

Next Step in Paint Rule Compliance

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The first deadline has now passed for the U.S. Environmental Protection Agency's (EPA) new rule 40CFR63 Subpart HHHHHH of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for **Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources.**

Also known as the NESHAP 6H rule (or simply the "Paint Rule"), the new rule required an *Initial Notification to EPA* be filed by January 11, 2010. That notification was simply to inform the governing agency that a collision repair facility conducts painting activity and is governed by the NESHAP 6H Rule. The governing agency is the federal EPA in most states and the state Air Quality Division in others.

If the facility has not yet filed the *Initial Notification* form, **it must be done immediately.** The form can be downloaded at <http://www.epa.gov/collisionrepair/pdfs/initialnotification.pdf>. Visit our Paint Rule website for detailed information <http://www.ccar-greenlink.org/paintrule.html>.

The NESHAP 6H rule is specific to metal and plastic surface coating operations at area sources such as auto body shops. The purpose of this rule is to reduce emissions of lead, nickel, cadmium, chromium and manganese. These chemicals are designated hazardous air pollutants known or suspected to cause cancer and other adverse health effects and can be found in paint used in the automotive refinishing industry. There is no "grandfather clause" in the rule.

The Paint Rule requirements include:

- Notification Form → by January 2010
- **Paint booth exhaust systems using 98% efficient booth filters**
- **Use of spray booths/prep stations**
- **Use of efficient types of spray guns, such as HVLP**
- **Spray gun cleaning process that does not allow atomization of thinner through gun. An automated enclosed gun wash is recommended**
- Painter training material for gun set-up and spray techniques required, along with a hands-on training requirement → by January 2011
- Final Notification of full compliance → by March 2011
- Five-year continuing education

The Next Step

Collision repair facilities have twelve (12) months in which to meet each of the specific Paint Rule requirements. Shops are encouraged to begin immediately to meet these requirements as some expenses may be incurred. The best “next step” is to tackle the four easiest-to-meet requirements first.

Paint booth exhaust systems must use 98% efficient booth filters

Contact your supplier and begin using these 98% efficient filters now so that you can try out a few different brands to see which one meets your needs and budget.

Keep the manufacturer’s data assuring the efficiency rating of these filters in a file folder on-site at the facility to meet the documentation requirement of the Paint Rule.



Photo courtesy of Air Filter Plus

EPA’s Design for the Environment has conducted extensive research on the auto body industry and has informational resources available. Review their “Spray Booth Filters” fact sheet at

<http://www.epa.gov/dfe/pubs/auto/factsheet/sprayboothfilters.pdf>.

Visit the CCAR-*GreenLink* virtual shop website at <http://www.ccar-greenlink.org/cshops/exhaust.html> for more information.

Spray booths and/or prep stations MUST BE USED

Ensure that all spray activity is being conducted in the paint booth. A spray booth for fully assembled vehicles must have four walls and a roof. Parts may be painted in a prep station of three walls and a roof. Walls may be made up of side curtains.

For most shops, this is simply a matter of making sure the painting takes place in the booth. Not only does this meet the Paint Rule requirement but is a healthy work practice for all employees.

Visit the CCAR-*GreenLink* virtual shop website at <http://www.ccar-greenlink.org/cshops/spraybooth.html> for more information.

Efficient spray guns required for reduced air emissions



Use High Volume, Low Pressure (HVLP) spray guns to meet the Paint Rule requirements and to maximize spray paint efficiency. Good spray technique and the use of these 65% efficient HVLP guns have proven to reduce paint costs and improve finish quality.

Visit the CCAR-*GreenLink* virtual shop website at <http://www.ccar-greenlink.org/cshops/gun.html> or the Design for the Environment website at <http://www.epa.gov/dfe/pubs/auto/spraygun/> for more information.



Healthy spray gun cleaning process required

Implement healthy gun cleaning practices that minimize painter exposure to solvents. Atomization of cleaning solvent through the paint gun (even in the paint booth) is not allowed for cleaning purposes.

Invest in a fully enclosed automatic gun wash system as the best management practice to protect employee health.

Visit the CCAR-*GreenLink* virtual shop website at <http://www.ccar-greenlink.org/cshops/guncleaner.html> for more information.

These four requirements should be simple to implement immediately at the auto body shop. Most shops already have the equipment necessary. For those shops that need to make equipment purchases there is no time like the present to speak to your suppliers. Watch for future CCAR-*GreenLink* articles about Paint Rule-compliant product specifications and training requirements.

For More Information

Go to:

[**EPA Collision Repair Campaign web site**](#)

[**CCAR-*GreenLink* "Paint Rule" page**](#)

U.S. EPA Design for the Environment at <http://www.epa.gov/dfe/pubs/auto/spraygun/>.

E-mail your questions to: paintrule@ccar-greenlink.org