

Compliance Headliner

National Emission Standards for Hazardous Air Pollutants (NESHAP)

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The U.S. Environmental Protection Agency (EPA) has established new standards for controlling hazardous air pollutants (HAP) from paint stripping and surface coating of motor vehicles and vehicle parts and sub assemblies. The standards are designed to reduce emissions of methylene chloride (MeCl) used in paint stripping operation and the HAP compounds of chromium (Cr), lead (Pb), Manganese (Mn), Nickel (Ni), and cadmium (Cd) from motor vehicle surface coating operations.

Surface Coating Operations

Many of the coating pigments used in automotive refinishing operations contain HAP. The EPA believes that the cumulative effect of HAP emissions from the automotive refinishing industry poses a threat to public health and the environment, so they have established a standard that mandates the following requirements:

- Apply coatings with high volume low pressure (HVLP) spray guns, electrostatic spray guns, airless or air-assisted airless spray gun or a gun demonstrated to be equal in transfer efficiency to an HVLP spray gun.
- All spray applied coatings must be applied in a spray booth or a preparation station. Spray booths used to refinish complete vehicles must be large enough to hold the entire vehicle and have a complete roof and four side walls or curtains. The booth must be ventilated at negative pressure so that air is drawn into any openings in the booth. The booth can have up to 0.05 inches water positive pressure if it is fully enclosed with seals on the doors and other openings and an automatic pressure balancing system. Booths for coating parts and subassemblies must have a full roof, at least three side walls or curtains, and must be ventilated so that air is drawn into the booth.
- Spray booths must be fitted with filters demonstrated to achieve at least a 98% capture efficiency of overspray.
- All painters must receive training in spray gun equipment selection, set-up, and operations; techniques to improve transfer efficiency and minimize paint usage and over spray; routine spray both and filter maintenance; proper storage and disposal of waste.

Coating operations that were constructed after September 17, 2007 are required to submit a notification to the EPA or the designated state agency within 180 days of start of operation or July 7, 2008, whichever is later. Existing sources (constructed before September 17, 2007) must submit their notifications no later than January 10, 2010. The notifications must include a description of the coating operations and a statement on the status of their compliance. Existing sources must comply with all of the requirements by January 10, 2011 and submit a "Notification of Compliance" by March 11, 2011.

The standard requires facilities to maintain records to demonstrate that they are operating in compliance with the new requirements. The records must be kept for at least five years from the date of the record. Copies of the records must be maintained on site in a printed or electronic form that is readily accessible for inspection for at least two years and then can be kept at an off-site location for the next three years. The following are the required records:

- Certification that each painter has completed the required training
- Documentation of filter efficiency of spray booth filters.
- Documentation from spray gun manufacturers that the guns comply with the requirements.
- Copies of notifications submitted to the EPA and/or designated state agency.
- Records compliance assessments performed in support of any agency notifications or reports.

The requirements of this standard also apply to mobile vehicle refinishing operations that bring the coating equipment to the repaired vehicle. The EPA decided to exempt mobile coating operations that perform repairs of small stone chips and scratches. Therefore, touch up and repair operations that apply coatings using a spray gun with a cup size of less than 3.0 fluid ounces do not need to comply with these requirements.

The EPA estimates that the new coating standard will not have a significant financial impact on vehicle coating operations. These operations are already required by the Occupation Health and Safety Administration (OSHA) standards to perform spray painting in a booth or similar enclosure. However, the EPA standard specifies that the booths are to be equipped with filters to sufficiently control HAP emissions, which is not addressed in the OSHA standard. They also believe that training costs will be minimal because many facilities already send their painters to training sponsored by paint companies and trade organizations. Paint companies sponsor training so that they can reduce warranty claims on their paint products. Additionally, they believe that training cost will be offset by reduced coating costs if the training results in reduced coating consumption.

Paint Stripping Operations

Automotive refinishing operations that use MeCl to strip paint from surfaces prior to coating must put in place a plan for implementing management practices to minimize emissions of MeCl. The plan must evaluate the necessity of using MeCl in the stripping operation and whether alternative materials or methods are feasible. Alternative methods may include non- or low MeCl containing chemical strippers, mechanical stripping, blasting with wet or dry media and thermal or cryogenic decomposition. The plan must also describe management practices to optimize use of the material, reduce exposure to the air, and proper storage and disposal of materials containing MeCl.

Usage records must be maintained and used to calculate annual usage quantities. MeCl usage quantities can be calculated by multiplying the number of gallons used times the stripping material density (lbs/gal, found in the MSDS) and then multiply the product times the weight percentage of MeCl (also found in the MSDS).

Facilities that use more than one ton of MeCl per year must also establish a written "MeCl Minimization Plan" (Plan) and notify the EPA or delegated state agency when the Plan is completed. They must keep a copy of the Plan on site and post placards or signs outlining the evaluation criteria and management practices.

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