



# Lincoln-Lancaster County Health Department

## Air Quality Program

### 40 CFR Part 63 Subpart HHHHHH – Initial Notification / Notification of Compliance Status

#### What is the purpose of this rule?

- The United States Environmental Protection Agency (US EPA) issued [40 CFR Part 63, Subpart HHHHHH \(National Emission Standards for Hazardous Air Pollutants for Source Category: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources\)](#) to establish emission limitations and standards to reduce/control hazardous air pollutants (HAP) emitted from paint stripping operations, autobody refinishing operations, and operations that perform paint spraying of metal and plastic parts and substrates. This subpart only applies to such operations that are 'area sources' of HAPs. An *area source* is a facility with total potential to emit less than 10 tons of any individual HAP, and less than 25 tons of total combined HAPs.

#### Who is subject to this rule?

- You are subject to this rule if you own or operate a 'new' or 'existing' facility that performs any of the following:
  - Paint stripping using chemicals that contain methylene chloride (MeCl) (CAS# 75-09-2); or
  - Spray-apply coatings to motor vehicles and/or mobile equipment, or to plastic or metal parts or products.
- Your source is 'new' if you commenced construction or reconstruction of the affected source after September 17, 2007 by installing and using new paint stripping or surface coating equipment at a source that was not actively engaged in paint stripping and/or miscellaneous surface coating prior to that date.
- Your source is 'existing' if you do not meet the criteria for a 'new' source. Purchasing new equipment does not make an existing source a new source.

#### What painting spraying and paint stripping activities are not subject to this rule?

- 'Facility maintenance', painting of 'space vehicles', 'research/laboratory activities', and 'quality control activities' as defined in Subpart HHHHHH;
- Painting using non-refillable aerosol cans, hand-held device with a paint cup capacity that is less than or equal to 3 fluid ounces, powder coating, or other non-spray painting methods;
- Paint spraying/paint stripping performed at U.S. military installations, painting of military munitions, painting of equipment used directly and exclusively to transport military munitions;
- Hobby/maintenance painting by individuals on their personal vehicles/possessions/ property, provided that individuals do not apply spray coating to more than two vehicles or pieces of mobile equipment per year.

#### When am I required to comply with this rule?

- All affected sources must currently be in compliance, or must comply with the rule upon start-up.

#### What is the purpose of this form, and when do I need to submit it?

- The purpose of this form is to notify the Lincoln-Lancaster County Health Department (LLCHD) and the US EPA that your facility is subject to the requirements of this rule, and to provide those agencies with needed information.
- You **must** complete and submit this form to both the LLCHD and US EPA. If you own/operate an 'existing' source, and you have not already completed and submitted this form, you must do so immediately. If you construct and start-up a 'new' source, you must submit this form within 180 days of initial start-up.
- This document **must** be signed and certified by an individual who meets the definition of a 'Responsible Official' set forth in [Article 2, Section 1 of the Lincoln-Lancaster County Air Pollution Control Program Regulations and Standards](#).

#### Where do I send the completed form?

- Send a copy of the signed and completed form to each of the following. Keep an additional copy for your records.

Lincoln-Lancaster County Health Department	US EPA Region 7
ATTN: Air Quality Program	ATTN: AWMD-APCO
3131 O Street	11201 Renner Blvd.
Lincoln, NE 68510	Lenexa, KS 66219

**If you have any questions about this rule, or need any help completing this form, please call the LLCHD Air Quality Program at (402) 441-8040.**



**Section 4: Description of Affected Source**

If you intend to submit a ‘Petition for Exemption’ from the requirements of Subpart HHHHHH, then you are only required to complete Section 4 of this notification form. Please download and submit a ‘Petition for Exemption’ at the same time you submit this form. The ‘Petition for Exemption’ is available on the [LLCHD Air Quality Program Forms and Applications webpage](#). If you are not pursuing exemption from the rule, complete and submit the remainder of this form.

<b>1. Check the box below that correctly describes your facility’s date of construction or reconstruction.</b>							
<input type="checkbox"/>	Constructed or reconstructed on or before September 17, 2007 = ‘Existing source’						
<input type="checkbox"/>	Constructed or reconstructed after September 17, 2007 = ‘New source’						
<b>2. Check the appropriate box, or boxes, below that reflects the type(s) of paint stripping performed at your facility. Check all that apply.</b>							
<input type="checkbox"/>	There is no paint stripping performed at this facility. <i>(Skip questions 3 and 4)</i>						
<input type="checkbox"/>	Paint stripping is performed using mechanical methods (sanding, blasting, grinding, etc.).						
<input type="checkbox"/>	Paint stripping is performed using chemicals that <u>do not</u> contain methylene chloride (MeCl).						
<input type="checkbox"/>	Paint stripping is performed using chemicals that <u>do</u> contain methylene chloride (MeCl).						
<b>3. If paint stripping is performed at your facility, indicate the types of materials (i.e. substrates) on which paint stripping is performed.</b>							
<input type="checkbox"/>	Wood						
<input type="checkbox"/>	Plastic						
<input type="checkbox"/>	Metal						
<input type="checkbox"/>	Other (describe):						
<b>4. If you perform chemical paint stripping at your facility using chemicals that contain methylene chloride (MeCl), indicate which of the following describes your facility.</b>							
<input type="checkbox"/>	Not applicable, paint stripping is either mechanical, or uses chemicals that do not contain any methylene chloride (MeCl).						
<input type="checkbox"/>	The facility uses one ton or less ( $\leq 1$ ton) of methylene chloride (MeCl) annually.						
<input type="checkbox"/>	The facility uses more than one ton ( $> 1$ ton) of methylene chloride (MeCl) annually.						
<b>5. Please provide the following information as it pertains to your ‘Surface Coating Operation’. If you do not perform surface coating, you may skip this question and proceed the following sections.</b>							
<input type="checkbox"/>	Not applicable. This facility does not perform any surface coating, or does not perform surface coating on plastic or metal parts, products, or materials.						
<input type="checkbox"/>	This facility is a ‘Motor Vehicle’ or ‘Mobile Equipment’ surface coating operation						
<input type="checkbox"/>	This facility is a miscellaneous surface coating operation						
	In the space provided to the left, indicate the number of spray booths at your facility.						
	In the space provided to the left, indicate the number of paint preparation stations at your facility.						
	In the space provided to the left, indicate the number of painters usually employed at your facility.						
If the source is a motor vehicle or mobile equipment surface coating operation, are vehicles repaired at the customer’s location, rather than at a fixed location? <table style="float: right;"> <tr> <td><input type="checkbox"/></td> <td>Yes</td> </tr> <tr> <td><input type="checkbox"/></td> <td>No</td> </tr> <tr> <td><input type="checkbox"/></td> <td>N/A</td> </tr> </table>		<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A
<input type="checkbox"/>	Yes						
<input type="checkbox"/>	No						
<input type="checkbox"/>	N/A						

**Section 5: Compliance Status Questions for Methylene Chloride (MeCl) Stripping Operations**

The following questions apply only to affected sources that perform paint stripping using methylene chloride (MeCl). If your facility does not perform any methylene chloride paint stripping, skip the questions in this section and proceed to Section 6.

<p>1. Subpart HHHHHH §63.11173(a) requires that each paint stripping operation that is an affected area source must implement management practices to minimize the evaporative emissions of MeCl. These management practices must address, at a minimum, the following:</p> <ul style="list-style-type: none"> <li>• Evaluate each application to ensure there is a need for paint stripping (e.g., evaluate whether it is possible to re-coat the piece without removing the existing coating).</li> <li>• Evaluate each application where a paint stripper containing MeCl is used to ensure that there is no alternative paint stripping technology that can be used.</li> <li>• Reduce exposure of all paint strippers containing MeCl to the air.</li> <li>• Optimize application conditions when using paint strippers containing MeCl to reduce MeCl evaporation (e.g., if the stripper must be heated, make sure that the temperature is kept as low as possible to reduce evaporation).</li> <li>• Practice proper storage and disposal of paint strippers containing MeCl (e.g., store stripper in closed, air-tight containers).</li> </ul> <p><u>Do you currently utilize these management practices to minimize evaporative emissions of MeCl at your facility?</u></p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>2. Subpart HHHHHH §63.11173(b) requires that each paint stripping operation that has annual usage of more than one ton (&gt; 1 ton) of MeCl must develop and implement a written MeCl minimization plan to minimize the use and emissions of MeCl. This management plan must address, at a minimum, the five management practices listed in question 1 above. In addition, each operation must post a placard or sign outlining the MeCl minimization plan in each area where MeCl paint stripping operations occur.</p> <p><u>Have you developed and implemented a written MeCl minimization plan, and placed the required placards in each area where MeCl paint stripping occurs?</u></p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>3. Subpart HHHHHH §63.11173(c) requires that each MeCl paint stripping operation must maintain copies of annual usage of paint strippers containing MeCl on site at all times.</p> <p><u>Do you currently maintain records of annual usage of paint strippers containing MeCl on site?</u></p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>4. Subpart HHHHHH §63.11173(d) requires that each MeCl paint stripping operation with annual usage of more than one ton (&gt; 1 ton) of MeCl must maintain a copy of their current MeCl minimization plan on site at all times.</p> <p><u>Do you currently maintain a copy of the current MeCl minimization plan on site?</u></p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>5. Subpart HHHHHH §63.11177(g) requires that you maintain records of any deviations from the requirements of the rule, including:</p> <ul style="list-style-type: none"> <li>• The date and time period of the deviation(s);</li> <li>• A description of the nature of the deviation(s); and</li> <li>• The actions taken to correct the deviation(s).</li> </ul> <p><u>Do you currently maintain deviation records on site?</u></p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>6. Subpart HHHHHH §63.11176(a) requires that you prepare and submit a ‘notification of changes’ report for any year during which there are changes to information previously submitted with an initial notification, notification of compliance status, or a prior notification of changes report. This report is also required for years during which there was one or more deviations at your facility. If your notification indicates that you use less than 1 ton of MeCl, and you later exceed 1 ton of MeCl, you must notify the LLCHD of this change. <u>Do you agree to submit these ‘notification of changes’ reports when required?</u></p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>

**Section 6: Compliance Status Questions for Surface Coating Operations**

The following questions apply only to ‘motor vehicle and mobile equipment surface coating operations’ and ‘miscellaneous surface coating operations’. If your facility does not perform surface coating on motor vehicles, mobile equipment, or on miscellaneous plastic or metal parts, products, or materials, then this section does not apply to your facility. Submit this completed form to the LLCHD and the U.S. EPA as instructed on the cover page. If you are submitting a ‘Petition for Exemption’ from Subpart HHHHHH, submit your completed exemption form along with this form.

<p>1. Subpart HHHHHH §63.11173(e), (f), and (g) requires that:</p> <ul style="list-style-type: none"> <li>• All painters must be trained and certified on spray gun equipment selection, spray techniques, maintenance, and environmental compliance within 180 days of hiring (refer to §63.11173(f)(2)(i-iv) of Subpart HHHHHH for more information). Painters must receive refresher training and must be re-certified every 5 years.</li> <li>• Owners/operators must install and operate paint overspray filter technology on all spray booths, filters, and enclosures to achieve at least 98% capture efficiency.</li> <li>• Spray-applied coatings must be applied with a high-volume, low-pressure (HVLP) spray gun, electrostatic application; airless or air-assisted airless spray gun, or an equivalent technology.</li> <li>• Paint spray gun cleaning must be done so that an atomized mist or spray of the cleaning solvent is not created outside a container that collects used gun cleaning solvent.</li> </ul> <p><u>Does your facility currently comply with all of these requirements?</u></p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>2. <u>For spraying of complete motor vehicles and/or mobile equipment only</u>, Subpart HHHHHH §63.11173(e) requires that spray booths and preparation stations must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. However, if a spray booth is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to, but not more than, 0.05 inches water gauge positive pressure. This</p> <p><u>If you perform paint spraying on complete motor vehicles and/or mobile equipment, do all spray booth and preparation stations in which such painting occurs comply with these requirements?</u></p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>3. <u>For spraying of miscellaneous metal and plastic parts and products, as well as vehicle subassemblies</u>, Subpart HHHHHH §63.11173(e) requires that spray booths and preparation stations must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of a booth may have openings, if needed, to allow for conveyors and parts to pass through the booth during the coating process.</p> <p><u>If you perform paint spraying on miscellaneous metal and plastic parts and products and/or vehicle subassemblies, do all spray booth and preparation stations in which such painting occurs comply with these requirements?</u></p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>
<p>4. <u>For paint spraying in mobile ventilated enclosures used to perform spot repairs</u>, Subpart HHHHHH §63.11173(e) requires that enclose and, if necessary, seal against the surface around the area being coated such that paint overspray is retained within the enclosure and directed to a filter to capture paint overspray.</p> <p><u>If you perform paint spraying in mobile ventilated enclosures for performing spot repairs, do the mobile enclosures comply with these requirements?</u></p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>

<p>7. Subpart HHHHHH §63.11177(g) requires that you maintain records of any deviations from the requirements of the rule, including:</p> <ul style="list-style-type: none"> <li>• The date and time period of the deviation(s);</li> <li>• A description of the nature of the deviation(s); and</li> <li>• The actions taken to correct the deviation(s).</li> </ul> <p><u>Do you currently maintain deviation records on site?</u></p>	<input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b>
<p>8. Subpart HHHHHH §63.11176(a) requires that you prepare and submit a 'notification of changes' report for any year during which there are changes to information previously submitted with an initial notification, notification of compliance status, or a prior notification of changes report. This report is also required for years during which there was one or more deviations at your facility. If your notification indicates that you are not subject to the rule, or if you petition for exemption from the rule, you must submit a notification of changes report to the LLCHD if you later become subject to the rule due to the way you conduct painting, the types of coatings used, or other reasons as applicable.</p> <p><u>Do you agree to submit these 'notification of changes' reports when required?</u></p>	<input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b>