

**EPA's Paint Rule for Motor Vehicle Coating Operations**  
**40 CFR, Part 63, Subpart H**  
***Compliance Deadline - January 9, 2011***

The EPA issued their new rule that applies to anyone who spray applies motor vehicle coatings for the purposes of finishing or refinishing. The rule is intended to reduce air emissions from autobody shops and related facilities in a manner that is not too restrictive or costly for those affected facilities.

**Definition of Spray Applied Coating Operations:** The requirements of this rule apply to all coatings that are applied using a hand-held device that creates a mist of coating and deposits the coating on a substrate, regardless of the location of the activity.

It does not include the following:

- ✗ Coatings applied from a hand-held device with a paint cup capacity equal to or less than 3 fluid ounces.
- ✗ Application of powder coating using hand-held, non-refillable aerosol containers or paint brushers, rollers, hand wiping, flow coating, dip coating or marking pens.
- ✗ Thermal spray operations.

**Summary of Compliance Requirements**

Existing sources must comply no later than January 9, 2011 with the following:

1. ***Train/certify all painters*** on spray gun equipment selection, spray techniques, maintenance and environmental compliance
2. ***Install/operate filter technology*** on all spray booths/stations/enclosures to achieve at least 98% capture efficiency
3. ***Spray booth/stations used to refinish complete motor vehicles must be fully enclosed and ventilated*** at negative pressure or up to .05 inches water gauge positive pressure
4. ***Spray booths/stations used to coat miscellaneous parts must have a full roof, at least three complete walls or side curtains and ventilated*** so that air is drawn into the booth
5. ***Coatings must be applied with a high volume, low pressure spray gun***
6. ***Gun cleaning must be done so that a solvent mist is not created*** outside the container
7. ***Submit notifications to SCDHEC:*** initial notification by January 9, 2010; compliance notification by January 9, 2011; and annual change notifications thereafter
8. ***Maintain records of compliance*** that will be available upon request by SCDHEC

**Call COMPLIANCE CENTRE at 800-257-8199 to schedule an evaluation of your equipment, preparation of the required paperwork and completion of employee training/certification.**

## **Details on the Specific Requirements**

### **1. Employee Training Requirements**

All painters must receive initial training that addresses the following topics to reduce coating overspray and emissions:

- ✓ 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.
- ✓ 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.
- ✓ Routine spray booth and filter maintenance, including filter selection and installation.

Refresher training must be provided at least every five years.

### **2. Spray Booth Exhaust Filter Requirements**

- ✓ The exhaust from the prep station and spray booth must be fitted with filters demonstrated to achieve at least 98% filter efficiency of paint overspray. Documentation of compliance must be kept on file.

### **3. & 4. Prep Station and Spray Booth Requirements**

The new rule requires all spray painting be done in a prep station or spray booth that meets one of the following:

- ✓ Full cars must be painted in a spray booth with four walls, a roof and a ventilation system.
  - 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.
- ✓ Parts of cars must be painted in a booth with at least three walls, a roof and a ventilation system that pulls air into the spray booth.
  - Coatings must be spray applied in a booth with a full roof and at least three walls or side curtains.
- ✓ Spot repairs, including prime application and prep spraying, must be done in an enclosure which prevents any mist from getting out of the enclosure.

### **5. & 6. Paint Gun and Cleaner Requirements**

- ✓ All vehicle surface coating operations must be applied with a high volume, low pressure (HVLP) spray gun inside a prep station or spray booth.
- ✓ Spray guns must be cleaned in an enclosed spray gun cleaner.

### **7. Reporting Requirements**

Existing sources must submit an initial notification to their State air pollution control agency no later than January 9, 2010. A compliance notification must be submitted no later than January 9, 2011 to certify compliance has been achieved with all

requirements of the new rule. The owner/operator must certify both the initial and compliance notifications.

### **8. Recordkeeping**

All sources must keep records sufficient to demonstrate that they are in compliance to include the following:

1. Painter training with names and dates of the initial training and the most recent refresher training
2. Documentation of the filter efficiency of any spray booth exhaust filter
3. Documentation that the spray gun meets the definition of an HVLP spray gun
4. Copies of any notifications that were submitted, including annual change reports
5. Records of any deviation from the requirements in the final rule, including the date, a description of the deviation and the actions taken to correct the deviation