What Is The Compliance Date?

- Existing Sources: January 10, 2011.
- An affected source is a new source if you commenced construction of the source after September 17, 2007 by installing new paint stripping or surface coating equipment at a source not actively engaged in paint stripping and/or miscellaneous surface coating prior to September 17, 2007.
- An affected source is an existing source if it is not a new source or a reconstructed source (An affected source is reconstructed if it meets the definition of reconstruction in §63.2.).

What are the Permitting Requirements?

- Affected facilities are exempt from Title V permit requirements provided they are not required to obtain a permit for another reason.

What Reporting/Recordkeeping is Required?

Reporting:

- Initial Notification (informs EPA that the facility is subject to the standards and when the source will be in compliance).
  - New Sources: July 7, 2008 or 180 days after startup
  - Existing Sources: January 11, 2010
- Notification of Compliance (certifies that the source is in compliance with the applicable requirements).
  - New Sources: As part of the Initial Notification
  - Existing Sources: March 11, 2011
- Annual notification of changes report—required each calendar year any reportable changes occur.

Recordkeeping (keep these records on file)

- Records to include copies of Notifications submitted to EPA.
- Painter training certifications.
- Spray booth filter efficiency documentation.
- Spray gun transfer efficiency.
- MeCl content information such as MSDS.
- Annual usage of MeCl for paint stripping, and written MeCl minimization plan if annual usage > 1 ton per year.
- Deviation and corrective action documentation.

Records to be maintained in a form suitable and readily available for expeditious review.

You can also contact your Regional EPA air toxics office at the following numbers:

<table>
<thead>
<tr>
<th>Region</th>
<th>Address</th>
<th>States</th>
<th>Telephone</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>1 Congress Street Suite 1100 Boston, MA 02114-2023</td>
<td>RI, VT</td>
<td>(617) 918-1650</td>
</tr>
<tr>
<td>2</td>
<td>290 Broadway New York, NY 10007-1866</td>
<td>NJ, NY, PR, VI</td>
<td>(212) 637-4033</td>
</tr>
<tr>
<td>3</td>
<td>1650 Arch Street Philadelphia, PA 19103-2029</td>
<td>DE, MD, PA, VA, WV, DC</td>
<td>(800) 241-1754</td>
</tr>
<tr>
<td>4</td>
<td>Atlanta Federal Center 61 Forsyth Street, SW Atlanta, GA 30303-8980</td>
<td>FL, NC, SC, KY, TN, GA, AL, MS</td>
<td>(404) 562-9131</td>
</tr>
<tr>
<td>5</td>
<td>77 West Jackson Blvd, Chicago, IL 60604-3507</td>
<td>IL, IN, MI, WI, MN, OH</td>
<td>(312) 335-3575</td>
</tr>
<tr>
<td>6</td>
<td>1445 Ross Avenue Suite 1200 Dallas, TX 75202-2733</td>
<td>AR, LA, NM, OK, TX</td>
<td>(303) 866-5717</td>
</tr>
<tr>
<td>7</td>
<td>901 North Fifth Street Kansas City, KS 68101</td>
<td>IA, KS, MO, NE</td>
<td>(800) 223-0425</td>
</tr>
<tr>
<td>8</td>
<td>1595 Wyckroft St Denver, CO 80202-4129</td>
<td>CO, MT, NM, SD, UT, WY</td>
<td>(800) 223-0425</td>
</tr>
<tr>
<td>9</td>
<td>75 Haworth Street San Francisco, CA 94105</td>
<td>CA, AZ, HI, NV, GLI, AS, MS</td>
<td>(415) 744-1197</td>
</tr>
<tr>
<td>10</td>
<td>1200 6th Ave. Suite 900, AWT-107 Seattle, WA 98101</td>
<td>AK, ID, WA, OR</td>
<td>(206) 555-2220</td>
</tr>
</tbody>
</table>

*For sources within the region only.

For More Information
Copies of the rule and other materials are located at:
http://www.epa.gov/ttn/atw/area/arearules.html

For more information on state requirements, please contact your state representative found at the following link:
http://www.4cleanair.org/contactUsaLevel.asp
PAINT STRIPPING AND MISCELLANEOUS SURFACE COATING OPERATIONS (SUBPART HHHHHH)

What Is an Area Source?

- Any source that is not a major source. (A major 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 individual hazardous air pollutants (HAP) or 25 TPY of combined HAP.)

Who Does This Rule Apply To?

- Area sources that engage in any of the following:
  - Paint stripping operations that use methylene chloride (MeCl)-containing paint stripping formulations;
  - Spray application of coatings to motor vehicles and mobile equipment;
  - Spray application of coatings to a plastic and/or metal substrate where the coatings contain any target HAP.

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."

What Am I Required To Do?

- Paint Stripping Operations—implement management practices that minimize emissions of MeCl.
  - Evaluate the need for paint stripping (e.g., is it possible to re-coat without stripping?).
  - Evaluate each application—potential alternatives
  - Reduce exposure of strippers to air
  - Optimize application conditions
  - Practice proper storage and disposal.
- For each paint stripping operation with > 1 ton MeCl annual usage, develop and implement a written MeCl minimization plan.
- Maintain copies of annual usage of paint strippers containing MeCl.
- Motor Vehicle/Mobile Equipment/Miscellaneous Surface Coating Operations.
  - Train/certify all painters on spray gun equipment selection, spray techniques, maintenance, and environmental compliance (consult rule for complete list).
  - Install/operate filter technology on all spray booths/stations/enclosures to achieve at least 98% capture efficiency.
  - Spray booths/stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed and ventilated at negative pressure.

What Are The Impacts?

- Most paint stripping facilities already comply with the rule requirements. Estimate 1,000 facilities will need to take action to comply.
  - Reduce 1,000 tons MeCl annually,
  - Capital costs = $1.5 million.
  - Annual benefit = $0.9 million.
- Most surface coating facilities already comply with the rule requirements. Estimate < 25% of existing facilities will need to take some action to comply.
  - Reduce 6,900 tons of HAP annually including 11 tons of metal HAP.
  - Capital costs = $20 million; however, initial cost to be off-set and recovered over time by cost savings as a result of more efficient use of labor and materials.