

National Emission Standards for Hazardous Air Pollutants (NESHAP)

Aneka Swanson

Small Business Environmental Assistance
Program

651-282-6143

www.pca.state.mn.us/programs/sbap_p.html



**Minnesota Pollution
Control Agency**

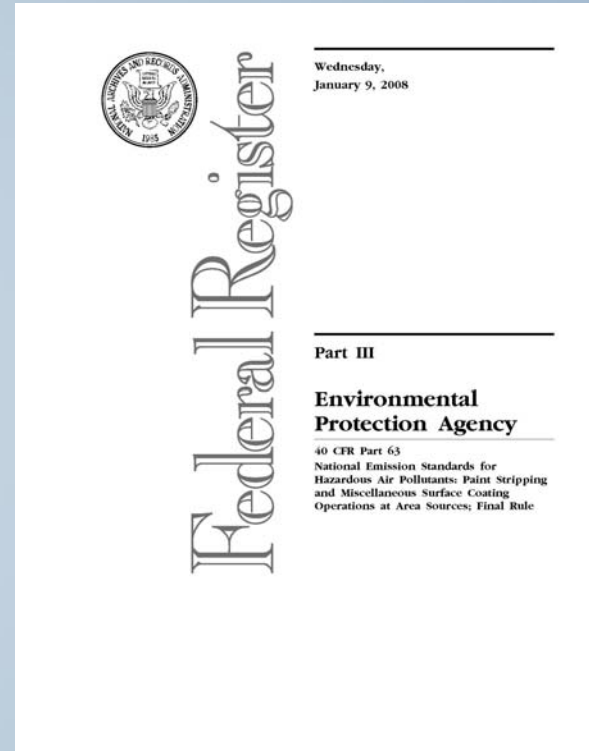
Small Business Environmental Assistance Program

- Part of the Minnesota Pollution Control Agency (MPCA)
 - free
 - confidential
 - multi-media
 - Air, wastewater, stormwater, hazardous waste, pollution prevention



Overview

- What is a NESHAP?
- NESHAP Subpart 6H: Paint Stripping and Miscellaneous Surface Coating Operations
 - Who is affected by this regulation?
 - What are the requirements?
 - Equipment, training, notification, recordkeeping
 - Exemptions



What is a NESHAP?

- National Emission Standard for Hazardous Air Pollutants
 - **National** – Federal Clean Air Act requirement, EPA-enforced
 - **Emissions** – Clean Air Act = air emissions
 - **Standard** – everyone follows the same rules
 - **Hazardous Air Pollutants** (HAPs) – Clean Air Act list of toxic air pollutants
 - Known or suspected to cause cancer or other serious health effects
 - Includes volatiles and metals
 - Purpose of NESHAP is to minimize the release HAPs

What is a NESHAP?

- Additional requirement beyond air permit
 - May need both, or only one, or neither
 - Applicability is based on activities at the facility (not total emissions like a permit)
 - Examples: Boilers, Spray painting, Dry cleaning
- “Generally Achievable” management methods
 - Likely to have many of these already in place
- Many different NESHAPs; one is likely to apply

NESHAP Subpart 6H: Paint Stripping and Misc Surface Coating Operations

- Issued January 2008
- **Existing** sources
 - Initial notification submitted to EPA by January 2010
 - Compliance notification submitted by March 2011
 - This means you must be in compliance by then!
 - Forms available on MPCA website
- **New** sources have 180 days after startup to submit initial and compliance notifications.
- Submit a report with changes as needed

NESHAP Subpart 6H: Paint Stripping and Misc Surface Coating Operations

- Regulates three activities
 1. Paint stripping operations that use methylene chloride
 2. Spray application of coatings to motor vehicles
 3. Spray application of coatings to plastic or metal parts and products

NESHAP Subpart 6H: Paint Stripping and Misc Surface Coating Operations

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NESHAP Subpart 6H: Paint stripping operations that use methylene chloride

- Stripping wood, metal, plastic, or other substrates
- Rule seeks to minimize methylene chloride evaporation
- Requirements
 - For each piece, consider:
 - Is stripping necessary?
 - Use alternative methods/chemicals where possible
 - Limit exposure of paint strippers containing methylene chloride to the air.
 - Optimize application conditions to reduce evaporation (i.e. if heated, keep heat as low as possible).
 - Practice proper storage and disposal of paint strippers.

NESHAP Subpart 6H: Paint stripping operations that use methylene chloride

- Requirements
 - Maintain records of methylene chloride use
 - If using more than 1 ton of methylene chloride annually, develop and implement a methylene chloride minimization plan; review and update plan annually
- If not using methylene chloride for paint stripping, rule does not apply, no further action required

NESHAP Subpart 6H: Paint Stripping and Misc Surface Coating Operations

- Regulates three activities
 1. Paint stripping operations that use methylene chloride
 2. Spray application of coatings to motor vehicles
 3. Spray application of coatings to plastic or metal parts and products
- Rule applies to spray application of coatings using a hand-held device.

NESHAP Subpart 6H: Spray application of coatings to motor vehicles or non-automotive plastic or metal products

- Rule seeks to minimize the release of five HAPs metals
 - Cadmium
 - Chromium
 - Lead
 - Manganese
 - Nickel

NESHAP Subpart 6H: Spray application of coatings to motor vehicles or non-automotive plastic or metal products

- Requirements – Equipment
 - HVLP spray gun (or equivalent transfer efficiency)
 - Gun cleaned using non-atomizing method (enclosed gun cleaner or disassembled and cleaned by hand)



NESHAP Subpart 6H: Spray application of coatings to motor vehicles or non-automotive plastic or metal products

- Requirements – Equipment
 - Must use spray booth or prep station
 - Roof and three or four complete wall/curtains
 - 4 = Booth large enough to hold a vehicle
 - 3 = Prep station or smaller booth
 - Ventilate booth/prep station at negative pressure, ensuring that air is drawn in to any openings
 - Filters must be at least 98% efficient, or use waterwash booth

NESHAP Subpart 6H: Spray application of coatings to motor vehicles or non-automotive plastic or metal products

- Requirements – Training
 - Either in-house or off-site
 - Both classroom and hands-on required
 - Within 180 days of hire or by Jan 10, 2011
 - Valid for five years

NESHAP Subpart 6H: Spray application of coatings to motor vehicles or non-automotive plastic or metal products

- Requirements – Training
 - Techniques to minimize overspray and emissions
 - Spray gun equipment selection, set up, and operation
 - Spray techniques for different types of coatings
 - Booth and filter maintenance
 - Filter selection and installation
 - Discussion of the requirements of this NESHAP


NESHAP Subpart 6H: Spray application of coatings to motor vehicles or non-automotive plastic or metal products

- Requirements – Recordkeeping
 - Documentation of painter training
 - Names and job descriptions of painters trained
 - Dates of initial and refresher trainings
 - Contents of training
 - Paint booth filter efficiency
 - If gun is not HVLP, documentation from manufacturer that it has equivalent transfer efficiency
 - Copies of notifications and any annual reports submitted
 - Records of deviations, including date, extent, description, and corrective action
 - Records of any assessments performed to determine compliance

NESHAP Subpart 6H: Spray application of coatings to motor vehicles or non-automotive plastic or metal products

■ Exemptions

- If spray coating non-automotive products and paints don't contain Cd, Cr, Pb, Ni, Mn, rule is not applicable – no further action required
- If spray coating motor vehicles, and paints don't contain Cd, Cr, Pb, Ni, Mn, **must petition for exemption**

 Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, MN 55155-4194

Motor Vehicle and Mobile Equipment Surface Coating Petition Checklist
National Emission Standards for Hazardous Air Pollutants (NESHAP)
40 CFR 63 Subpart HHHHHH

If you are a motor vehicle and mobile equipment surface coating facility and do not use any coatings that contain targeted Hazardous Air Pollutants (HAP), you can use this checklist to prepare your petition to the EPA Administrator for exemption from the rule. However, even if only one of your coatings contains target HAPs, you must comply with the rule. The target HAPs are: chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

If at any time you begin to spray apply coatings that meet the definition of a target HAP-containing coating, you must submit the initial notification required by 40 CFR 63.11175 and comply with the requirements of 40 CFR 63 Subpart HHHHHH.

A. Review the MSDS for each coating and additive that you use at your facility. If any coating has more than or exactly 1.0 percent by mass of a compound containing one of the above elements, it is a target HAP-containing coating and you must comply with the rule.

1. If any coating has less than 1.0 percent by mass of a compound containing one of the above elements, you will need to review the list of COSHA-defined carcinogens. If the compound is on the list and is present at more than 0.1 percent by mass, it is a target HAP-containing coating and you must comply with the rule.
2. Review these two sources to determine if the compound is a carcinogen
 - a. National Toxicology Program at: <http://ntp.niehs.nih.gov/>
click on: "Report on Carcinogens" in the Public Health Section
 - b. International Agency for Research on Cancer Monographs at: <http://monographs.iarc.fr/>
click on "List of Classifications"

B. Include the following in your submittal petition:

- Written description of the coatings (and additives) that you spray-apply, including the specific percentage of each chemical contained in the coating. Example: White Valpar base coat, 3 percent chemical X, 15 percent chemical Y, 62 percent chemical Z
- Written certification statement verifying that you do not spray apply any coatings that meet the definition of a target HAP-containing coating. The certification must be signed by an authorized individual from your facility.
- It is also recommended, though not required, that you submit the MSDSs for the coatings and additives you use.

Please make two (2) copies of the petition. Keep one for your records.

Mail the original petition to the United States Environmental Protection Agency, Region 5 Office at the following address:
EPA Region V
Air and Radiation Division
77 West Jackson Boulevard (A19-J)
Chicago IL 60604-3507

Please mail the remaining copy of the petition to the Minnesota Pollution Control Agency at the following address:
Minnesota Pollution Control Agency
Attn.: Compliance Tracking Coordinator – Fourth floor
Data Analysis Unit, Data Services Section
520 Lafayette Road North
St Paul MN 55155-4194

www.pca.state.mn.us • 651-296-6200 • 800-657-3864 • TTY 651-282-5332 or 800-657-3864 • Available in alternative formats
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NESHAP Subpart 6H: Paint Stripping and Misc Surface Coating Operations

- Exemptions – Activities
 - Quality control activities
 - Facility maintenance
 - Activities covered under other NESHAPs
 - Hobby = two or fewer cars per year
- Exemptions – “not coatings”
 - Adhesives, sealants, maskants, or caulking materials
 - Temporary protective coatings, lubricants, or surface preparation materials

NESHAP Subpart 6H: Paint Stripping and Misc Surface Coating Operations

■ Exemptions – Materials

- Airbrush (<3 fl oz paint cup)
- Aerosol spray cans
- Powder coating
- Non-atomizing means: paint brushes, rollers, hand wiping, flow coating, dip coating, electrodeposition, web coating, coil coating, touch-up markers, or marking pens

NESHAP Subpart 6H: Paint Stripping and Misc Surface Coating Operations

- Continued outreach over the next two years
- Get started now, plan, make changes if needed
- Call the Small Business Environmental Assistance Program if you have questions

Contact info:
Aneka Swanson
Small Business Environmental Assistance
Program

Minnesota Pollution Control Agency

Hotline: 651-282-6143

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