

Initial Notification/Compliance Form

40 CFR Part 63.11175- 63.11176 (Subpart HHHHHH)

Paint Stripping and Miscellaneous Surface Coating Operations at an Area Source

Mecklenburg County Air Quality (MCAQ)

General Instructions:

These instructions apply to the Initial Notification form and the Compliance Certification form for the Paint Stripping and Miscellaneous Surface Coating Operations facilities subject to Subpart HHHHHH, 40 CFR Part 63.11169 – 63.11180.

Paint Stripping Operations are those that perform paint stripping using methylene chloride (MeCl) for the removal of dried coating (including, but not limited to, paint, enamel, varnish, shellac, and lacquer) from wood, metal, and plastic.

Motor Vehicle/Mobile Equipment involves the spray application of coatings/paint at area sources to automobiles, light trucks, heavy duty trucks, buses, construction equipment, self-propelled vehicles and equipment that may be drawn and/or driven on a road. An **Area Source** is a source of hazardous air pollutants (HAP) that is not a major source of HAP, is not located at a major source, and is not part of a major source of HAP emissions. A major source of HAP emissions is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 10 tons or more per year, or emit any combination of HAP at a rate 25 tons or more per year.

Miscellaneous Surface Coating Operations involve the spray application of coatings that contain compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd) (collectively referred to as target HAPs) to miscellaneous parts and or products made of metal or plastic, or combination of both". You can obtain a copy of the rule at <https://www.epa.gov/stationary-sources-air-pollution/paint-stripping-and-miscellaneous-surface-coating-operations> for more information.

Please provide complete responses to all questions on the applicable forms attached. If you need assistance, please contact Mecklenburg County Air Quality at (704) 336-5430.

- 1. Facility Information:** [40 CFR 63.11175(a)(1) and (3)]. Enter the company name, physical address and mailing address, phone and fax number(s) of the legal entity, which owns or operates the facility.
- 2. Owner/Operator Contact Information:** [40 CFR 63.11175(a)(2)]. Provide the owner or operator name(s), title, mailing address, phone and fax number(s), and e-mail. If the owner and operator are the same person, or if a certifying official is a different, please provide the information.
- 3. Paint Stripping Operations:** [40 CFR 63.11175(5)(ii) and (6)].
 - (a)** Please check all applicable boxes. In "Methods of paint stripping employed", select the method(s) that describe your operations.
 - (b)** In "Substrates stripped", select the type(s) of surface(s) that will be stripped.
 - (c)(d)** For the use of MeCl, select the appropriate Yes/No boxes based on actual or projected data.
- 4. Surface Coating Operations:** [40 CFR 63.11175(5)(i)].
 - (a)(b)** Please select the type of surface coating operation that applies to your business.
 - (c)** Indicate the number of spray coating/painting booths at the facility.
 - (d)** Indicate the number of preparation stations the facility.
 - (e)** Indicate the number of clean up stations your facility has.
 - (f)** Indicate the number of painters the facility has.
 - (g)** Select the appropriate Yes/No boxes; for this type of operation, the "Facility Information" in Section 1. above must be the physical location where the records are kept to demonstrate compliance with the rule.
 - (h)** Use the container(s) label(s) or the SDS(s) provided by vendors or suppliers to provide data on the products.
- 5. Notification of Compliance:** [40 CFR 63.11175(b)]. Indicate whether the facility is new, or reconstructed, or an existing source. This section specifies the notification and compliance requirements based on the facility status.
- 6. Type of Notification:** [40 CFR 63.11175]. Please select the applicable box(es). Check "Initial Notification" if this is the facility's first response under the rule. [40 CFR 63.11175(b)] If, after reviewing all of the requirements of the regulation, the facility determines it is currently in compliance, check "Compliance Certification Notification" to request to certify compliance.

7. **Certification Statement:** [40 CFR 63.11175(7) and (8)]. Please select the box(es) appropriate to your operations.
Signature Requirements: [40 CFR 63.11175(8)]. This notification is required to be signed by the owner/operator or certifying official.
8. **Not subject to the Rule Statement:** If your facility is not subject to the rule, please check the box and sign the statement.

Please return the completed form to the mailing address provided in Section 9.

Initial Notification/Compliance Certification Form
40 CFR Part 63.11169 – 63.11180
Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources
Subpart HHHHHH

1. Facility Information (please print)

Company Name:

Physical Address:

Street Address:

City:

State:

ZIP Code:

Mailing Address (if different than above):

Street Address:

City:

State:

ZIP Code:

Phone Number:

Fax Number:

2. Owner/Operator Contact Information (please print)

Name:

Title:

Street Address:

City:

State:

ZIP Code:

Phone Number:

Email:

If the Certifying Official is different than above, please provide the information below for that person:

Name:

Title:

Phone Number:

Email:

3. Does this source perform any paint stripping operations? **Yes** **No** (If No, skip to 4.)

a. Methods of paint stripping employed (check all that apply):

Chemical

Mechanical

Other (please describe):

b. Substrates stripped (check all that apply):

Wood

Plastic

Metal

Other (please describe):

c. Is **methylene chloride** (MeCl) one of the chemical components of the paint stripper that you are using?
(Refer to the container label or SDS for content information.) Yes No (If No, skip to 4.)

d. Do you plan to use more than 1 ton of MeCl annually? Yes No

(based on actual or projected annual usage of materials identified in 3.c above)

If you answered "YES" to question 3 and 3.c. above, you are subject to the Subpart HHHHHH rule; please continue to complete the Initial Notification/Compliance Certification form with Questions 4, 5, 6, and 7 below.

4. Does this source perform any surface coating/painting operations as specified in 4.a. or 4.b. below? Yes No

If "Yes" above, provide the following information:

- a. Automobile, Motor Vehicle or Mobile Equipment Surface Coating/Painting Operation
- b. Miscellaneous Surface Coating/Painting Operation
- c. Number of spray booths:
- d. Number of preparation stations:
- e. Number of painters usually employed:
- f. Is your business 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
- g. Do any of the paints/coatings used in spray application contain one of the following metals; cadmium (Cd), chromium (Cr), manganese (Mn), nickel (Ni), or lead (Pb)? (*Refer to the container label, manufacturer's data, or SDS for content information*) Yes No
- h. Use the container(s) label(s) or the SDS(s) provided by vendors or suppliers to provide data on the products.

If you answered "YES" to question 4 and checked 4.a. above, you are subject to the Subpart HHHHHH rule; complete Sections 5, 6, and 7 below and sign the Certification Statement in Section 7. **However,** you may petition MCAQ for an exemption from Subpart HHHHHH if you can demonstrate to the satisfaction of the MCAQ Director that you spray apply no coatings with the metals (target HAPs) listed above in 4.g. Petitions must include a description of the coatings that you spray apply and your certification that you do not spray apply any coatings containing the target HAPs. Contact Mecklenburg County Air Quality at (704) 336-5430 for more information.

If you answered "Yes" to question 4, checked 4.b., and answered "Yes" to 4.g. above, you are subject to the Subpart HHHHHH rule; complete Sections 5, 6, and 7 below and sign the Certification Statement in Section 7.

If you determine you are not subject to Subpart HHHHHH under Section 3 and 4 above, no additional information is needed. Please indicate that your facility is not subject to the rule in Section 8, and sign the form where indicated.

5. Is your facility a new or reconstructed or an existing source?

If you are an **existing source** (initial start-up of operations **on or before** September 17, 2007), please submit this initial notification to MCAQ by **November 30, 2009**. You are also required to submit a Compliance Certification to MCAQ by **March 11, 2011**. If you are in compliance when this Initial Notification is submitted, you may certify compliance on this form at the same time (see the Certification Statement below).

If you are a **new or reconstructed source**¹ (initial start-up of operations **after** September 17, 2007) and have not certified compliance through this Initial Notification, then you must submit a Compliance Certification Notification within **180 days after initial start up, or within 180 days after January 9, 2008 (which is July 7, 2008), whichever is later.**

I am a new or reconstructed source

I am an existing source

¹ 40 CFR 63.11171 (c)(1) (2):

(c) An affected source is a new source if it meets the criteria in paragraphs (c)(1) and (c)(2) of this section. (c)(1) You commenced the construction of the source after September 17, 2007 by installing new paint stripping or surface coating equipment. If you purchase and install spray booths, enclosed spray gun cleaners, paint stripping equipment to reduce MeCl emissions, or purchase new spray guns to comply with this subpart at an existing source, these actions would not make your existing source a new source. (c)(2) The new paint stripping or surface coating equipment is used at a source that was not actively engaged in paint stripping and/or miscellaneous surface coating prior to September 17, 2007.

(d) An affected source is reconstructed if it meets the definition of reconstruction in 40 CFR 63.2.

(e) An affected source is an existing source if it is not a new source or a reconstructed source.

Please specify whether the facility is a new or existing source, based on the initial start-up date of the facility (check only one box). Initial start-up is defined as the first time that equipment is brought online in a paint stripping or surface coating operation, and paint stripping or surface coating is first performed.

6. Type of Notification (check all that apply):

Initial Notification

Compliance Certification Notification

(If, after reviewing all of the requirements of the regulation, the facility determines it is currently in compliance, the facility may request to certify compliance).

----- OR -----

Annual Change Notification

(Select if you are making reportable changes to the past calendar year Compliance Notification. Note: this report must be submitted prior to March 1 following each calendar year in which a change occurred).

7. Certification Statement (check all that apply):

This facility is subject to 40 CFR Part 63 Subpart HHHHHH (A response is also required to one of the two statements below regarding facility compliance with Subpart HHHHHH).

This facility is in compliance with each of the relevant requirements of 40 CFR Part 63 Subpart HHHHHH; or

For an existing source only, this facility will be brought into compliance with each of the relevant requirements of 40 CFR Part 63 Subpart HHHHHH, and we will submit a compliance certification by the compliance date of March 11, 2011. (Note: This option is not available to a new or reconstructed source, which must be in compliance on initial start-up).

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature of Owner or operator

Date

Name (Print)

Title

8. Not Subject to the Rule Statement

This facility is not subject to 40 CFR Part 63 Subpart HHHHHH.

Signature of Owner or operator

Date

Name (Print)

Title

9. Where to Mail This Form

Return this form to Mecklenburg County Air Quality at the following address:

**Mecklenburg County Air Quality
Attention: Subpart 6H Initial Notification
2145 Suttle Avenue
Charlotte, NC 28208-5237**

It is recommended that this form be sent by certified mail with a return receipt so that you will have a record that this form was submitted to the regulatory authority.