

**INITIAL NOTIFICATION and SURVEY**

Due Date: 1/11/2010

Paint Stripping and Miscellaneous Surface Coating  
Area Source Rule  
40 CFR 63.11169 – 63.11180 Subpart HHHHHH

**Section 1. Facility Information:**

Company Name \_\_\_\_\_

Facility Name (if different) \_\_\_\_\_

Facility(physical location)address:

\_\_\_\_\_  
Street City State Zip

Owner's Name/Title \_\_\_\_\_

Owner's Street Address \_\_\_\_\_  
Street City State Zip

Owner's telephone number \_\_\_\_\_

Owner's email: \_\_\_\_\_

Is the Operator the same person as the Owner? Yes  No

If the Operator information is different please provide the following:

Operator's Name/Title \_\_\_\_\_

Operator's Street Address \_\_\_\_\_  
Street City State Zip Code

Operator's telephone number \_\_\_\_\_

Operator's email \_\_\_\_\_

Are the compliance records located at the same location? Yes  No

If no, location of compliance records:

\_\_\_\_\_  
Street City State Zip

Is the source a motor vehicle or mobile equipment surface coating operation that repairs vehicles at the customer's location, rather than at a fixed location?

Yes  No

**Section 2. A description of your operations:**

**For Surface Coating Operations**

- a. I am a:
  - Motor Vehicle or Mobile Equipment Surface Coating Operation
  - Miscellaneous Surface Coating Operation
- b. Number of spray booths \_\_\_\_\_
- c. Number of preparation stations \_\_\_\_\_
- d. Number of painters usually employed \_\_\_\_\_

### For Paint Stripping Operations

a. Methods of paint stripping employed (check all that apply)

- Chemical  
 Mechanical  
 Other (please describe) \_\_\_\_\_

b. Substrates stripped (check all that apply)

- Wood  
 Plastic  
 Metal  
 Other (please describe) \_\_\_\_\_

### Section 3. Auto Body Paint Stripping Operations:

- a. Does your facility use a Methylene Chloride (MeCl) -based paint stripper? Yes  No
- b. How many gallons of MeCl does your shop use each year? \_\_\_\_\_gallons N/A   
If you use **more than 150** gallons please check **yes** in section 5.  
If you use **less than 150** gallons please check **no** in section 5.
- c. Have you evaluated each application to ensure that there is a need for paint stripping? Yes  No  N/A
- d. Have you considered alternatives (e.g., non-or low-MeCl-containing chemical strippers, mechanical stripping, blasting including dry or wet media, or thermal or cryogenic decomposition) to MeCl -based paint strippers? Yes  No  N/A
- e. Have you reduced all exposures of MeCl to the air? Yes  No  N/A
- f. Have you optimized application conditions to reduce MeCl evaporation? Yes  No  N/A
- g. Do you practice proper storage and disposal of MeCl paint strippers? Yes  No  N/A
- h. Do you maintain copies of the annual usage of paint strippers containing MeCl on site at all times? Yes  No  N/A
- i. If you use more than 150 gallons each year:  
i. Have you implemented a MeCl minimization plan to minimize the use and emissions of MeCl ?  
Yes  No  N/A
- ii. Have you posted a sign outlining the MeCl minimization plan in paint stripping in each area? Yes  No  N/A
- iii. Do you maintain a copy of your current MeCl minimization plan on site at all times? Yes  No  N/A

### Section 4. Auto Body Refinishing Operations:

- a. Are your spray booths/stations used to refinish complete motor vehicles fully enclosed with four walls, a roof, and a ventilated at negative pressure or up to 0.05 inches water gauge positive pressure for booths that have seals on all doors and other openings and an automatic pressure balancing system? Yes  No  N/A
- b. Are your spray booths/stations used to paint parts of motor vehicles have at least three complete walls or side curtains, a full roof, and ventilated so that air is drawn into the booth? Yes  No  N/A
- c. Does the filter technology on all spray booths/stations/enclosures achieve at least 98% capture efficiency?  
Yes  No  N/A
- d. Are spot repairs done in an enclosure which prevents any mist from getting out of the enclosure? Yes  No  N/A
- e. Are spray-applied coatings applied with a high volume, low pressure (HVLV) spray gun, electrostatic application, airless or air-assisted spray gun? Yes  No  N/A
- f. Do you use non-atomizing methods (e.g. hand cleaning of parts or enclosed gun cleaner) when cleaning spray gun equipment to prevent mists/fumes from escaping during cleaning? Yes  No  N/A
- g. Do you train/certify all painters on spray gun equipment selection, spray techniques, maintenance, and environmental compliance requirements? Yes  No  N/A

**Section 5. Identification of Facility:**

- a.  **Yes**, I am subject to 40 CFR Part 63 Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Source; Final Rule

**If you checked the “yes” box above, go to section 6.**

- b.  **No**, I am subject to 40 CFR Part 63 Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Source; Final Rule

Reason not applicable:

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**If you checked the “no” box above, go to Section 7.**

**Section 6. Compliance Status, please complete section A, B or C and sign below:**

**For paint stripping operations:** the requirements are specified in 40 CFR 63.11173(a) through (d) of this subpart.

**For surface coating operations:** the requirements are specified in 40 CFR 63.11173(e) through (g) of this subpart.

**Note:** Initial startup is the first time equipment is brought online in a paint stripping or surface coating operation, and paint stripping or surface coating is first performed.

**A. NEW SOURCE (Initial startup was on or after January 9, 2008).**

- I am a new source (Initial startup was on or after 1/9/ 2008) Start-up Date \_\_\_\_\_
- I was in compliance upon Start-up
- I was in compliance by Date \_\_\_\_\_

**B. NEW SOURCE (Initial startup after September 17, 2007 but before January 9, 2008).**

- I am a new source (Initial startup after 9/17/2007 but before 1/9/ 2008) Start-up Date \_\_\_\_\_
- I was in compliance by 1/9/2008
- I was in compliance by Date \_\_\_\_\_

**C. EXISTING SOURCE (Initial start-up before September 17, 2007) Compliance date is January 10, 2011.**

- Existing source (start-up before 9/17/2007) Compliance date is 1/10/ 2011.

If your source is an existing source, a responsible official, whose information is provided above, may certify below that the source is already in compliance with each of the relevant requirements of this subpart or certification may be done by March 11, 2011 in the Notification of Compliance Status as specified in 40 CFR Section 63.11175(b)

For existing sources:  I am certifying below **or**

- I will certify by March 11, 2011  
(There is no need to sign below; you must sign a statement by March 11, 2011)

I certify the truth, accuracy, and completeness of this notification. The source has complied with all the relevant standards found in the National Emission Standards for Hazardous Air Pollutants : Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources . This initial notification also serves as the notification of compliance status.

Signature of responsible official: owner / operator (circle one) \_\_\_\_\_

Please Print Name \_\_\_\_\_

(A Responsible Official can be: the President, Vice-President, Secretary, or Treasurer of the company that owns the plant, the owner of the plant, the plant engineer or supervisor, the government official if the plant is owned by the Federal, State, City, or County government, or a ranking military official if the plant is located on a military base.)

**Section 7. Certification of Non-Applicability:**

I certify the truth, accuracy, and completeness of this notification. This source is **NOT** subject to the National Emission Standards for Hazardous Air Pollutants : Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources.

Signature of Responsible Official: owner / operator (circle one) \_\_\_\_\_

Please Print Name \_\_\_\_\_

(A Responsible Official can be: the President, Vice-President, Secretary, or Treasurer of the company that owns the plant, the owner of the plant, the plant engineer or supervisor, the government official if the plant is owned by the Federal, State, City, or County government, or a ranking military official if the plant is located on a military base.)

**Please submit Initial Notification and Survey to both of the following addresses:**

**Original:**

**US Environmental Protection Agency  
Attn: Air Compliance Clerk  
5 Post Office Square, Suite 100  
Mail code: OES04-2  
Boston, MA 02109-3912**

**Copy:**

**RI Department of Environmental Management  
Office of Customer and Technical Assistance  
235 Promenade Street  
Providence, RI 02908  
Attn: Michele McCaughey**