

February 25, 2009

SPECIAL NOTICE

NEW NESHAP AIR RULE FOR COATING FACILITIES

The U.S. EPA has issued a new regulation addressing air emissions of Hazardous Air Pollutants (HAPs) at facilities that conduct **paint stripping and surface spray coating**. The regulation is the *NESHAP for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources* (40 CFR 63, Subpart HHHHHH). This does not apply to facilities that are Major Sources (Title V air permit) for HAP emissions

A facility is covered by the regulation if it conducts any of the following activities:

- Paint stripping with a chemical that contains Methylene Chloride,
- Surface spray coating of motor vehicles and mobile equipment with liquid coatings, or
- **Surface spray coating of miscellaneous metal or plastic parts** with liquid coatings that contain any of the following "target HAPs" above the de minimus levels:

Chromium (VI), Lead, Nickel or Cadmium above 0.1% by weight

Chromium (III) or Manganese above 1.0% by weight

The liquid coating must be spray applied to be subject to the rule. Coating operations that are not covered include: powder coating, use of non-refillable aerosol containers, dip coating, brush coating and roll coating.

Admiral can assist in reviewing the operations and materials used to determine if your facility is subject to the new rule.

If the operation is covered, an Initial Notification must be submitted as soon as possible to the Illinois EPA and U.S. EPA. The regulation also requires employee training, mandatory equipment specifications for the spray booths, booth filters and spray guns, and procedures for spray gun cleaning for covered operations.

If you would like **Admiral** to evaluate your operation to determine the applicability under this regulation, please give me a call. You can also contact me at Todd@Admiralenv.com.

Todd P. Hedlund
Environmental Engineer