

This is a new permit condition titled "2D .1111 Subpart HHHHHH, Part 63 GACT". It is linked to Rule 2D .1111, and in the condition A.1 it should be noted as "2D .1111 (40 CFR 63, Subpart HHHHHH)". The user selected equipment description along with its ID number should appear in the yellowed section below.

15A NCAC 2D .1111 "MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY" - For the (NO EQUIPMENT SELECTED) the Permittee shall comply with all applicable provisions, including the notification, testing, and monitoring requirements contained in Environmental Management Commission Standard 15A NCAC 2D .1111, "Maximum Achievable Control Technology" as promulgated in 40 CFR 63, Subpart HHHHHH (6H) - National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations. Sources constructed after September 17, 2007 ("new sources") shall be in compliance by January 9, 2008 or upon startup, whichever is later, and sources operating prior to September 17, 2007 ("existing sources") shall be in compliance by January 10, 2011, with the following requirements:

- a. Motor Vehicle/Mobile, and Miscellaneous Equipment Surface Coating – As required by 40 CFR 63.11173, each motor vehicle and mobile equipment surface coating operation and each miscellaneous surface coating operation shall meet the following requirements:
 - i. All spray-applied coatings shall be applied in a spray booth, preparation station, or mobile enclosure;
 - ii. All spray booths, preparation stations, and mobile enclosures shall be fitted with a type of filter technology that is demonstrated to achieve at least 98 percent capture of paint overspray [40 CFR 63.11173(e)(2)(i)];
 - iii. Spray booths and preparation stations used to finish or refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. If a spray booth is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to, but not more than, 0.05 inches water gauge positive pressure;
 - iv. Spray booths and preparation stations that are used to coat miscellaneous parts and products or vehicle subassemblies shall have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth;
 - v. Mobile ventilated enclosures that are used to perform spot repairs shall enclose and, if necessary, seal against the surface around the area being coated such that paint overspray is retained within the enclosure and directed to a filter to capture paint overspray.

- vi. All spray-applied coatings shall 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 for which written approval has been obtained from the EPA Region IV.
- vii. Paint spray gun cleaning shall be conducted in enclosed cleaning tools/machines or by hand if spray guns are disassembled. Solvent spray from paint spray gun cleaning shall be completely contained by gun cleaning apparatus.
- viii. Training Requirements for Surface Coating Operations – The Permittee shall certify that all new and existing personnel, including contract personnel, who spray apply surface coatings for an affected source, have completed training in the proper application of surface coatings within 180 days of the employee's hiring. Personnel at an existing source must be trained within 180 days of hiring or by January 10, 2011, whichever is later. This training program must include, at a minimum, the following:
 - A. A list of all current personnel by name and job description who are required to be trained;
 - B. Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training topics in the following:
 - I. 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;
 - II. 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;
 - III. Routine spray booth and filter maintenance, including filter selection and installation; and
 - IV. Environmental compliance with the requirements of this subpart.
 - C. A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Owners and operators who can show by documentation or certification that a painter's work experience and/or training has

resulted in training equivalent to the training required in paragraph B. of this section are not required to provide the initial training required by that paragraph to these painters.

D. Refresher Training Requirement - All personnel shall receive refresher training and be recertified every five years. Refresher training shall include, at a minimum, all items required in the initial training requirements described above in paragraph B.

b. Paint Stripping Operations – As required by 40 CFR 63.11173, the Permittee shall implement management practices to reduce evaporative losses of methylene chloride (MeCl) from each paint stripping operation. These management practices shall include, at a minimum, the following objectives:

- i. 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);
- ii. 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;
- iii. Reduce exposure of all paint strippers containing MeCl to the air;
- iv. 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);
- v. Practice proper storage and disposal of paint strippers containing MeCl (e.g., store stripper in closed, airtight containers).
- vi. If the usage rate of MeCl is greater than one ton per twelve-month period, the Permittee shall develop and implement a written MeCl minimization plan. The written MeCl minimization plan shall address, at a minimum, the management practices specified above.
 - A. Each paint stripping operation with annual usage of more than one ton of MeCl shall maintain a copy of their current MeCl minimization plan on site at all times.
 - B. The Permittee shall post a placard or sign outlining the MeCl minimization plan in each area where paint stripping operations subject to this Subpart occur.
- vii. Each paint stripping operation shall maintain copies documenting annual usage of each paint stripper containing MeCl on site at all times.

- c. Reporting Requirements – As required by 40 CFR 63.11176, in addition to the notification requirements of the Environmental Protection Agency (EPA), the Permittee is required to NOTIFY the Regional Supervisor, DAQ, in WRITING, of the following:
- i. A notice documenting the actual date of initial start-up of any *new* surface coating operation subject to 40 CFR 63, Subpart HHHHHH and/or any paint stripping operation using paint strippers containing MeCl, postmarked within 180 days after such date. For an *existing* affected source the initial notification was due no later than January 11, 2010. The notice shall contain the following information:
- A. The company name;
 - B. The name, title, street address, telephone number, e-mail address (if available), and signature of the owner and operator, or other certifying company official;
 - C. The street address (physical location) of the affected source and the street address where compliance records are maintained, if different;
 - D. An identification of the relevant standard (in this case 40 CFR 63 Subpart HHHHHH);
 - E. A brief description of the type of operation;
 - I. For all surface coating operations, indicate whether the source is a motor vehicle and mobile equipment surface coating operation or a miscellaneous surface coating operation, or both, and include the number of spray booths and preparation stations, and the number of painters usually employed at the operation.
 - II. For paint stripping operations, identify the method(s) of paint stripping employed (e.g., chemical, mechanical) and the substrates stripped (e.g., wood, plastic, metal).
 - F. Each paint stripping operation must indicate whether they plan to use more than one ton of MeCl per year after the compliance date.
- ii. A statement of whether the source is already in compliance with each of the relevant requirements of this Subpart, or whether the source will be brought into compliance by the compliance date within 180 days of startup. This compliance statement shall include a statement by a responsible official with that official's name, title, phone number, e-mail

address (if available) and signature, certifying the truth, accuracy, and completeness of the notification, a statement that the source has complied with all the relevant standards of this subpart, and that this initial notification also serves as the notification of compliance status. The Permittee may choose to certify compliance as part of the initial startup notification.

- A. If your source is *existing* and you did not certify compliance in the initial notification then you must submit a Notification of Compliance Status on or before March 11, 2011.
- iii. The Permittee shall submit a report each calendar year to address any changes to information previously submitted in the initial notification(s) required by this Subpart, Notification of Compliance, or a previous annual notification of changes report submitted under this paragraph. This annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the following information:
 - A. Your company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.
 - B. The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this Subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance.
 - iv. The owner or operator of a paint stripping affected source that has not developed and implemented a written MeCl minimization plan shall submit a report for any calendar year in which more than one ton of MeCl is used. This report shall be submitted no later than March 1 of the following calendar year. The Permittee shall develop and implement a written MeCl minimization plan no later than December 31 of the year following the calendar year in which more than one ton of MeCl is used and then submit a Notification of Compliance Status report by March 1 of the following year.
- d. Recordkeeping Requirements - In accordance with 40 CFR 63.11177, the Permittee shall maintain the following records:

- i. A list of all current personnel by name and job description who are required to be trained; as well as Certification that each painter has completed the training, the date of the initial training, and the date that the most recent refresher training was completed;
- ii. Documentation of the filter efficiency of any spray booth exhaust filter material;
- iii. 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 EPA Region IV to achieve a transfer efficiency equivalent to that of an HVLP spray gun;
- iv. Copies of the initial startup notification (required by 40 CFR 63.11175) and annual notification of changes report (required by 40 CFR 63.11176);
- v. Documentation of the monthly usage rate of any paint strippers containing MeCl, including the MeCl content of each paint stripper used and the twelve-month rolling total of MeCl used;
- vi. If MeCl is used at a rate greater than one ton per twelve-month period, the Permittee shall maintain a written record of a MeCl minimization plan on site for the duration of paint stripping operations. This shall include records sufficient to determine an annual review of, and updates to, the MeCl minimization plan;
- vii. Records of any deviation from the requirements mandated by this Subpart. These records shall 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;
- viii. Records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report.