

Air Quality Requirements for Paint Stripping and Surface Coating Operations

In January 2008 the Environmental Protection Agency finalized a rule for controlling hazardous air pollutants from businesses engaged in paint stripping, motor vehicle and mobile equipment surface coating operations, and/or miscellaneous surface coating operations. This rule seeks to reduce the emission of toxic metals into the air by establishing emission standards in the form of generally available control technologies and management practices.

DEQ adopted the federal rule by reference in December 2009.

Does this rule apply to my facility?

The requirements of the rule apply to facilities where the following activities occur:

- Chemical paint stripping using methylene chloride to remove dried paint from wood, metal, plastic and other substrates
- Spray application of toxic metal (compounds of chromium, cadmium, lead, nickel or manganese) containing coatings to:
 - Motor vehicles and mobile equipment (Mobile equipment includes heavy duty trucks, buses, airplanes, construction and agricultural equipment, self-propelled vehicles, and other equipment that may be drawn and/or driven on a roadway)
 - Any part or product made of metal or plastic

If you can demonstrate that you do not spray-apply coatings that contain any of the toxic metals listed above, you could be exempt:

- Motor vehicle or mobile equipment: Submit an exemption petition to DEQ. To be exempt, your petition must be approved by DEQ
- Metal or plastic parts or products: An exemption petition is not required; however, you should submit an exemption declaration form and must keep records, such as Material Safety Data Sheets (MSDS), on site for verification.

The rule does not apply to:

- Operations performed on site at installations owned or operated by the U. S. Armed Forces
- Operations that produce military munitions or equipment directly or exclusively used for transporting military munitions

- Surface coating operations performed by individuals on their personal vehicles, property or possessions either as a hobby or for maintenance, provided they coat no more than two vehicles or pieces of mobile equipment per year. You must keep records on site, and have them readily available, demonstrating that your activities are within these limits
- Activities meeting the definition of “research and laboratory activities” or “quality control activities”
- Surface coating operations using “only” non-refillable aerosol cans and/or three ounce or smaller paint cups

What are the requirements of the rule?

Paint Stripping

Implement management practices that minimize emissions of methylene chloride. Specifically:

- Evaluate the need for paint stripping and when available use alternative methods such as:
 - Non or low methylene chloride containing chemicals
 - Mechanical stripping/blasting (dry or wet)
 - Thermal stripping
 - Cryogenic decomposition
- Optimize application conditions by using lower temperatures
- Reduce time strippers are exposed to the air
- Perform proper storage and disposal activities
- Maintain annual usage records of methylene chloride containing paint strippers¹

Operations using more than one ton of methylene chloride annually must also comply with the following:

- Develop written methylene chloride minimization plan
- Review plan annually and update based on previous year experiences and availability of new stripping methods.
- Keep copy of plan, reviews and changes made on file

Surface Coating

Paint booths, prep stations and enclosures

For complete motor vehicles or mobile equipment:

¹ Consult your MSDSs to identify the amount of MeCl contained in the paint stripper being used



State of Oregon
Department of
Environmental
Quality

Air Quality Division Business Assistance Program

811 SW 6th Avenue
Portland, OR 97204
Phone: 503-229-5376
Fax: 503-229-5675
Contact: [Rebecca Hillwig](mailto:Rebecca.Hillwig@deq.or.gov)
<http://www.oregon.gov/DEQ>

Paint Stripping and Surface Coating (NESHAP Subpart 6H) Contacts:

Northwestern Oregon
George Dumas (Gresham)
503-667-8414, X55024

Western Region
Steve Croucher
for Auto Body Shops
(Medford and Coos Bay)
541-776-6107

Wayne Kauzlarich (Medford)
541-776-6136

Martin Abts (Coos Bay)
541-269-2721 x222

John Taylor (Salem)
503-378-5314

Eastern Region
Tom Hack (Pendleton)
541-278-4626

Frank Messina (Bend)
541-633-2019

Lane County
Lane Regional Air Protection
Agency
Max Hueftle
1010 Main St.
Springfield, OR 97477
541-736-1056, X231

- A full roof, four complete walls or side curtains and ventilated at negative pressure
 - If booth has seals on all doors and openings and an automatic pressure balancing system, it may be operated up to 0.05 inches water gauge positive pressure

For the surface coating of miscellaneous parts or products or vehicle subassemblies:

- A full roof, at least three complete walls or side curtains, and ventilated so that air is drawn into the booth

For mobile painting operations

- All applicable requirements apply unless exclusively using three ounce cups or less. Mobile enclosures can be used

For all surface coating operations

- Install and operate filter technology that is rated by the manufacturer at 98 percent or greater capture efficiency
- Train and certify all painters on proper spray techniques, proper spray gun setup and maintenance, and environmental compliance
- Apply coatings with a high-volume low-pressure spray gun (HVLP), electrostatic application, airless or air-assisted airless spray gun, or equivalent technology appropriate for the application it is being used for
 - Equivalency must be approved by EPA
- Clean spray guns so that an atomized mist or spray of solvent is not created outside of the container for collecting the used solvent. Gun cleaners or hand cleaning are best
- Train and certify all new painters no later than 180 days after hire date and perform refresher training for all painters every five years

What are my permitting requirements/options?

Shops must apply for a general permit or register with DEQ and pay the following fees:

General Permit: Fee is \$720 per year
Registration: Fee is \$240 per year

Note: To qualify for registration, you must be Eco-Biz certified (ecobiz.org). Shops can choose Eco-Biz certification at any time to go from a permit to registration. To be Eco-Biz certified, you must:

- Go beyond-compliance; and
- Obtain environmental certification

Shops with chronic or ongoing compliance issues must apply for and obtain a simple permit, and pay the following fee:

Simple permit: Fee is \$1,920 - \$3,840 per year

Applications submitted after May 26, 2011:

You will be required to pay the initial application fee of \$1200. Prior to this date DEQ is waiving the fee.

No permit is required: If you are an auto body shop and use less than 20 gallons of coatings per year or paint less than 10 cars per year. You must still comply with the rules and keep records onsite as proof.

Petitioning for an exemption once you have a permit: If your facility is on a permit and you stop using coatings that contain the regulated toxic metals (compounds of chromium, cadmium, lead, nickel or manganese), you can petition DEQ for exemption from the rule and permitting. You must keep records onsite as proof.

What is my compliance date?

The compliance date has passed. Facilities must be in compliance with the rule. New facilities must also be in compliance upon start-up

What are my reporting requirements?

- Initial Notification:
Existing facilities: past due
New facilities: 180 calendar days after startup
- Notification of Compliance:
Existing facilities: March 11, 2011
New facilities: 180 calendar days after startup
- Annual report:
Required each year by February 15

Other recordkeeping requirements?

In addition to the records mentioned above, the following should be maintained and made readily available for review onsite for five years:

- Notifications, reports, supporting documentation and records showing compliance with all required management practices and pollution prevention practices
- Painter training certification and supporting documentation
- Filter efficiency documentation
- Filter change out logs
- Spray gun transfer efficiency
- MSDSs for all spray-applied coatings

Agency Contacts

If you have questions or need assistance, please contact a DEQ representative

Alternative Formats

Alternative formats of this document can be made available. Contact DEQ Public Affairs for more information 503-229-5696.