



**Lincoln-Lancaster County Health Department**

Air Quality Program  
3140 N Street  
Lincoln, NE 68510

<b>Date Received</b>
LLCHD use only

**INITIAL NOTIFICATION / NOTIFICATION OF COMPLIANCE STATUS FORM**

**Applicable Rule:** 40 CFR Part 63 – Subpart HHHHHH: National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Facilities

**Who is subject to this rule?**

In order to be subject to this rule, a facility must meet the following criteria:

1. The facility is engaged in one of the operations listed in Section 2, and is an area source of hazardous air pollutants (HAP) (i.e. the entire facility has the potential to emit <10 tons per year (tpy) of a single HAP or <25 tpy of a combination of HAP).
2. The surface coating facility uses or has emissions of compounds of one or more surface coating metal HAP, which means any compound of any of the following metals: Cadmium (Cd), Chromium (Cr), Lead (Pb), Manganese (Mn), and Nickel (Ni).
3. The facility utilizes Methylene Chloride (MeCl) to perform paint stripping. Paint can include, but is not limited to, paint, enamel, varnish, shellac, and lacquer.

A copy of the applicable rule, mentioned above, can be found at the following link:

<http://www.epa.gov/ttn/atw/area/fr09ja08.pdf>

**SECTION 1 – General Information**

*Print or type the following information for each facility for which you are making an initial notification and/or notification of compliance status. If you would like to obtain an electronic copy of this document in MS Word format, download a copy at the following address:*

[www.lincoln.ne.gov/city/health/environ/pollu/airforms.htm](http://www.lincoln.ne.gov/city/health/environ/pollu/airforms.htm)

1. Facility Identification Number (optional): \_\_\_\_\_ NAICS Code: \_\_\_\_\_

2. Responsible Official's Name & Title: \_\_\_\_\_

3. Responsible Official's Phone Number: (\_\_\_\_) \_\_\_\_\_ - \_\_\_\_\_

4. Responsible Official's Address: \_\_\_\_\_  
Street City State ZIP

5. Facility Name: \_\_\_\_\_

Address: \_\_\_\_\_  
Street City State ZIP

Has your facility already completed the 'Initial Notification'?  Yes  No

- If Yes, skip pages 2 through 4, and return completed pages 1 and 5 through 7, to the addresses shown at the top of page 2.

This Initial Notification must be completed, signed, and submitted to the Lincoln-Lancaster County Health Department along with a cover letter signed by a responsible official certifying that the information contained herein is true, accurate, and complete. If your facility started operation on, or prior to September 17, 2007, the Initial Notification is due no later than January 11, 2010. If your facility started operation after September 17, 2007, but prior to January 10, 2008, then the notification was due July 7, 2008. If your facility starts operation on or after January 10, 2008, the initial notification is due within 180 days of start-up. If you intend to use this form as your Notification of Compliance Status, refer to the directions on the following page. Copies of this notification shall be sent to:

**Lincoln-Lancaster County Health Department**  
Attn: Gary Walsh  
3140 N Street  
Lincoln, NE 68510

and

**EPA Region VII**  
Attn: Chief, APCO  
901 N. 5<sup>th</sup> Street  
Kansas City, KS 66101-2907

If you have any questions, or require assistance in completing this form, please call the LLHCD Air Pollution Control Program at (402) 441-8040.

## **SECTION 2 – Applicability Determination**

**NOTE:** For more information on affected and exempted sources, refer to the Subpart 6H 'FACT SHEET'

**In the appropriate box(es) provided below, check those that correspond to the activities in which your source is engaged. You are subject to this rule if you are engaged in any of the following:**

- Paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), Chemical Abstract Service (CAS) number 75092, in paint removal processes**
- Auto-body refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations**
- Spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment**
- Check this box if you are not engaged in any of the operations listed above. If you check this box, you may skip the remainder of this form, and return pages 1-4 of the completed form to the Lincoln-Lancaster County Health Department at the address given above. You must document and retain your rationale for this determination pursuant to 63 CFR Part 63.10 paragraph (b)(3).**

**Important Note:** Subpart HHHHHH does not apply to any of the following activities.

- Surface coating or paint stripping performed on site at installations owned or operated by the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State), the National Aeronautics and Space Administration, or the National Nuclear Security Administration.
- Surface coating or paint stripping of military munitions, as defined in §63.11180, manufactured by or for the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State) or equipment directly and exclusively used for the purposes of transporting military munitions.
- Surface coating or paint stripping performed by individuals on their personal vehicles, possessions, or property, either as a hobby or for maintenance of their personal vehicles, possessions, or property. This subpart also does not apply when these operations are performed by individuals for others without compensation. An individual who spray applies surface coating to more than two motor vehicles or pieces of mobile equipment per year is subject to the requirements in this subpart that pertain to motor vehicle and mobile equipment surface coating regardless of whether compensation is received.
- Surface coating or paint stripping that meets the definition of "research and laboratory activities" in §63.11180.
- Surface coating or paint stripping that meets the definition of "quality control activities" in §63.11180.
- Surface coating or paint stripping activities that are covered under another area source NESHAP.

**Briefly describe the source in the space provided below.** (A labeled diagram of your facility identifying the affected operations indicated on the following page is acceptable.)

### **SECTION 3 – Identification of Affected Operations**

The following are the operations at this facility that are subject to Subpart HHHHHH. Only list those operations where materials containing Methylene Chloride (MeCl), or any of the 5 previously mentioned metal HAPs are used/emitted. Refer to point #2 under "Who is subject to this rule?" on page 1 of this form to identify the 5 metal HAPs.

Is Methylene Chloride paint<sup>(1)</sup> stripping conducted at your facility?

Yes     No

If you answered 'Yes', check the box next to the substrates upon which MeCl stripping is performed:

Wood

Metal

Plastic

Other (describe): \_\_\_\_\_

How many gallons of MeCl are used annually at your facility? \_\_\_\_\_

<sup>(1)</sup> – Paint can include, but is not limited to, paint, enamel, varnish, shellac, and lacquer.

Does your facility perform spray application of coatings (as defined in §63.11180) that contain any of the 5 target HAPs to motor vehicles and mobile equipment, or to plastic and/or metal substrate on a part or product?

Yes     No

If you answered 'Yes', provide the following information:

Indicate the number of painters usually employed: \_\_\_\_\_

The following is a list of operations that are affected by this Subpart. Check the box(es) that correspond to operations at your facility.

Mixing rooms and mixing equipment

Spray booths, ventilated prep stations, curing ovens, and associated equipment

Spray guns and associated equipment

Spray gun cleaning equipment

Equipment used for storage, handling, recovery, or recycling of cleaning solvent or waste paint

If the source is a motor vehicle or mobile equipment surface coating operation, are vehicles repaired at the customer's location, rather than at a fixed location?

Yes     No     Not Applicable

**NOTE:** If your mobile equipment and/or motor vehicle surface coating facility does not utilize any coatings that contain any of the 5 target HAPs, you may file a 'Petition for Exemption' from this rule. The 'Petition for Exemption' form is also available at the following website:

[www.lincoln.ne.gov/city/health/environ/pollu/airforms.htm](http://www.lincoln.ne.gov/city/health/environ/pollu/airforms.htm)

## **SECTION 4 – Compliance Dates and Compliance Status**

Refer to the dates below to determine whether your facility is considered a 'new' or 'existing' source for the purposes of Subpart HHHHHH, and check the applicable box. In addition, indicate whether your facility is already in compliance with Subpart HHHHHH, or whether your facility will be in compliance with the rule at the compliance deadline. If your facility is a 'new' source, you must be in compliance with this rule, and should indicate such in the appropriate box.

<b>Compliance Dates (check one)</b>	
Note:	Initial startup is the first time equipment is brought online in a paint stripping and/or surface coating, and stripping/coating is first performed.
<input type="checkbox"/>	a. <b>This facility is a new source</b> (initial startup was on or after January 10, 2008) <ul style="list-style-type: none"><li>• Compliance date is the date of start-up</li></ul>
<input type="checkbox"/>	b. <b>This facility is a new source</b> (initial startup was on/after September 18, 2007 and before January 10, 2008) <ul style="list-style-type: none"><li>• Compliance date is January 9, 2008</li></ul>
<input type="checkbox"/>	c. <b>This facility is an existing source</b> (commenced construction/reconstruction before September 18, 2007) <ul style="list-style-type: none"><li>• Compliance date is January 10, 2011</li></ul>
<b>Compliance Status (check one)</b>	
Note:	For paint stripping operations, the relevant requirements that you must evaluate in making this determination are specified in 40 CFR Part 63, Sections 63.11173(a) through (d) of this subpart. For surface coating operations, the relevant requirements are specified in 40 CFR Part 63, Sections 63.11173(e) through (g) of this subpart.
<input type="checkbox"/>	a. I am already in compliance with each of the relevant requirements
<input type="checkbox"/>	b. I will be in compliance with each of the relevant requirements by the required compliance date

**If your facility is a new source, you MUST certify compliance at this time. Continue to the following pages to complete the Notification of Compliance Status.**

**If your facility is an existing source, and you CAN NOT or DO NOT wish to certify compliance with Subpart HHHHHH at this time, sign and date Section 5, below, and return pages 1-4 of this form to the Lincoln-Lancaster County Health Department, and US EPA Region 7.**

**If your facility is an existing source, and you DO wish to certify compliance at this time, skip Section 5 and continue to the following pages.**

## **SECTION 5 – Certification of Accuracy**

I certify that information contained in this report to be accurate and true to the best of my knowledge.

\_\_\_\_\_  
(Signature of Responsible Official)

\_\_\_\_\_  
(Date)

\* - A "Responsible Official" can be:

- The president, vice president, secretary, or treasurer of the company that owns the facility;
- The owner of the facility;
- The supervisor or manager of the facility;

## NOTIFICATION OF COMPLIANCE STATUS FORM

**If your source is a new source**, as indicated in Section 4, a responsible official must certify that the source is in compliance with each of the relevant requirements of this subpart by signing in Section 8 (below).

**If your source is an existing source**, the responsible official may certify that the source is already in compliance with each of the relevant requirements of this subpart, or certification of compliance with this subpart may be performed on or before March 11, 2011, as specified in 40 CFR Part 63, Section 63.11175(b). If you choose to certify compliance at this time, this document will act as your 'Notification of Compliance Status'.

### **SECTION 6 – Current Compliance Status**

- Yes**, the facility (including all affected operations listed in Section 3) IS operating in compliance with all of the relevant standards and other requirements of 40 CFR Part 63 Subpart HHHHHH: National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Facilities
- No**, the facility IS NOT operating in compliance with the relevant standards and/or other requirements of 40 CFR Part 63 Subpart HHHHHH: National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Facilities

Reason for noncompliance:

## **SECTION 7 – Compliance Methods for Affected Operations**

**In order to achieve compliance with this Subpart, all sources that utilize MeCl for paint stripping operations must utilize the following management practices.**

- Evaluate each application to ensure there is a need for paint stripping (e.g., evaluate whether it is possible to re-coat the piece without removing the existing coating)
- Evaluate each application where a paint stripper containing MeCl is used to ensure that there is no alternative paint stripping technology that can be used
- Reduce exposure of all paint strippers containing MeCl to the air
- Optimize application conditions when using paint strippers containing MeCl to reduce MeCl evaporation (e.g., if the stripper must be heated, make sure that the temperature is kept as low as possible to reduce evaporation)
- Practice proper storage and disposal of paint strippers containing MeCl (e.g., store stripper in closed, air-tight containers)

**1. Is your facility utilizing these management practices?**

Yes     No     Not applicable

**2. Does your facility utilize more than 1 ton of MeCl annually?**

Yes     No     Not applicable

**3. If you answered yes to question #2, has your facility developed and implemented an MeCl minimization plan?**

Yes     No

**4. If you answered yes to question #1, do you have copies of the following records at your facility?**

Yes     No    Records of paint strippers containing MeCl used for paint stripping operations, including the MeCl content of the paint stripper used. Documentation needs to be sufficient to verify annual usage of paint strippers containing MeCl (e.g., material safety data sheets or other documentation provided by the manufacturer or supplier of the paint stripper, purchase receipts, records of paint stripper usage, engineering calculations).

**5. If you answered yes to questions #2 and #3, do you have a copy of your MeCl minimization plan, as well as annual records of the MeCl minimization plan review and any updates to the MeCl minimization plan on-site at your facility?**

Yes     No

**In order to achieve compliance with this Subpart, all sources that perform surface coating on motor vehicles and mobile equipment, or that perform surface coating on miscellaneous plastic and/or metal parts must meet compliance with the following requirements.**

- All painters must be certified that they have completed training (described in Subpart 6H, §63.11173(f)) in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment.
- All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the requirements of paragraph (e)(2)(i), and either paragraph (e)(2)(ii), (e)(2)(iii), or (e)(2)(iv) of Subpart 6H, §63.11173.
- All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the Administrator.
- All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent.

**1. Is your facility in compliance with the requirements stated above, as well as all other applicable requirements contained in Subpart 6H?**

**Yes**     **No**     **Not applicable**

**2. If you answered yes to question #1, do you have copies of the following records at your facility?**

**Yes**     **No**    Certification that each painter has completed the training specified in §63.11173(f) with the date the initial training and the most recent refresher training was completed.

**Yes**     **No**    Documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in §63.11173(e)(3)(i).

**Yes**     **No**    Documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to or greater than 3.0 fluid ounces (89 cc) that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined by the Administrator to achieve a transfer efficiency equivalent to that of an HVLP spray gun, according to the procedure in §63.11173(e)(4).

**Not Applicable**

**Yes**     **No**    Copies of any notification submitted as required by §63.11175 and copies of any report submitted as required by §63.11176.

**Yes**     **No**    Records of any deviation from the requirements in §§63.11173, 63.11174, 63.11175, or 63.11176. These records must include 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.

**Yes**     **No**    Records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report.

## **SECTION 8 – Certification of Compliance**

*I certify that this facility is operating in compliance with Subpart HHHHHH, and that all information in this report is accurate and true to the best of my knowledge.*

\_\_\_\_\_  
(Signature of Responsible Official)

\_\_\_\_\_  
(Date)

\* - A "Responsible Official" can be:

- The president, vice president, secretary, or treasurer of the company that owns the facility;
- The owner of the facility;
- The supervisor or manager of the facility;