GUIDE

National Emissions Standard for Hazardous Air Pollutants (NESHAP)

MISCELLANEOUS SURFACE COATING OPERATIONS AT AREA SOURCES IN IOWA

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WHY THIS RULE IS NEEDED

The U.S. Environmental Protection Agency (EPA) and the Iowa Department of Natural Resources (DNR) are required by law to reduce exposure to hazardous air pollutants (HAP), also known as "air toxics." HAP are known or suspected to cause cancer or other serious health effects such as birth defects. Coatings used in automobile and mobile equipment refinishing contain HAP and therefore may pose a risk to public health in the vicinity of the operations, especially in urban areas.

Area Sources. An "Area Source," sometimes called a "minor source" or a "small source," is defined as a facility that emits or has the potential to emit less than 10 tons of any single HAP and less than 25 tons of any combination of HAP per year.

Source Categories. Types of operations identified by EPA as needing regulation are referred to as "source categories." There are 70 area source categories that EPA has identified as needing regulation. Three of these are included in the *National Emission Standards for Hazardous Air Pollutants (NESHAP): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources* [40 Code of Federal Regulations (CFR) Part 63, Subpart HHHHHH], sometimes called "6H" or "6H NESHAP". For brevity, the term "6H NESHAP" is used to refer to this regulation throughout the rest of this document.

- ❖ Paint stripping operations that use methylene chloride (MeCl) to remove dried paint from wood, plastic, metal or other substrates. **NOTE:** This source category is **not** covered in this guide. A separate fact sheet summarizing the paint stripping regulations is available from the DNR upon request.
- ❖ Motor vehicle and mobile equipment spray-applied surface coating operations
- ❖ Miscellaneous surface coating of plastic and metal parts using spray application of coatings containing compounds of chromium (Cr); lead (Pb), manganese (Mn), Nickel (Ni) and Cadmium (Cd).

WHO IS INCLUDED

The 6H NESHAP regulations apply to any operation that does the following:

- Applies surface coatings to motor vehicles and/or roadway use equipment; <u>or</u>
- Sprays liquid coatings on plastic and/or metal substrates (underlying material) which contain the **Target HAP**. For the 6H NESHAP, the Target HAP are compounds of **chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni) and cadmium (Cd)**. Coatings are considered to contain the Target HAP if:
    - The coating contains any individual Target HAP that is an OSHA-defined carcinogen and the concentration is equal to or greater than 0.1 percent by mass; or
    - The coating contains any individual Target HAP that is not an OSHA-defined carcinogen and the concentration is equal to or greater than 1.0 percent by mass. As of May 2009, manganese is the only Target HAP that is not an OSHA-defined carcinogen.

The information on the concentration of a Target HAP in a coating material can be found on the most recent Material Safety Data Sheet (MSDS) or by contacting the coating material manufacturer.

WHO MAY BE EXEMPTED

- Motor vehicle and mobile equipment surface coating operations may petition for exemption if they demonstrate that the coatings sprayed at the facility do **not** contain the Target HAP. An exemption petition form is included in this guide and is also available at http://www.iowadnr.gov/InsideDNR/RegulatoryAir/AirToxics-NESHAP.aspx.
- Miscellaneous surface coating operations that spray liquid coatings on plastic or metal substrates which do **not** contain Target HAP are automatically exempt. No petition for exemption is required. Surface coating operations that coat substrates other than plastic or metal are not subject to this rule.

WHAT IS EXEMPTED

Exempted Coating Operations

- Surface coating performed on site at installations owned or operated by the U.S. Armed Forces, NASA or the National Nuclear Security Administration.
- Surface coating of military munitions manufactured by or for the U.S. Armed Forces or equipment directly and exclusively used for the purposes of transporting military munitions.
- Coating performed by an individual on personal vehicles, possessions, or property, either for hobby/maintenance, provided that no more than two motor vehicles or pieces of mobile equipment are coated per year. This exemption also applies when these operations are performed by individuals for others without compensation.
- Surface coating that meets the definition of “research and laboratory activities” in the 6H NESHAP.
- Surface coating that meets the definition of “quality control activities” in the 6H NESHAP.
- Surface coating activities that are covered under a different NESHAP, such as the area source NESHAP for metal fabrication and finishing (40 CFR Part 63, Subpart XXXXXX).

Exempted Applications

- Spray applied protective oils for metal, bases, or acids (or a combination of these substances)
- Adhesives, sealants, maskants, or caulking materials
- Temporary protective coatings, lubricants, or surface preparation materials
- In-mold coatings spray applied in the manufacture of reinforced plastic composite parts.
- Coatings applied from a hand-held device with a paint cup capacity that is equal to or less than 3.0 fluid ounces.
- Surface coating application using powder coating, hand-held, nonrefillable aerosol containers, or nonatomizing application technology, including, but not limited to, paint brushes, rollers, hand wiping, flow coating, dip coating, electrodeposition coating, web coating, coil coating, touch-up markers, or marking pens.
- Thermal spray operations (also known as metalizing, flame spray, plasma arc spray, and electric arc spray, among other names).

WHAT IS EXEMPTED cont.

Facility Maintenance

Spray coating applications defined as facility maintenance are **not** subject to this rule. Examples of facility maintenance are:

- Surface coating performed as part of the routine repair or renovation of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity.
- Surface coating associated with the installation of new equipment or structures, and the application of any surface coating as part of janitorial activities.
- Application of coatings to stationary structures or their additions at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs.
- The refinishing of mobile equipment in the field or at the site where they are used in service and at which they are intended to remain indefinitely after refinishing. Such mobile equipment includes, but is not limited to, farm equipment and mining equipment for which it is not practical or feasible to move to a dedicated mobile equipment refinishing facility. Such mobile equipment also includes items such as fork trucks, that are used in a manufacturing facility and which are refinished in that same facility.

Not Included as Facility Maintenance

Surface coating of motor vehicles, mobile equipment, or items that routinely leave and return to the facility, such as delivery trucks, rental equipment, or containers used to transport, deliver, distribute, or dispense commercial products to customers, such as compressed gas canisters. ***These activities must be considered for possible 6H NESHAP applicability.***

If your facility or operation does not meet any of the exemptions listed above, please read the rest of this document to learn what is required to comply with the 6H NESHAP.

REQUIREMENTS

This guide is designed to help facilities understand and comply with the requirements in 40 CFR Part 63, Subpart HHHHHH. For specific requirements including the complete federal regulation, refer to: http://www.epa.gov/ttn/atw/area/compilation.html.

Spray Applied Coatings

- All spray-applied coatings must use high-volume low-pressure (HVLP), air-assisted airless, airless, or electrostatic spray guns. An alternative may be used if the spray gun manufacturer demonstrates that it has a transfer efficiency (TE) comparable to the spray guns listed above and written approval has been obtained from the DNR.

REQUIREMENTS cont.

- Painters must be certified once every five years that they have received training on proper spray application, equipment setup and equipment maintenance. Minimal training includes:
    - Hands-on and classroom instruction on spray gun; equipment selection, set up and operation;
    - Training on spray techniques designed to improve transfer efficiency;
    - Training on routine spray booth maintenance and filter selection, installation and maintenance; and
    - Environmental compliance with respect to the 6H NESHAP.
- Facilities may develop their own in-house training program which can be certified by the facility owner. All painting personnel must receive refresher training for recertification every five years.
- All spray areas must be fitted with a filter technology demonstrated to achieve a 98 percent capture efficiency of paint overspray. This requirement does not apply to waterwash spray booths that are operated and maintained according to the manufacturer's specifications.
- All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure.
- Spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, four complete walls or complete side curtains, and be ventilated under negative pressure. However, fully enclosed spray booths equipped with door/opening seals and an automatic pressure balancing system may operate up to 0.05 inches water gauge positive pressure.
- Spray booths and preparation stations used for coating miscellaneous parts or vehicle subassemblies must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so air is drawn into the booth. Booths may have opening for conveyors and parts that pass through the booth for finishing.
- Mobile ventilated enclosures used to perform spot repairs must enclose the surface around the area being coated so overspray is retained in the enclosure and directed to a filter (for overspray capture).
- All spray-gun cleaning must be done so that an atomized mist or spray of cleaning solvent/residual paint is not created outside the container used for collecting the cleaning solvent/residual paint. Spray gun cleaning may be accomplished by hand cleaning, use of an enclosed gun wash unit, or by flushing equipment with solvent (provided the solvent is not atomized outside the container used for solvent collection).

Compliance Dates

Existing Sources:

If your facility has been performing surface coating operations on or before September 17, 2007, your facility is considered an existing source and the compliance date is **January 10, 2011**.

Painter training/certification must be completed within **180 days after hiring** or no later than **January 10, 2011,** whichever is later.

New Sources:

If your facility began surface coating operations after September 17, 2007, it is considered a new source and the compliance date is **January 8, 2008,** or the facility's **initial start-up date,** whichever is later.

Painters must be trained and certified within **180 days after hiring** or no later than **July 7, 2008,** whichever is later.

RECORDKEEPING

Records should be maintained in a form suitable and readily available for expeditious review. Affected facilities must keep the following records to document compliance:

- Training certification records for painters. These records must include the initial training date and the most recent refresher training date for each painter, as well as the hire date of any painter hired after the source's compliance date.
- Filter efficiency documentation demonstrating that filters meet or exceed the 98 percent capture efficiency requirement.
- When the facility uses something other than HVLP, air-assisted airless, airless, or electrostatic application equipment, documentation stating the spray gun has been determined by the DNR to achieve a TE equivalent to an HVLP spray gun.
- Copies of all notifications and reports submitted to the DNR.
- Documentation of any deviations from the requirements and the corrective action taken.

Compliance Summary

- **Use high efficiency spray guns**
- **Train and certify operators**
- **Enclose spraying areas**
- **Capture at least 98 percent of overspray**
- **Capture paint and solvent when cleaning**

AIR CONSTRUCTION PERMITS

The DNR issues air construction permits to ensure that facilities are meeting air quality requirements. Prior to initiating construction, installation, reconstruction or alteration of equipment, a permit is required unless a specific exemption applies [567 Iowa Administrative Code (IAC) 22.1].

- Facilities that spray less than 3 gallons per day facility-wide may use the DNR Permit by Rule (PBR) Notification for all booths at the facility. See the attached PBR Notification form for eligibility requirements (the form is also available at http://www.iowadnr.gov/InsideDNR/RegulatoryAir/AirToxics-NESHAP.aspx).
- Facilities that spray 3 gallons per day or more facility-wide are required to either obtain a construction permit for each booth or show that the facility qualifies for an exemption.
- Facilities located within Polk or Linn counties must obtain the applicable air permits from their local air pollution control agency.

  Polk County Public Works - Air Quality Division
  5885 NE 14th Street; Des Moines, IA 50313
  Phone: 515-286-3705
  Internet: http://www.polkcountyiowa.gov/airquality/

  Linn County Public Health - Air Quality Division
  501 13th Street NW; Cedar Rapids, IA 52405
  Phone 319-892-6000
  Internet: http://www.linncleanair.org/

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The following DNR forms are attached:

- Initial Notification-Notification of Compliance Status-Petition for Exemption
- Notification for Permit by Rule for Spray Booths

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IOWA DEPARTMENT OF NATURAL RESOURCES
AIR QUALITY BUREAU

Initial Notification-
Notification of Compliance Status-Petition for Exemption

Miscellaneous Surface Coating Area Source Rule
40 Code of Federal Regulations (CFR) 63.11169 – 63.11180 (Subpart HHHHHH)

This is a multi-purpose notification form that may be used to fulfill the requirements for 1) Initial Notification; 2) Notification of Compliance Status; or 3)Petition for Exemption. The questions below indicate the information that is required for each type of notification.

1. Facility Information (required for all notifications):

Facility Name:			Facility Number (if known):	
Facility Street Address:		City:	State:	Zip:
Owner's Name and Title:	Owner's phone number:		Owner's email (if available):	
Owner's Mailing Address (if different from facility street address):		City:	State:	Zip:

If the Operator information is different from above, please provide the following:

Operator's Name and Title:	Operator's phone number:		Operator's email (if available):	
Operator's Street Address (if different from facility street address):		City:	State:	Zip:

Is the facility a motor vehicle or mobile equipment surface coating operation that repairs vehicles at the customer's location, rather than at a fixed location? Yes ☐ No ☐

2. Identification of Standard (required for all notifications):

☐ Yes, this facility is subject to 40 CFR Part 63, Subpart HHHHHH, *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources* (6H NESHAP), because this facility fits one of the following descriptions:

- An area source surface coating operation that coats metal and/or plastic products, motor vehicles, or mobile equipment is subject to the 6H NESHAP if the operation uses coatings that contain the Target HAP (lead, chromium, nickel, cadmium, manganese).
- An area source motor vehicle or mobile equipment surface coating operation that does **not** use the Target HAP is considered subject to the 6H NESHAP until an exemption request has been approved by the DNR. This notification form may be used as an exemption request. ***If your source is in this category, you may skip ahead to the "Responsible Official Certification" section.***
- An area source metal and/or plastic products surface coating operation that does **not** use the Target HAP is exempt from the 6H NESHAP. ***If your source is in this category, you do not need to complete this notification.***

3. Brief description of the operation (required for Initial Notification and Notification of Compliance Status):

a. This facility has a (check all that apply):

- ☐ Motor Vehicle or Mobile Equipment Surface Coating Operation
- ☐ Miscellaneous Surface Coating Operation

b. Number of spray booths: _____

c. Number of preparation stations: _____

d. Number of painters usually employed: _____

4. Compliance Status, please check one (required for Initial Notification):

For surface coating operations, the relevant requirements are specified in the 6H NESHAP, 40 CFR 63.11173(e) through (g). The main compliance elements for this standards are: operator training (repeated every five years), HVLP or equivalent spray guns, enclosed spray area, 98% efficient filters, and non-atomized spray gun cleaning.

☐ This facility is already **in compliance** with each of the relevant requirements.

☐ This facility **will be in compliance** with each of the relevant requirements by the compliance date.

- **New Source** (after September 17, 2007, but before January 9, 2008): compliance date is **January 9, 2008**
- **New Source** (after Jan 9, 2008): compliance date is **date of startup**
- **Existing source** (before September 17, 2007): compliance date is **January 10, 2011**

☐ I plan to **change operations** at this facility prior to January 10, 2011, to **avoid being subject** to this rule.

NOTE: New facilities must submit the Initial Notification within 180 days of startup. Existing facilities must submit the Initial Notification by January 11, 2010.

5. Certification of Compliance Status, please check one (required for Notification of Compliance Status):

☐ This facility is a **new source** (initial startup was on or after September 17, 2007). Startup Date: _____

- If the source is a new source, a responsible official must certify below that the source is in compliance with each of the relevant requirements of the 6H NESHAP. *NOTE: New facilities must submit the Notification of Compliance Status within 180 days of start-up.*

☐ This facility is an **existing source** (initial startup was before September 17, 2007). Startup Date: _____

- If the source is an existing source, a responsible official may certify below that the source is already in compliance with each of the relevant requirements of the 6H NESHAP, or submit a separate certification no later than March 11, 2011, as specified in 40 CFR Section 63.11175(b). Please check one:
  - ☐ I am **certifying compliance** below.
  - ☐ I will submit the Notification of Compliance Status by **March 11, 2011,** or provide certification that I'm no longer subject to the rule.

Responsible Official Certification (check all that apply)	
☐	**I certify the truth, accuracy, and completeness of this notification.**
☐	**The source is a motor vehicle and mobile equipment surface coating operation, but does not use the Target HAP. With this certification, the facility is requesting an exemption from the 6H NESHAP.**
☐	**The source has complied with all the relevant standards of the 6H NESHAP. This notification also serves as the Notification of Compliance Status.**

Responsible Official Name	Responsible Official Signature	Date

Submit this notification to the following agency(ies):

- Iowa Department of Natural Resources, NESHAP Coordinator, 7900 Hickman, Suite 1; Windsor Heights, IA, 50324
- If the facility is located in either Linn County or Polk County, this notification shall also be submitted to the appropriate county office:

Polk County Public Works – Air Quality Division
5885 NE 14th Street; Des Moines, IA 50313

Linn County Public Health - Air Quality Division
501 13th Street NW; Cedar Rapids, IA 52405

IOWA DEPARTMENT OF NATURAL RESOURCES
AIR QUALITY BUREAU

NOTIFICATION LETTER FOR
PERMIT BY RULE FOR SPRAY BOOTHS

To be eligible for a permit by rule for spray booths, a facility must meet all applicable requirements established in 567 Iowa Administrative Code (IAC) subrule 22.8(1) **and** must certify that the facility currently is or will be in compliance with or otherwise exempt from the requirements of National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Surface Coating Operations at Area Sources (40 CFR Part 63, Subpart HHHHHH) and the NESHAP for Metal Fabrication and Finishing at Area Sources (40 CFR Part 63, Subpart XXXXXX) by the applicable NESHAP compliance dates. The owner or operator shall complete this form and submit **one (1) original** to: Iowa DNR, Air Quality Bureau, 7900 Hickman Road, Suite 1, Windsor Heights, Iowa, 50324.

Retain a copy of the completed form for your records.
The permit becomes effective upon the DNR's receipt of this notification letter.

Section 1 – Facility Information

Print in ink or type			For DNR Use Only Field Office Facility ID
Name of Firm/Company	Facility Name (if different)		
Mailing Address -Street/PO Box	City	State	Zip
Equipment Location - Street	City	State	Zip
Person to Contact	Phone Number	Fax Number	

Section 2 - Applicability

Please complete the seven applicability questions below unless otherwise directed. A facility that is not eligible to use this form must apply for a construction permit as specified under 567 IAC subrules 22.1(1) and 22.1(3) unless otherwise exempt from the requirement to obtain a construction permit.

1. What is the facility-wide spray material use ***per day***? (check one)

☐ One gallon per day or less (must record amount of paint used each day per 22.8(1)"b")
☐ More than one gallon per day but less than three gallons per day (spray booth must be vented with a stack which is at least 22 feet tall, as measured from the ground and must record amount of paint used each day per 22.8(1)"c")
☐ Three gallons or more per day (**not eligible** for Permit by Rule for Spray Booths)

2. The spray booth(s) at the facility will spray paint or coatings on what type of materials? (check **all** that apply)

☐ Motor vehicles or mobile equipment (e.g. any device that may be drawn or driven on a roadway)
☐ Plastic or metal parts and products
☐ Wood or other substrates not metal or plastic

Section 2 – Applicability (continued)

3. Is the *primary*[1] activity of your facility in one of the following nine metal fabrication and finishing source categories? Autobody shops are currently not included in any of the nine listed metal fabrication and finishing source categories. **Check all that apply below and proceed to question 5. If none of the categories below apply to your facility, check "none" below and proceed to question 4.**

☐ Electrical and Electronic Equipment Finishing Operations (including motor and generator manufacturing, and electrical machinery, equipment, and supplies, not elsewhere classified) [SIC codes 3621 or 3699];

☐ Fabricated Metal Products, not elsewhere classified [SIC code 3499];

☐ Fabricated Plate Work (Boiler Shops) [SIC code 3443];

☐ Fabricated Structural Metal Manufacturing [SIC code 3441];

☐ Heating Equipment, except Electric [SIC code 3433];

☐ Industrial Machinery and Equipment Finishing Operations (including construction machinery manufacturing; oil and gas field machinery manufacturing; and pumps and pumping equipment manufacturing) [SIC codes 3531, 3533 or 3561];

☐ Iron and Steel Forging [SIC code 3462];

☐ Primary Metal Products Manufacturing [SIC code 3399];

☐ Valves and Pipe Fittings, not elsewhere classified [SIC code 3494].

☐ **None** (proceed to question 4)

4. Are the operations at your facility specifically exempt from NESHAP Subpart HHHHHH - Miscellaneous Surface Coating Operations at Area Sources? A complete list of exemptions is included in 40 CFR Section 63.1169(d). **Check all exemptions that apply *and* skip to Section 3. If none of the exemptions listed below apply, check "no" and go to question 6.**

☐ Surface coating is performed **only** on wood, leather, rubber, ceramics, stone, masonry or substrates other than metal or plastic.

☐ Coatings applied consist **only** of adhesives, sealants, maskants, caulking materials or decorative, protective or functional materials that consist only of protective oils for metal, acids or bases.

☐ Surface coating performed on site at installations owned or operated by the US Armed Forces, NASA or the National Nuclear Security Administration.

☐ Surface coating of military munitions, as defined in §63.11180, manufactured by or for the US Armed Forces or equipment directly and exclusively used for the purposes of transporting military munitions.

☐ Coating performed by an individual on their possessions (not including motor vehicles or mobile equipment), either for hobby or maintenance.

☐ Coating performed by an individual on others' possessions (not including motor vehicles or mobile equipment), either for hobby or maintenance for which no compensation is received.

☐ Coating performed by an individual on personal or others' motor vehicles or mobile equipment as long as no more than two vehicles or pieces of mobile equipment are coated per year.

☐ Surface coating that meets the definition of "research and laboratory activities" in §63.11180.

☐ Surface coating that meets the definition of "quality control activities" in §63.11180.

☐ Surface coating activities that are covered under another area source NESHAP.

☐ **No** (proceed to question 6)

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[1] Many facilities perform these metal fabrication and finishing processes but are not subject to NESHAP Subpart XXXXXX unless they are "primarily engaged" in operations which are classified in one of the listed nine source categories. To check if you are subject, check your SIC code(s) with the SIC codes that are subject to this rule and listed above. A more detailed description of the affected source categories is included in the text of the rule at http://www.epa.gov/ttn/atw/area/compilation.html.

Section 2 – Applicability (continued)

5. Are **all** of the operations at your facility specifically exempt from NESHAP Subpart XXXXXX – Metal Fabrication and Finishing Operations? A complete list of exemptions is included in 40 CFR Section 63.11514. **Check all exemptions that apply *and* skip to Section 3. If none of the exemptions listed below apply to all operations at your facility, check "no" and go to question 6.**

☐ Surface coating performed at research or laboratory facilities as defined in section 112(c)(7) of the CAA.

☐ Surface coating performed at tool or equipment repair operations, for facility maintenance or for quality control as defined in §63.11522.

☐ Surface coating performed on site at installations owned or operated by the US Armed Forces, NASA or the National Nuclear Security Administration.

☐ Surface coating of military munitions, as defined in §63.11522, manufactured by or for the US Armed Forces or equipment directly and exclusively used for the purposes of transporting military munitions.

☐ **No** (proceed to question 6)

6. Do the paint or coatings spray applied in your booth(s) contain[2] **Cadmium**, **Chromium**, **Lead**, **Manganese** or **Nickel**?

☐ **Yes** (proceed to question 7)

☐ **No**. The spray booth(s) is not subject to the requirements of 40 CFR Part 63, Subpart HHHHHH or Subpart XXXXXX. (skip to Section 3)

7. Which Area Source NESHAP applies to your surface coating operation? (the spray booth(s) at the facility cannot be subject to both NESHAP.)

☐ 40 CFR Part 63, Subpart HHHHHH[3] The spray booth(s) are subject to the requirements of 40 CFR Part 63, Subpart HHHHHH if you checked "**none**" in question 3, if you checked "**no**" in question 4 and you if answered **"yes"** to question 6.

☐ 40 CFR Part 63, Subpart XXXXXX[4] The spray booth(s) are subject to the requirements of 40 CFR Part 63, Subpart XXXXXX if you checked **any category (besides "none")** in question 3, if you checked "**no**" in question 5 and you answered **"yes"** to question 6.

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[2] In order for a coating or paint to contain these compounds as defined under the NESHAP, the compounds must be present in concentrations equal to or greater than 0.1 percent by mass for Cadmium, Chromium, Lead and Nickel or be present in concentrations equal to or greater than 1.0 percent by mass for Manganese. Refer to product MSDS, Manufacturer's Product Specification Sheet, or contact the coating or paint manufacturer directly to determine if the coating or paint contain any of the compounds at the defined concentrations.

[3] Please refer to the full rule text of 40 CFR Part 63, Subpart HHHHHH available at http://www.epa.gov/ttn/atw/area/compilation.html to determine all applicable equipment requirements, management practices, monitoring requirements, recordkeeping requirements and reporting requirements necessary to be in compliance with this rule. The DNR has also developed a guide to the NESHAP for Miscellaneous Surface Coating Operations at Area Sources. This guide is available on our website at http://www.iowadnr.gov/air/prof/NESHAP/.

[4] Please refer to the full rule text of 40 CFR Part 63, Subpart XXXXXX available at http://www.epa.gov/ttn/atw/area/compilation.html to determine all applicable equipment requirements, management practices, monitoring requirements, recordkeeping requirements and reporting requirements necessary to be in compliance with this rule. NESHAP Subpart XXXXXX applies not only to spray booths, but also to dry abrasive blasting, machining, dry grinding and polishing with machines and welding. If a facility that is primarily engaged in one of the nine metal fabrication and finishing operations listed in question 3 also performs any other of these industrial processes, it is possible that these other operations are subject to NESHAP Subpart XXXXXX. Each industrial process is regulated only if they use materials that contain or have the potential to emit the compounds listed in question 6. Any operations other than spray booths subject to the requirements of NESHAP Subpart XXXXXX may be required to obtain a construction permit unless otherwise exempt. The DNR has also developed a summary of requirements for this rule for each industrial process. These documents

are available on our website at http://www.iowadnr.gov/air/prof/NESHAP/.

Section 3 – Spray Booth Description

Please provide the following details for each of the paint booths at your facility. If additional space is needed, please attach a separate sheet.

LIST ALL SPRAY BOOTHS AT THE FACILITY:

	Spray Booth ID #	Booth Type	Location
Ex.	*Spray booth 1*	*Cross-draft automotive*	*N.E. Corner of building A*
1			
2			
3			
4			
5			
6			
7			
8			

Continue on Page 5 ⇨

Section 4 – Certifications (PLEASE READ CAREFULLY)

SPRAY BOOTH CERTIFICATION: All facilities must complete this certification and sign below.

☐ *"I certify that all spray booths at the facility and listed in Section 3 are in compliance with all applicable requirements of rule 567 IAC 22.8(1)(455B). I understand that this equipment shall be deemed permitted under the terms of 567 IAC 22.8(1)(455B) only if all applicable requirements of 567 IAC 22.8(1)(455B) are met. This certification is based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete."*

SPRAY MATERIAL CERTIFICATION: Only facilities that answered "none" in question 3 *and* "no" in question 6, **or** answered question 7 must complete one of these certifications and sign below. ***Answer box 1 or 2, as applicable, not both.***

1. ☐ *"I certify that none of the coatings used in my motor vehicle or mobile equipment spray booth contain Cadmium, Chromium, Lead, Manganese or Nickel. I understand that if circumstances change, such that I intend to spray apply coatings containing these materials, I shall comply with the requirements of the NESHAP for Miscellaneous Surface Coating (40 CFR Part 63, Subpart HHHHHH) and submit the initial notification required by §63.11175."*

I intend to use the following types of coatings in my motor vehicle or mobile equipment spray booth:
(for example: polyurethane coatings) _____

OR

2. ☐ *"I certify that I am subject to 40 CFR Part 63, Subpart HHHHHH or Subpart XXXXXX, as specified in this form. I understand that I must submit all subsequent notifications and reports as required by the applicable NESHAP. I further certify that in regards to Subpart HHHHHH and Subpart XXXXXX the facility:*

☐ *Currently is/will be in compliance with 40 CFR Part 63, Subpart HHHHHH or Subpart XXXXXX by the applicable NESHAP compliance dates.*

or

☐ *I plan to be exempt from 40 CFR Part 63, Subpart HHHHHH or Subpart XXXXXX by the applicable NESHAP compliance dates. I understand that if circumstances change, such that I am not longer exempt, I shall comply with the requirements of the 40 CFR Part 63, Subpart HHHHH or Subpart XXXXXX and submit the initial notification required by §63.11175 or §63.11519. If I spray apply coatings to motor vehicles or mobile equipment, I understand that I must petition for an exemption if I no longer spray apply coatings that contain Cadmium, Chromium, Lead, Manganese or Nickel.*

Signature	Title	Date

Print Name

567—22.8(455B) Permit by rule.

22.8(1) *Permit by rule for spray booths.* Spray booths which comply with the requirements contained in this rule will be deemed to be in compliance with the requirements to obtain an air construction permit and an air operating permit. Spray booths which comply with this rule will be considered to have federally enforceable limits so that their potential emissions are less than the major source limits for regulated air pollutants and hazardous air pollutants as defined in 567—22.100(455B).

a. Definition. "Sprayed material" is material sprayed from spray equipment when used in the surface coating process in the spray booth, including but not limited to paint, solvents, and mixtures of paint and solvents.

b. Facilities which facility-wide spray one gallon per day or less of sprayed material are exempt from all other requirements in 567—Chapter 22, except that they must submit the certification in 22.8(1)*"e"* to the department and keep records of daily sprayed material use. The owner or operator must keep the records of daily sprayed material use for 18 months from the date to which the records apply. The owner or operator must also certify that the facility is in compliance with or otherwise exempt from the federal regulations specified in 22.8(1)*"e."*

c. Facilities which facility-wide spray more than one gallon per day but never more than three gallons per day are exempt from all other requirements in 567—Chapter 22, except that they must submit the certification in 22.8(1)*"e"* to the department, keep records of daily sprayed material use, and vent emissions from a spray booth(s) through a stack(s) which is at least 22 feet tall, measured from ground level. The owner or operator must keep the records of daily sprayed material use for 18 months from the date to which the records apply. The owner or operator must also certify that the facility is in compliance with or otherwise exempt from the federal regulations specified in 22.8(1)*"e."*

d. Facilities which facility-wide spray more than three gallons per day are not eligible to use the permit by rule for spray booths and must apply for a construction permit as required by subrules 22.1(1) and 22.1(3) unless otherwise exempt.

e. Notification letter.

(1) Facilities which claim to be permitted by provisions of this rule must submit to the department a written notification letter, on forms provided by the department, certifying that the facility meets the following conditions:

1. All paint booths and associated equipment are in compliance with the provisions of subrule 22.8(1);
2. All paint booths and associated equipment are in compliance with all applicable requirements including, but not limited to, the allowable particulate emission rate for painting and surface coating operations of 0.01 gr/scf of exhaust gas as specified in 567—subrule 23.4(13); and
3. All paint booths and associated equipment currently are or will be in compliance with or otherwise exempt from the national emissions standards for hazardous air pollutants (NESHAP) for paint stripping and miscellaneous surface coating at area sources (40 CFR Part 63, Subpart HHHHHH) and the NESHAP for metal fabricating and finishing at area sources (40 CFR Part 63, Subpart XXXXXX) by the applicable NESHAP compliance dates.

(2) The certification must be signed by one of the following individuals.

1. For corporations, a principal executive officer of at least the level of vice president, or a responsible official as defined at 567 IAC 22.100(455B).
2. For partnerships, a general partner.
3. For sole proprietorships, the proprietor.
4. For municipal, state, county, or other public facilities, the principal executive officer or the ranking elected official.