



EASTERN KERN AIR POLLUTION CONTROL DISTRICT

2700 "M" STREET SUITE 302, BAKERSFIELD, CA 93301-2370

PHONE: (661) 862-5250 • FAX: (661) 862-5251 • www.kernair.org

INFORMATION FOR INITIAL NOTIFICATION Paint Stripping and Miscellaneous Surface Coating Operations

Area Source Rule 40 CFR Part 63 Subpart HHHHHH (Parts 63.11169 – 63.11180 and Table 1)

This cover sheet provides information for paint stripping and miscellaneous surface coating operations that will be subject to Area Source Rule 40 CFR Part 63 Subpart HHHHHH

Applicability and Initial Notification Requirements (Part I of the Form)?

You are subject to the requirements of 40 CFR Part 63 Subpart HHHHHH, if you operate an area source of Hazardous Air Pollutant (HAP) that performs one or more of the following activities:

- Paint stripping operations that involve the use of chemical strippers containing Methylene Chloride (MeCl), Chemical Abstract Service number 75092, in the paint removal process;
- Auto body refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations;
- Spray application of coatings to a plastic or metal substrate where the coatings contain compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd) collectively referred to as the target HAP.

An area source HAP is: A source of HAP that is not considered a major source of HAP, is not located at a major source, or is not part of a major source of HAP emissions. A major source of HAP emissions is 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 any single HAP at a rate of (10 tons or more per year), or emit any combination of HAP at a rate of (25 tons or more per year).

Exemptions (Part II of the Form)?

Owner or operator of a motor vehicle or mobile equipment surface coating operation may petition the Administrator for an exemption from the surface coating subpart if you can demonstrate, to the satisfaction of the Administrator, that you spray apply no coatings that contain compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd). If you qualify for this exemption you must complete Part II (Petition for Exemption) of this form and submit it with Part I (Initial Notification).

If you are subject to the rule and do not obtain exemption, then you are required to satisfy the rule requirements

This rule does not apply to:

- Surface coating or paint stripping performed on site at installations owned or operated by the Armed Forces of the United States.
- Surface coating or paint stripping of military munitions or equipment directly and exclusively used for the purposes of transporting military 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 per year.
- Surface coating or paint stripping that meets the definition of "research and laboratory activities."
- Surface coating or paint stripping that meets the definition of "quality control activities."
- Surface coating or paint stripping activities that are covered under another area source NESHAP.

Please submit the Initial Notification or Petition for Exemption to:

Eastern Kern Air Pollution Control District, 2700 "M" Street, Suite 302, Bakersfield, California 93301



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PART I

INITIAL NOTIFICATION

Paint Stripping and Miscellaneous Surface Coating Operations

Area Source Rule 40 CFR Part 63 Subpart HHHHHH (Parts 63.11169 – 63.11180 and Table 1)

This example format may be used to meet the Initial Notification requirements of Subpart HHHHHH; however, you are not required to use this format as long as you provide the information required by 40 CFR Section 63.11175(a).

1. Owner Information

Business Name:			
Owner's Name:		Title:	
Mailing Address:		E-mail Address:	
City:	State:	Zip:	Phone No:
Is the Owner the Operator? Yes No If "No" complete Section 2 (attach a list of operators if more than one)			

2. Operator Information

Operator's Name:		Title:	
Mailing Address:		E-mail Address:	
City:	State:	Zip:	Phone No:
Is there any other Certifying Official that will sign this form? Yes No If "Yes" complete Section 3			

3. Certifying Official Information

Certifying Official's Name:		Title:	
Mailing Address:		E-mail Address:	
City:	State:	Zip:	Phone No:

4. Location of Affected Source

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 If "No" provide source address below			
Address	City:	State:	Zip:
Are the compliance records located at the same location? Yes No If "No" provide location of records below			
Address:	City:	State:	Zip:

5. Identification of Standard (you must check this box)

Yes, I am subject to 40 CFR Part 63 Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Source; Final Rule.
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6. Surface Coating Operations (check all that apply)

Type of Operation	Number of Spray Booths	Number of Prep Stations	Number of Painters
Motor Vehicle or Mobile Equipment Surface Coating Operation			
Miscellaneous Surface Coating Operation			

7. Paint Stripping Operations (check all that apply)

Methods of paint stripping employed:	Chemical	Mechanical	Other (describe):	
Substrates stripped:	Wood	Plastic	Metal	Other (describe):
Do you plan to use more than 1 ton of Methylene Chloride (MeCl) annually?	Yes	No		

8. Compliance Status (check one)

For paint stripping operations, the relevant requirements that you must evaluate in making this determination are specified in 40 CFR 63.11173(a) through (d) of this subpart. For surface coating operations, the relevant requirements are specified in 40 CFR 63.11173(e) through (g) of this subpart.

I am already in compliance with each of the relevant requirements.

I will be in compliance with each of the relevant requirements by the compliance date.

New Source (after Jan 9, 2008) Compliance date is date of startup.
 New Source (after September 17, 2007 but before January 9, 2008) Compliance date is January 9, 2008.
 Existing source (before September 17, 2007) Compliance date is January 10, 2011.
 Note: Initial startup is the first time equipment is brought online in a paint stripping or surface coating operation, and paint stripping or surface coating is first performed.

9. Certification of compliance status (check one)

New Source (startup after 9/17/2007)
 If your source is a new source, a responsible official, whose information is provided above, must certify by signing below that the source is in compliance with each of the relevant requirements of this subpart.

I am a new source (Initial startup was on or after January 9, 2008) Date:

I am a new source (Initial startup was after September 17, 2007 but before January 9, 2008) Date:

Existing Source (startup before 9/17/2007)
 If your source is an existing source, a responsible official, whose information is provided above, may certify below that the source is already in compliance with each of the relevant requirements of this subpart or certification may be done by March 11, 2011 in the Notification of Compliance Status as specified in 40 CFR Section 63.11175(b).

I am an existing source (Initial startup was before September 17, 2007) Date:

I am certifying below

I will certify by March 11, 2011 (Not required to sign below but you must sign a statement by March 11, 2011).

I certify the truth, accuracy, and completeness of this notification. The source has complied with all the relevant standards of this subpart. This initial notification also serves as the notification of compliance status.

Print Name of Certifying Official: _____ **Owner** _____ **Operator** _____

Signature of Certifying Official: _____ **Date:** _____

PART II
PETITION FOR EXEMPTION
Motor Vehicle and Mobile Equipment Surface Coating Operations

Area Source Rule 40 CFR Part 63 Subpart HHHHHH (Parts 63.11169 – 63.11180 and Table 1)

An exemption from the requirements of Subpart HHHHHH is case/fact specific. This Petition for Exemption is to illustrate the type of information that you might submit to request an exemption. You may use your own form as long as you include all the information required by the rule for a petition. If approved, we will respond to your petition after we have evaluated the information you provided.

In accordance with 40 CFR §63.11170(a)(2), an owner or operator of a motor vehicle or mobile equipment surface coating operation (including refinishing operations) may petition the United States Environmental Protection Agency (EPA) Administrator to exempt the operation from the surface coating regulatory requirements of 40 CFR Part 63 Subpart HHHHHH, if the owner or operator can demonstrate that the spray-applied coatings used by the facility do not contain target hazardous air pollutants (HAP) (paint stripping requirements still apply).

Note: in determining whether you spray apply target HAP containing coatings, do not include coatings applied using hand-held aerosol cans, or hand-held devices (e.g., spray guns) with a paint cup capacity of 3 fluid ounces or less. These are not considered spray-applied coatings under the rule. See, “spray-applied coating operations” definition at 40 CFR §63.11180.

As defined in 40 CFR §63.11180, coatings are “target HAP containing coatings” if they contain compounds of chromium (Cr), lead (Pb), nickel (Ni), cadmium (Cd), or manganese (Mn) above a given concentration. If a compound is not carcinogenic, then the rule allows a higher concentration of the compound before the coating is considered to be a target HAP containing coating, as described here:

- Coatings containing compounds of chromium (e.g., chromates) including hexavalent chromium (Cr⁺⁶) or trivalent chromium (Cr⁺³), lead (Pb), nickel (Ni), cadmium (Cd), or manganese (Mn) that are carcinogens and are present at more than 0.1% of the coating by mass are target HAP containing coatings.
- Coatings containing compounds of trivalent chromium (Cr⁺³) or manganese (Mn) that are not carcinogens, and are present at more than 1.0% of the coating by mass are also target HAP containing coatings.
- Refer to the coating Material Safety Data Sheets (MSDS) or obtain documentation from your supplier for each coating that you spray apply without mixing. If you mix coatings prior to application, determine the target HAP concentration for each coating mixture that you spray apply.

1. Reason(s) for Exemption

Business Name:
Describe your surface coating operation and explain why your facility qualifies for the exemption under 40 CFR §63.11170 (a)(2). For example: Our facility repairs automobile collision damage. We are seeking an exemption because we do not use any target HAP containing coatings.

2. Description of Spray-Applied Coatings

Identify the manufacturer(s) and product line(s) of all the spray-applied coatings used at this facility. Attach additional pages to this petition, if necessary.

Manufacturer	Product Line

3. Certification Statement

I have consulted reliable analyses (material safety data sheets or information obtained from the coating manufacturer) of the coatings that are used in this facility and have determined that we do not spray apply target HAP containing coatings as defined in 40 CFR §63.11180. Furthermore, I have verified that none of the coatings mixed prior to application contain target HAP as spray-applied, based on the definition of “target HAP containing coatings”. I certify, under penalty of law, to the truth, accuracy, and completeness of the information provided in this petition. If circumstances change such that we intend to spray apply target HAP containing coatings in surface coating operations, we will submit the initial notification required by 40 CFR §63.11175 and will comply with the requirements of 40 CFR Part 63 Subpart HHHHHH (the National Emission Standard for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources). Spray application of target HAP containing coatings in a surface coating operation voids any exemption that might be granted as a result of this petition.

If your petition is approved, then you must keep a copy of the approval on site at your facility until you change your operation(s) to include spray application of target HAP containing coatings, or discontinue motor vehicle and mobile equipment surface coating operations.

Certifying Official must be the owner or operator of the facility (check all that apply)

Print Name of Certifying Official:	Owner	Operator
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Signature of Certifying Official:	Date:
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4. Submit Initial Notification with Petition for Exemption to:

If your facility is located in the Eastern Kern Air Pollution Control District jurisdiction, send this form to:

EKAPCD
 2700 “M” Street, Suite 302
 Bakersfield, California 93301

If your facility is located in another Air District, send this form to the appropriate Air District.