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# Miscellaneous Surface Coating Operations

## 40 Code of Federal Regulations (CFR) Part 63, Subpart HHHHHH (6H)

### Brief Summary of Requirements

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The *National Emission Standards for Hazardous Air Pollutants (NESHAP): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources* regulation (sometimes called “6H”) applies to facilities that spray coatings that contain one or more of the following hazardous air pollutants (HAP) at the listed concentration limits to motor vehicle, mobile equipment, or to other products made of metal, plastic, or a combination of metal and plastic parts.

- **Cadmium (Cd):** Concentration greater than or equal to 0.1 percent-by-mass
- **Chromium (Cr):** Concentration greater than or equal to 0.1 percent-by-mass
- **Lead (Pb):** Concentration greater than or equal to 0.1 percent-by-mass
- **Nickel (Ni):** Concentration greater than or equal to 0.1 percent-by-mass
- **Manganese (Mn):** Concentration greater than or equal to 1.0 percent-by-mass

The metal concentration in coatings can be found on the product’s Material Safety Data Sheets (MSDS), other product data sheets, or by contacting the coating supplier or manufacturer.

The regulations do **not** apply to:

- Surface coating operations that are owned or operated by the U.S. Armed Forces
- Surface coating of military munitions or munitions transportation equipment
- Surface coating of personal vehicles, possessions, or property (no more than two vehicles per year)
- Surface coating that meets the definition of “research and laboratory activities”
- Surface coating that meets the definition of “quality control activities”
- Surface coating operations that are covered under a different area source NESHAP (such as the area source NESHAP for metal fabrication and finishing, 40 CFR, Part 63, Subpart XXXXXX)

Please see the NESHAP for additional information on rule applicability and exemptions at 40 CFR Part 63, Subpart HHHHHH (sections 63.11169 through 63.11180 and Table 1), available at <http://www.epa.gov/ttn/atw/area/compilation.html>. The NESHAP also applies to paint stripping operations that use methylene chloride (MeCl) to remove dried paint from wood, plastic, metal or other substrate. A separate fact sheet summarizing the paint stripping requirements is available at <http://www.iowadnr.gov/air/prof/NESHAP/>.

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## **Information a company should have “on-hand” to help determine whether it is in compliance with the “6H” NESHAP**

- Copy of the Iowa Department of Natural Resource’s *Guide – Miscellaneous Surface Coating Operations at Area Sources*: This guide and other informational materials are available at <http://www.iowadnr.gov/air/prof/NESHAP/>
- Copy of the 6H NESHAP: 40 CFR Part 63, Subpart HHHHHH (sections 63.11169 through 63.11180 and Table 1): The federal regulations are available on EPA’s website at <http://www.epa.gov/ttn/atw/area/compilation.html>
- MSDS or product data sheets for all spray coatings used at the facility
- Paint gun specifications to document use of: HVLP, airless, air-assisted airless, electrostatic, or any other gun shown to be equivalent to HVLP: If the paint gun is not one of the types listed in the 6H NESHAP, a written determination from the Iowa Department of Natural Resources that the paint gun is able to achieve equivalent transfer efficiency
- Filter specifications proving control efficiency of 98%: Filter efficiency data can be obtained from vendors
- Spray booth or enclosure specifications showing that the spray area is:
  - Fully enclosed by four walls and a roof, and equipped with a ventilation system (for complete motor vehicles and equipment)
  - Enclosed by three walls or curtains and a roof, and equipped with a ventilation system that pulls air into the booth (for miscellaneous metal or plastic parts or vehicle subassemblies)
  - Fully surrounded, sealed, and vented through a filter (for spot repairs)
- Certification that each spray technician on staff has completed the training specified in the 6H NESHAP, including the date of the initial training and the most recent refresher training (refresher training must be completed every five years)
- Copies of the facility’s Initial Notification, Notification of Compliance Status, and any Annual Notification of Change Report
- Records of any deviations from the regulations: Records of these deviations must include the date and general time of the deviation, a description of the deviation, and what actions were taken to fix the deviation

**All records must be kept for at least five years. Records may be kept in either printed (hard copy) or electronic form. For the first two years, records must be kept on-site and be readily available for inspection. However, records that are older than two years may be kept off-site at another location for the remainder of the five year period.**

### **Further information or questions contact:**

Iowa Waste Reduction Center: **1-800-422-3109**

Iowa Department of Natural Resources: **1-877-AIR-IOWA**