

New EPA Regulations for Miscellaneous Surface Coating Operations
August, 2008
40 CFR Part 63 Subpart HHHHHH

EPA has new requirements to reduce air pollution of methylene chloride, chromium, lead, manganese, nickel, and cadmium from surface coating (painting) operations. These pollutants pose health risks to anyone who breathes the air that contains them. Many paints used in surface coating work contain these metals. The new regulations require surface coating businesses to do several things to prevent these pollutants from getting into the air during spray painting.

This is a short summary of things a paint shop must do before January 2011. New shops must do all these before beginning to paint. Although EPA has no requirements for hobbyists or private citizens, the following are also good practices to improve the air for anyone exposed to surface coating fumes. Most paint shops already do these things.

The surface coating rules will annually reduce about 14 million pounds of hazardous air pollutants. Any initial costs to you when beginning to meet this rule will quickly be made up by your cost savings as a result of better use of labor and materials. The rule can be found at: <http://www.epa.gov/ttn/atw/area/fr09ja08.pdf> Also a minor correction notice is at: <http://www.epa.gov/ttn/atw/area/fr13fe08.pdf>

For more details and assistance, please talk to your paint providers or EPA regional office. These web links to government contacts are a good place to start:

- http://www.epa.gov/ttn/atw/area/regional_contacts.pdf
<http://www.smallbiz-enviroweb.org/sba/sbap.html>

All surface coating facilities must:

- Train/certify all painters on spray gun selection, spray techniques, maintenance, and environmental rules.
- Install and operate filters in ALL spray booths, stations and enclosures to catch at least 98% of the fumes.
- 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 similar application method.
- Paint spray gun cleaning must be done so that no fumes escape during cleaning.
- Send a notice that you are an owner or operator, to your local EPA office: [addresses](#) are at the bottom of this example notification form: http://www.epa.gov/ttn/atw/area/paint_strip_example.doc

Additionally, facilities must keep the following records on file:

- Copies of Notifications submitted to EPA (an example to use can be found at: http://www.epa.gov/ttn/atw/area/paint_strip_example.doc)
- Painter training certifications.
- Spray booth filter efficiency documentation.

- Spray gun transfer efficiency.

Please note exemptions to the rule are facility maintenance activities, which include the application of coatings to stationary structures or their appurtenances at the site of installation (such as bridges), to portable buildings at the site of installation, to pavements, or to curbs.