

# Initial Notification/Notification of Compliance Status For Paint Stripping and Miscellaneous Surface Coating Operations

Area Source Rule

40 CFR Part 63, Subpart HHHHHH (Parts 63.11169-63.11180)

## INSTRUCTIONS

### 1. Who Must Complete This Form?

On January 9, 2008, the U.S. Environmental Protection Agency (U.S. EPA) promulgated federal regulations codified in 40 CFR Part 63, Subpart HHHHHH to reduce air emissions from the following area sources:

- Paint stripping using methylene chloride (MeCl)
- Surface coating of motor vehicles and mobile equipment
- Surface coating of miscellaneous metal and/or plastic parts

Specific operations are exempt from the regulation as described in Section 6 below. If the area source conducts any one of the operations listed above and does not meet the exemption criteria in Section 6, then this form must be completed and submitted to U.S. EPA at the address listed in Section 5.

Contact the Michigan Department of Environmental Quality's Environmental Assistance Program at (800) 662-9278 for help in completing this form.

### 2. Definitions

**Area source** – any stationary source of hazardous air pollutants (HAP) that is not a major source.

**Existing source** – an area source that was engaged in surface coating and/or paint stripping on or before September 17, 2007 or the source began the installation of the surface coating and/or paint stripping equipment on or before this date.

**Major Source** – any stationary source or group of stationary sources located within a contiguous area and under common control that emits, or has the potential to emit, considering controls, 10 tons per year (tpy) or more of any single hazardous air pollutant (HAP), or 25 tpy or more of any combination of HAPs.

**New Source** – an area source that was not engaged in surface coating and/or paint stripping on or before September 17, 2007 and began installation of the surface coating and/or paint stripping equipment after September 17, 2007.

**Paint stripping operations** – those operations that perform paint stripping using methylene chloride (MeCl) for the removal of dried paint (including but not limited to paint, enamel, varnish, shellac, and lacquer) from wood, metal, plastic, and other substrates at area sources, where paint stripping is either the principal activity, or an incidental activity at the source.

**Surface coating of miscellaneous metal and/or plastic parts** – those operations that involve spray application of coatings that contain the target HAP compounds of chromium, lead, manganese, nickel, or cadmium to miscellaneous parts and/or products made of metal or plastic, or combination of metal or plastic that are not motor vehicles or mobile equipment.

**Surface Coating of motor vehicles and mobile equipment** – those operations that involve spray application of coatings at area sources to automobiles, light trucks, heavy duty trucks, buses, construction equipment, self-propelled vehicles and equipment that may be drawn and/or driven on a roadway.

**Target Hazardous Air Pollutants (HAPs)** - compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

### 3. What Parts of the Form Must Be Completed?

You should complete all parts of the form: A.1 – A.7, B.1 – B.2, and C.1. Most auto body repair facilities should answer “yes” to the question in Part A.5 and “no” to the question in Part A.6. See definitions of surface coating on page 1.

### 4. When Must this Form Be Submitted?

Existing sources must submit the Initial Notification to U.S. EPA by no later January 11, 2010. If you are certifying that your source is in compliance with the relevant requirements of Subpart HHHHHH at the time of your Initial Notification submittal (i.e., you check box C.1 (a) on page 3 of the form), then this Initial Notification also serves as your Notification of Compliance Status. If you check box C.1 (b) on page 3, then you have until March 11, 2011 to submit a separate Notification of Compliance Status to U.S. EPA certifying your compliance with Subpart HHHHHH.

New sources must certify in the Initial Notification whether the source is in compliance with all relevant requirements of Subpart HHHHHH. The Initial Notification and Notification of Compliance Status must be submitted within 180 days after startup or by July 7, 2008, whichever is later. New sources that are in full compliance with the relevant requirements of Subpart HHHHHH would check box C.1 (a). If your new source is not in compliance with Subpart HHHHHH upon submittal of the Initial Notification, you would check box C.1 (c) and explain what your noncompliance issues are and what you are doing to achieve compliance. Once your new source’s compliance status has changed to compliant, then you would submit an Annual Notification of Changes Report to U.S. EPA. Contact the Environmental Assistance Program at (800) 662-9278 for more information.

### 5. Where Do I Send The Completed Form?

Please make a copy of this form and submit the original signed copy by U.S. mail, or by another courier, to the U.S. EPA, Region 5 Office at the following address:

U.S. EPA, Region 5  
Compliance Tracker (AE-17J)  
77 West Jackson Blvd.  
Chicago, IL 60604

### 6. Who is Exempt from the Regulation?

The regulations do not apply to the following activities:

1. Surface coating or paint stripping performed on site at installations owned or operated by the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State), the National Aeronautics and Space Administration, or the National Nuclear Security Administration.
2. Surface coating or paint stripping of military munitions, as defined in §63.11180, manufactured by or for the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State) or equipment directly and exclusively used for the purposes of transporting military munitions.
3. Surface coating or paint stripping performed by individuals on their personal vehicles, possessions, or property, either as a hobby or for maintenance of their personal vehicles, possessions, or property. This subpart also does not apply when these operations are performed by individuals for others without compensation. However, an individual who spray applies surface coating to more than two motor vehicles or pieces of mobile equipment per year is subject to the regulation pertaining to motor vehicles and mobile equipment regardless of whether compensation is received.
4. Surface coating or paint stripping that meets the definition of “research and laboratory activities” in §63.11180.
5. Surface coating or paint stripping that meets the definition of “quality control activities” in §63.11180.

6. Surface coating or paint stripping activities that are covered under another area source National Emission Standard for Hazardous Air Pollutants (NESHAP) regulation.
7. An owner or operator of a miscellaneous metal and/or plastic parts surface coating operation that do not use paint strippers containing methylene chloride and do not use coatings containing a target hazardous air pollutant (HAP) (see definition in Section 2).
8. An owner or operator of motor vehicle or mobile equipment surface coating operation that do not use paint strippers containing methylene chloride, and do not use coatings containing a target hazardous air pollutant (HAP) and have received an approval from U.S. EPA for their Petition for Exemption.



## Initial Notification/Notification of Compliance Status For Paint Stripping and Miscellaneous Surface Coating Operations

Area Source Rule

40 CFR Part 63, Subpart HHHHHH (Parts 63.11169-63.11180)

Please review the Instruction Sheet before completing this form. Please print or type all information.

### PART A – Facility Information

#### A.1 Company Information

Company Name:	Telephone Number:	
Mailing Address:	Fax Number:	
City:	State:	Zip:

Please check whether the area source is a new or existing source:  New Source  Existing Source  
(Refer to Instruction Sheet definitions)

#### A.2 Owner/Operator Information

Name:	Telephone Number:	
Mailing Address:	Email:	
City:	State:	Zip:

Please check whether the person listed above is the owner or operator of the area source:  Owner  Operator

#### A.3 Facility Location Information (If different from Company Information)

Company Name:	County:
Street Address:	State:
City:	Zip:

Is the source a motor vehicle or mobile equipment surface coating operation that repairs vehicles at the customer's location, rather than at a fixed location?  Yes  No

#### A.4 Identification of Regulatory Standard

I understand that I am subject to 40 CFR Part 63 Subpart HHHHHH, National Emissions Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources.

Please initial here \_\_\_\_\_

A.5 Surface Coating	Enter number of each		
	Spray booths	Prep stations	Painters
<input type="checkbox"/> Yes <input type="checkbox"/> No         Do you surface coat motor vehicles or mobile equipment?			

A.6 Surface Coating	Enter number of each		
	Spray booths	Prep stations	Painters
<input type="checkbox"/> Yes <input type="checkbox"/> No         Do you surface coat plastic and/or metal parts with paints containing cadmium, chromium, lead, manganese, and nickel?			

A.7 Paint Stripping Operations	
<input type="checkbox"/> Yes <input type="checkbox"/> No         Do you use paint strippers containing Methylene Chloride (MeCL)? Go to Part B if you answer "No."	
Methods of paint stripping employed (check all that apply) <input type="checkbox"/> Chemical <input type="checkbox"/> Mechanical <input type="checkbox"/> Other (please describe):	
Substrates stripped (check all that apply) <input type="checkbox"/> Wood <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Other (please describe)	
<input type="checkbox"/> Yes <input type="checkbox"/> No         Do you/will you use more than 1 ton of MeCL annually?	

## PART B – Relevant Requirements

### B.1 Requirements for Methylene Chloride (MeCL) Paint Stripping

Do you use paint strippers containing MeCL?  Yes  No

The relevant requirements are listed below:

- 1 Evaluate each application to ensure there is a need for paint stripping. [§63.11173(a)(1)]
- 2 Evaluate each MeCL paint stripping operation to ensure there is no alternative technology that can be used. [§63.11173(a)(2)]
- 3 Reduce exposure of paint strippers containing MeCL to the air. [§63.11173(a)(3)]
- 4 Optimize applications conditions to reduce evaporation. [§63.11173(a)(4)]
- 5 Practice proper storage and disposal of paint strippers. [§63.11173(a)(5)]

If you use more than 1 ton of MeCL annually, you must do the following:

- 1 Implement the requirements above. [§63.11173(b)]
- 2 Maintain copies of annual usage of paint strippers containing MeCL on site at all times. [§63.11173(c)]
- 3 Develop and implement a written MeCL minimization plan, which must be kept on site. [§63.11173(b) and (d)]
- 4 Post a placard or sign outlining the MeCL minimization plan in each area where the paint stripping occurs. [§63.11175(b)]

## B.2 Requirements for Surface Coating

Are you subject to the surface coating provisions of 40 CFR Part 63, Subpart HHHHHH?  Yes  No

The relevant requirements are listed below:

- 6 Spray-applied coatings are to be applied in a preparation station or spray booth and meet the requirements found in §63.11173(e)(2).
- 7 All spray applied coatings are to be applied with high volume, low pressure (HVLP) electrostatic, air-assisted airless application or equivalent technology. [§63.11173(e)(3)]
- 8 Train and certify all spray equipment operators in proper application of surface coatings. [§63.11173(e)(1)]

### Compliance Dates for Surface Coating and Paint Stripping Requirements

Source Type	Compliance Date
New Source (startup after 1/9/08)	Date of Startup
New Source (startup after 9/17/07, but on or before 1/9/08)	1/9/08
Existing Source (startup on or before 9/17/07)	1/10/11

## Part C – Compliance Certification

### C.1 Compliance Certification Statement

I certify the truth and accuracy and completeness of this notification and (*Please check one of the following three statements*):

- (a)  The source is operating in compliance with all of the applicable requirements of Subpart HHHHHH.
- (b)  The source is an existing source and will be in compliance with the relevant requirements by January 10, 2011.
- (c)  The source is a new source and is not operating in compliance with Subpart HHHHHH. The following is an explanation of the noncompliance and details of the correction actions being taken to achieve compliance.

---

---

---

Certifying Official:  Owner  Operator (check one)

---

Name of Certifying Official (print or type)

Title

Please make a copy of this Initial Notification and Notification of Compliance Status form and submit the original signed copy by U.S. mail, or by another courier, to the U.S. Environmental Protection Agency (U.S. EPA), Region 5 office at the following address:

U.S. EPA Region 5,  
Compliance Tracker (AE-17J)  
77 West Jackson Blvd.  
Chicago, IL 60604