

Loss Prevention

Please route to:

- Owner
- General manager
- Sales manager
- Service manager
- Office manager

New National Emission Regulations: Are you in compliance?

In 2010, new regulations controlling air emissions from paint stripping and surface coating operations, referred to as National Emission Standards for Hazardous Air Pollutants (NESHAP), were set forward. These new emission standards held a legal requirement to demonstrate initial and continuous compliance by January 10, 2011. Now several months past the mandatory compliance date, is your business 100% compliant?

If this is the first time you've read anything about NESHAP, you may be wondering if these new emission requirements apply to you. To know for sure, it's time to assess your compliance status.

The "Summary of Regulations Controlling Air Emissions from Paint Stripping and Miscellaneous Surface Coating Operations," published by the Environmental Protection Agency (EPA), shows this regulation applies to area sources that engage in:

- Paint stripping operations that use methylene chloride (MeCl)-containing paint stripping formulations;
- Spray application of coatings to motor vehicles and mobile equipment;
- Spray application of coatings to a plastic and/or metal substrate where the coatings contain compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

Compliance checklist

To help you further assess your status, here are some of the items to consider. Use this compliance checklist to assess your current status:

Submitted Initial Notification Form – Due date January 11, 2010	Yes	No
Completed Notification of Compliance to certify you are in compliance with the applicable requirements – Due date March 11, 2011	Yes	No
Trained/certified all painters on spray gun equipment selection, spray techniques, maintenance and environmental compliance.	Yes	No
Spray booth filters are 98% efficient.	Yes	No
Spray booths and stations used to refinish complete vehicles must be fully enclosed and 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
Spray booths and stations used to coat miscellaneous parts or products or vehicle subassemblies must have a full roof, at least three complete walls or side curtains, and ventilated so that air is drawn into the booth	Yes	No

Spray applied coatings are applied with HVLP (high volume, low pressure) spray guns or equivalent technology	Yes	No
Spray guns are not cleaned by spraying solvent through the gun	Yes	No

Additional resources

The EPA Collision Repair Campaign Website offers great tools and resources to help you get a quick start on the path toward compliance: www.epa.gov/collisionrepair/training.html

While visiting the EPA site, watch the free training video. It reviews NESHAP requirements plus additional best practices, including:

- Vacuum or wet sanding
- Solvent or wipe downs in a ventilated paint booth or prep station
- Low VOC solvents
- Low VOC or water based paints
- Mixing paint in a well ventilated mixing room
- Computerized paint mixing systems
- Storing and re-using left-over primers and basecoats
- All containers shut when not in use
- Designate a health and safety manager
- Establish a respiratory filter change out program
- Have Material Safety Data Sheets available to shop workers
- Follow OSHA guidelines regarding Personal Protective Equipment

Resources on the site include:

Best Practices for auto refinish shops and schools:

www.epa.gov/dfepubs/projects/auto

A Self-Evaluation Checklist of Best Practices for Auto Refinish Shops and Schools:

www.epa.gov/dfepubs/projects/auto/self_eval_checklist.pdf

Auto Refinish Project Best Practices Kit:

www.epa.gov/opptintr/dfepubs/auto/trainers/index.htm

The entire final rule for NESHAP

(40 CFR Part 63, Subpart HHHHHH) can be found at:

www.epa.gov/ttn/atw/area/fr09ja08.pdf

Loss prevention information

For questions about this loss prevention topic, contact the Zurich Risk Engineering Department at 800-821-7803.

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