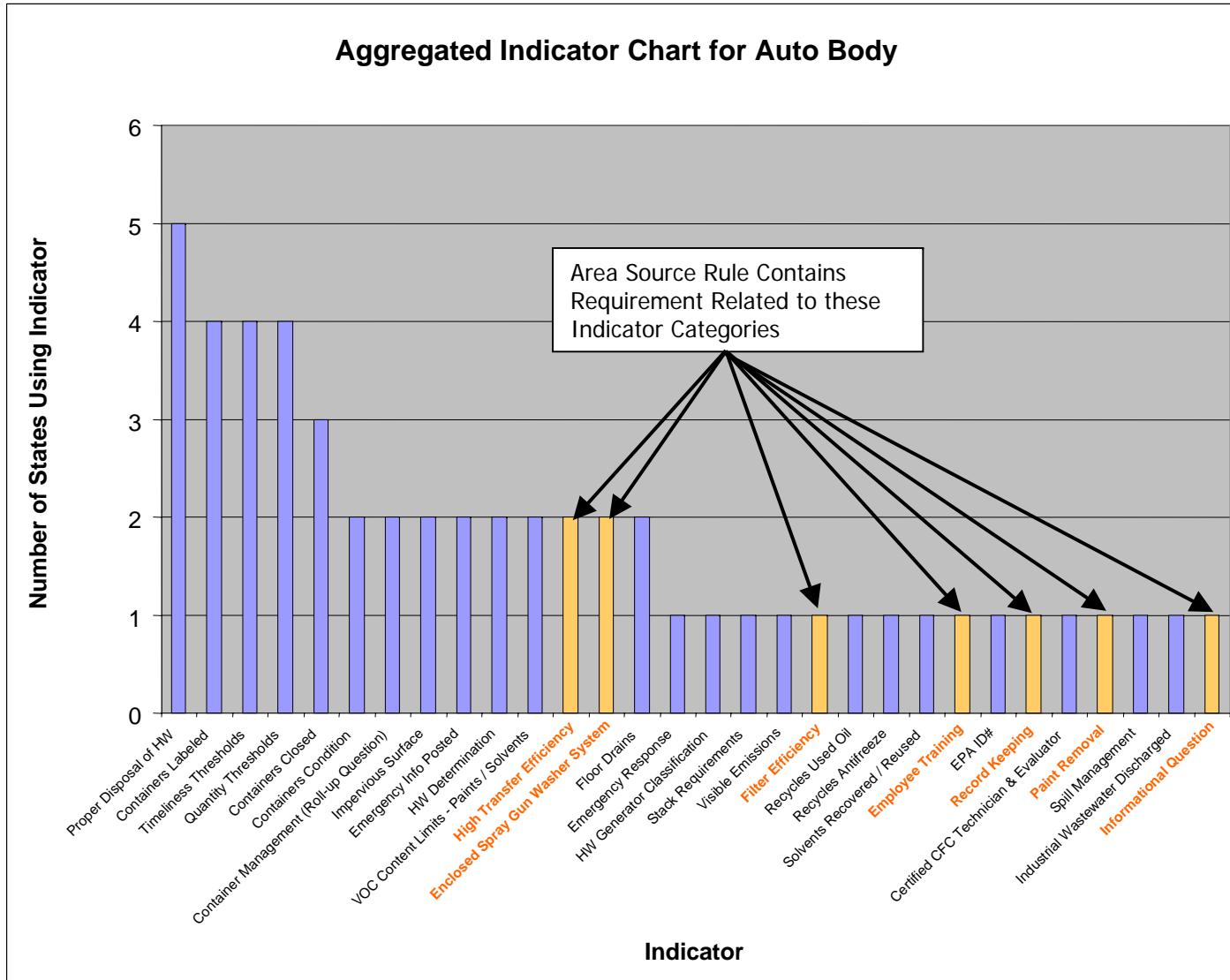


## Overlay of Area Source Rule Requirements and State ERP Indicators for Auto Body Shops



**Comparison of State ERP Indicators for Auto Body Shops and Requirements Included in the Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources Proposed Rule**

Auto Body Indicators/Requirements											
Indicator Category - includes only those related to air emissions	CA	CO	CT	MA	ME	NH	NJ	NY	RI	VT	Area Source Rule Requirements <b>**NOTE: This table shows only a summary of requirements, and does not represent the full requirements included in the proposed rule.**</b>
											The proposed rule applies to area sources of hazardous air pollutants (HAP) that perform paint stripping and use a paint stripper that contains MeCl AND/OR perform surface coating operations, including auto body refinishing. The rule does not apply to military or NASA operations.
VOC Content Limits - Paints / Solvents				The <b>VOC content</b> of any preparation / cleanup solution does not exceed 1.67 pound per gallon.		1. Facility only uses EPA approved <b>Low VOC paint</b> 2. Parts washing done with <b>low VOC solvents</b> in approved units					
Stack Requirements				1. The <b>stack conforms</b> with regulatory standards 2. Emissions from <b>stack</b> have 0% <b>opacity</b> .							
Visible Emissions					Do any airborne <b>emissions</b> from painting / coating <b>leave</b> the business <b>premises</b> ?						
High Transfer Efficiency				<b>Paint spray guns</b> use either <b>electrostatic spray application</b> method or High Volume Low Pressure ( <b>HVLP</b> ) application method.		<b>HVLP Spray guns</b> utilized					All spray-applied coatings must be applied with a <b>HVLP spray gun, electrostatic application, or an equivalent technology</b> .
Enclosed Spray Gun Washer System				<b>Spray gun cleaning</b> is performed in a totally <b>enclosed</b> gun washer system.				The <b>spray gun cleaning device</b> is totally <b>enclosed</b> during cleaning, rinsing, and draining operations			All paint spray gun cleaning must be done with either <b>non-HAP gun cleaning solvents, or with a fully enclosed spray gun cleaner</b> . Hand cleaning of parts of the disassembled gun, such as the air cap, with HAP containing solvent is permitted. Spraying of atomized or non-atomized HAP-containing cleaning solvent through the gun outside of the enclosed portion of the gun cleaner, or when the gun cleaner is opened, is prohibited
Filter Efficiency				1. Paint spray booth achieves <b>particulate control efficiency of 97% by weight</b> . 2. The face velocity of air at the <b>filter</b> shall not exceed 200 feet per							All spray booths and preparation stations must be fitted with <b>polyester fiber or fiberglass particle filters on the exhaust</b> , or must be fitted with a type of filter technology that is demonstrated to achieve at least <b>98-percent capture of paint overspray</b> .
Solvents Recovered / Reused						<b>Solvents</b> recovered/reused					

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Employee Training					Does the shop <b>train</b> all <b>employees</b> in the proper use and handling of paints and coatings according to the manufacturers' recommendations to minimize air emissions?						<p>All painters must be certified that they have <b>completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment</b>. The training must meet certain minimum requirements specified in the rule, including initial and refresher training with hands-on and classroom components that addresses the following requirements:</p> <ul style="list-style-type: none"> <li>- Surface preparation</li> <li>- Spray gun set up and operation and spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray</li> <li>- Routine spray booth and filter maintenance</li> <li>- Paint mixing, matching, and applying</li> <li>- Solving paint application problems</li> <li>- Finish defects causes and cures</li> <li>- Safety precautions</li> <li>- Environmental compliance</li> </ul> <p>The training program must also include a list of all current personnel who must be trained and a description of the methods to be used to demonstrate, document, and provide certification of successful completion of the required training.</p> <p>The facility owner or operator must certify that all painters have taken this training within a specified time period (for new sources, 60 days of hiring or publication of the final rule, whichever is later; for existing sources, 2 years after promulgation of final rule). Training is valid for five years.</p>
Record Keeping				Sufficient <b>records</b> are maintained to demonstrate compliance.							<p>Paint stripping operations must maintain <b>records of paint strippers containing MeCl used</b>. Paint strippers that use 150 gallons or more of paint stripper containing MeCl must meet additional requirements. Surface coating operations must maintain records regarding <b>painter training certification</b>, documentation of filter efficiency for spray booth filters that are not made of polyester fiber or fiberglass, documentation regarding HVLP-equivalent spray guns, and <b>documentation of notices and reports required by the rule</b>. All facilities regulated under the rule must also keep records pertaining to any deviations from requirements allowed under the rule.</p>
Certified CFC Technician & Evaluator						Facility has <b>certified CFC</b> technician & EPA-certified CFC evacuator					

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Paint Removal									Facility does not use methylene chloride <b>paint strippers</b>		<p>The proposed area source rule requires <b>paint stripping operations that use paint strippers containing MeCl</b> to:</p> <ol style="list-style-type: none"> <li>1) implement certain management practices to minimize MeCl evaporative emissions, including: <ul style="list-style-type: none"> <li>- Evaluate each application to ensure there is a need for paint stripping</li> <li>- Reduce exposure of all paint strippers containing MeCl to the air</li> <li>- Optimize application conditions to reduce MeCl evaporation</li> <li>- Practice proper disposal of paint stripper containing MeCl</li> </ul> </li> <li>2) Maintain records showing annual usage of MeCl on site</li> <li>3) Meet additional requirements if they use 150 gallons or more of paint stripper containing MeCl per year. However, information from the state of Wisconsin suggests that at least in that state, most paint stripping operations use only a few gallons of paint stripper with MeCl per year, and would not meet the threshold.</li> </ol>
Informational Question						<b>Spray Booths</b> utilized at auto body shops					All spray-applied coatings must be applied in an <b>enclosed, ventilated spray booth or preparation station that is fitted with polyester fiber or fiberglass particle filters on the exhaust</b> (see also filter efficiency indicator category above). (Note, specific requirements depend on whether whole vehicles or parts are being painted.)