

## EPA's Paint Rule Summary *Vehicle Refinishing Operations*

The EPA issued their new rule that applies to you if you spray apply coatings to motor vehicles or mobile equipment for the purposes of finishing or refinishing. Existing sources **must comply no later than January 9, 2011.**

### Equipment Compliance

Use this checklist to make sure your equipment complies:

- ✓ All vehicle surface coating operations must apply the coatings with a high volume, low pressure (HVLV) spray gun inside a prep station or spray booth.
- ✓ Prep stations and spray booths that are large enough to hold a complete vehicle must have four complete side walls or curtains and a complete roof.
- ✓ Coatings must be spray applied in a booth with a full roof and at least three walls or side curtains.
- ✓ The exhaust from the prep station or spray booth must be fitted with filters demonstrated to achieve at least 98 percent filter efficiency of paint overspray (i.e., it needs to be a HEPA filter).

Additionally, surface coating sources are required to comply with management practices by demonstrating that:

- (1) All painters have completed training in techniques to minimize paint overspray, and
- (2) That spray guns are cleaned in an enclosed spray gun cleaner or by cleaning the disassembled gun parts by hand.

### Employee Training Compliance

All spray painters at existing sources must complete training no later than three years from the date of this notice (by January 9, 2011) or no later than 180 days after hiring, whichever is later. Painter training must be conducted at least every five years.

Initial and refresher training must address the following topics to reduce coating overspray and emissions and comply with this regulation:

- (1) Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.
- (2) Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.
- (3) Routine spray booth and filter maintenance, including filter selection and installation.

## Reporting

Existing sources must submit an initial notification to their State air pollution control agency no later than one year before their compliance date to indicate whether the source is already in compliance or that it will be brought into compliance by the existing source compliance date.

The initial notification must include the following information:

- (1) The name, address, phone number and e-mail address (if available) of the owner and operator.
- (2) The address (physical location) of the affected source. If the source is a motor vehicle or mobile equipment surface coating operation that repairs vehicles at the customer's location, rather than at a fixed collision repair shop, the notification should state this and indicate the physical location where records are kept to demonstrate compliance.
- (3) A statement that the source is subject to this standard, 40 CFR Part 63.
- (4) A brief description of the type of operation, including which types of activities are performed at the source (miscellaneous surface coating, motor vehicle and mobile equipment surface coating, or paint stripping). For surface coating operations, identify the number of spray booths and the number of painters usually employed at the operation. For paint stripping, identify the method(s) of paint stripping employed (e.g., chemical, mechanical) and the substrates stripped (e.g., wood, plastic, metal).

## Recordkeeping

All sources must keep records sufficient to demonstrate that they are in compliance at all times. These include the following:

- (1) Records that each spray painter has completed the training, with the date of the initial training and the most recent refresher training.
- (2) Documentation of the filter efficiency of any spray booth exhaust filter material, such as data from the filter manufacturer.
- (3) Documentation from the spray gun manufacturer that the spray gun meets the definition of an HVLP spray gun, electrostatic spray gun, airless spray gun, or air-assisted airless spray.
- (4) Copies of any notifications or reports that were submitted.
- (5) Records of any deviation from the requirements in the final rule, including the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation.
- (6) Records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report.

**Call COMPLIANCE CENTRE to schedule an evaluation of your equipment, preparation of the required paperwork and completion of employee training.**