC Louisiana Administrative Code
- LAER Lowest Achievable Emission Rate
- Major Source Facilities with emissions of criteria emissions that equal or exceed 100 tons per year (TPY) or emissions of any one federally-regulated HAP that equals or exceeds 10 TPY or if total HAP emissions for the facility equal or exceed 25 TPY. Lower emission thresholds for a criteria pollutant may apply in nonattainment areas. A facility which has emissions of one or more criteria pollutants above 100 tpy.
- MACT Maximum Achievable Control Technology
- MER Minimum Emission Rate
- Minor Source Facilities with emissions of criteria emissions that are less than 100 tons per year (TPY) or emissions of any one federally-regulated HAP is less than 10 TPY or if total HAP emissions for the facility are less than 25 TPY.
- MM Million
- MMBTU Millions of British thermal units

Definitions and Acronyms



•NAA	Nonattainment area
•NAAQS	National Ambient Air Quality Standards
•PM2.5	Particulate Matter of 2.5 microns or less aerodynamic diameter
•PM-10	Particulate matter, 10 microns or less in size
•NESHAP	<u>N</u> ational <u>E</u> mission <u>S</u> tandards for <u>H</u> azardous <u>A</u> ir <u>P</u> ollutants
•NSPS	<u>N</u> ew <u>S</u> ource <u>P</u> erformance <u>S</u> tandards
•NSR	New Source Review
•NNSR	Non-attainment New Source Review
•Pb	Lead
•PPB	Parts per Billion
•PPM	Parts Per Million
•PSD	Prevention of Significant Deterioration
•PTE	Potential To Emit is the emissions from a facility if it is run at maximum all year long.
•SCF	Standard Cubic Foot
•SCFH	Standard Cubic Feet per Hour
•SCFM	Standard Cubic Feet per Minute

Definitions and Acronyms

- SCM Standard Cubic Meter
- SIC Standard Industrial Classification
- SIP State Implementation Plan
- SO₂ Sulfur dioxide
- SOCMI Synthetic Organic Chemical Manufacturing Industry
- SOP Standard Operating Procedures
- Synthetic minor source A facility that would be major source except that the emissions are being controlled below the major source emission level. The facility is permitted as a minor source.
- Title V Operating Permit Program authorized by Title V of the Clean Air Act
- TPY Tons per year
- VOC Volatile Organic Compound
- TEMPO Tools for Environmental Management and Protection Organizations.: The Department's official database into which all data for every facility is entered.

Office & Division Contact Information

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