



Compliance with EPA's Body Shop Hazardous Air Pollutant Rule

NOTIFICATION DUE 1/11/10

INTRODUCTION

The Clean Air Act requires the U.S. Environmental Protection Agency (EPA) to set National Emissions Standards for Hazardous Air Pollutants (HAP), for both large "major" sources and smaller "area" sources, such as dealership auto body shops.

EPA issued a rule entitled, *NESHAP: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources* (the Rule) in January, 2008. The Rule is found at: www.epa.gov/ttn/atw/area/fr09ja08.pdf. It impacts automobile and truck dealerships engaged in paint stripping and auto body refinishing by requiring controls on the potential emission of methylene chloride (MeCl), cadmium, chromium, lead, manganese, and nickel. These HAPs are often found in paint strippers, primer corrosion protectants, and paint system topcoat pigments. Compliance requires auto body shops to take steps to see that proper equipment and management practices are in place with respect to:

- Mixing rooms and equipment;
- Spray booths, ventilated prep stations, curing ovens, and associated equipment;
- Spray guns and associated equipment;
- Spray gun cleaning equipment;
- Equipment used to store, handle, recover, or recycle cleaning solvents and waste paints; and
- Equipment used for paint stripping using strippers containing MeCl

COMPLIANCE DATES

For most dealership auto body shops, an initial notification must be made to EPA by January 11, 2010. Body shops in existence prior to September 17, 2007, have until January 10, 2011, to comply with the Rule. New (or reconstructed) auto body shops beginning operation after September 17, 2007, have until their date of initial startup to comply. *Initial startup* occurs when paint stripping or surface coating equipment is first brought online and paint stripping or surface coating operations are first performed.

PAINT STRIPPING

MeCl is found in some commercial paint strippers or removers. The Rule governs these products if used to remove dried paint (e.g., enamel, varnish, shellac, and lacquer) from wood, metal, plastic, and other substrates. The primary means of human exposure to MeCl is through vapor inhalation. Dealership body shops should attempt to minimize evaporative losses of MeCl from paint strippers by:

- Avoiding paint stripping where unnecessary.
- Only using no- or low-MeCl containing paint strippers
- Using paint removal options that do not involve MeCl paint strippers
- Optimizing application conditions when using MeCl paint strippers
- Minimizing the exposure of MeCl paint strippers to the air during use
- Properly storing and disposing of MeCl paint strippers

Shops must document their annual usage of MeCl paint strippers. If more than one ton of MeCl strippers is used annually, a written MeCl emission minimization plan must be developed and implemented. Dealership auto body shops should be able to avoid using more than one ton of MeCl stripper per year by *limiting its use as much as possible*.

AUTO BODY REFINISHING

Auto body shops should strive to use paint system components that do not contain the HAPs listed above. HAP free shops may [petition EPA for an exemption from the rule](#).

Dealership auto body shops that spray coatings containing HAPs should:

- Paint only inside filtered, ventilated paint booths or prep stations.
 - Prep stations and spray booths large enough to hold complete vehicles must have four complete side walls or curtains and a complete roof. Smaller booths and prep stations must have full roofs and at least three walls or side curtains.
 - Prep stations and spray booths must be fitted with filters demonstrated to achieve at least 98 percent filter efficiency of paint overspray.
 - Use high transfer efficiency application equipment (e.g., high volume, low pressure (HVL) spray guns, electrostatic, airless, air-assisted airless guns).
 - Clean guns with non-hazardous solvents, in gun-enclosed washers, or by another method that does not involve atomized spraying into the open air (e.g., by cleaning disassembled gun parts by hand).
 - Have all painters properly trained and certified every five years
 - Painters at existing sources must be trained and certified by the later of January 10, 2011, or 180 days after hire. Painters at new sources must complete training by 180 days after hire. Training completed in the five years prior to an applicable deadline will suffice.
 - Painter training must address:
 - Gun selection, set up, and operation; including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.
 - Spray techniques for different coating types to maximize transfer efficiency and minimize coating usage and overspray, including maintaining the correct gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying.
 - Routine booth and filter maintenance, including proper filter selection and installation
- See: www.epa.gov/collisionrepair/training.html for further training info.

NOTIFICATION AND RECORDKEEPING

Initial Notification

Dealership auto body shops using MeCl strippers or spray coatings containing one or more of the HAPs listed above must submit an Initial Notification Form to EPA and to the state. Existing shops must submit the initial notification by no later than January 11, 2010. New shops have until 180 days after initial startup to submit the Form.

Notification of Compliance Status

New auto body shops should certify compliance in the [Initial Notification Form](#) mentioned above. *Existing* dealership auto body shops may certify compliance in the Initial Notification Form mentioned above, or in a separate [Notification of Compliance Status](#) which must be submitted by no later than March 11, 2011.

Reports

If any of the information in an Initial Notification Form or Notification of Compliance Status Form changes, auto body shops must submit a [Notification of Changes Report to EPA](#) by March 1 of the following year. No regular annual reporting is required.

Records Retention

Keep copies of the following records for at least 5 years after the date created:

- Initial Notification Form, Compliance Status Notification Form, and Notification of Changes Report Forms
- Painter training certifications, with initial training and refresher dates
- Spray booth filter efficiency and spray gun transfer efficiency documentation
- Documentation of MeCl paint strippers sufficient to demonstrate annual usage.

FOR FURTHER INFORMATION

EPA Regional Contacts: www.epa.gov/ttn/atw/area/regional_contacts.pdf

Auto Body Compliance Assistance Center: www.ccar-greenlink.org/

EPA Collision Repair Campaign: www.epa.gov/collisionrepair/index.html

Contact your paint system supplier.

Please direct questions concerning this Bulletin to NADA Legal and Regulatory Affairs at 703-821-7040 or regulatoryaffairs@nada.org.