

## How will the EPA and DHEC track my shop?

DHEC tracks your shop by your "Air Quality Registration Permit."

## What do I have to submit to DHEC and EPA and when?

You will have to submit the following records:

- Submit to DHEC and the EPA an "Initial Notification" that informs the agencies that your shop is subject to this new regulation.
  - New Shops: by July 7, 2008 or 180 days after startup.
  - Existing Shops: by January 11, 2010
- Submit to DHEC a "Notification of Compliance Status" that certifies that your shop is in compliance with all of the requirements.
  - New Shops: Include with the Initial Notification
  - Existing Shops: March 11, 2011
- Submit to DHEC ONLY by March 1 of each year for both new and existing shops:
  - The self-certification form contained in your "Air Quality Registration Permit."
  - An "Annual Notification of Changes Report" when there have been changes in previously reported information.

## What do I have to keep on site?

- A copy of all notifications sent to DHEC and the EPA.
- A copy of your "Air Quality Registration Permit."
- A copy of the most recent self-certification checklist.
- Painter training certifications.
- Spray booth filter efficiency documentation.
- Documentation of spray gun transfer efficiency.
- MeCl content information, such as MSDS.
- Annual usage of MeCl for paint stripping.
- MeCl minimization plan if annual usage is more than 1 ton per year.
- Any problems (with guns, booths, filters, or efficiency) and how the problem was fixed.

Records must be available for DHEC review during inspections.

## For more information

This document provides an overview of the requirements for auto body shops. Please review the regulation in its entirety and other guidance documents at:

<http://www.epa.gov/ttn/atw/area/arearules.html>

For more information on state requirements, please visit:  
<http://www.scdhec.gov/areasources>

### EPA mailing address:

U.S. EPA Region 4  
Air Toxics and Monitoring Branch  
Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, GA 30303-8960

**U.S. Environmental Protection Agency ("EPA")**  
**Regulation - National Emissions Standards for**  
**Hazardous Air Pollutants ("NESHAP")**  
40 CFR Part 63 Subpart HHHHHH ("Subpart 6H")

**Bureau of Air Quality**  
2600 Bull Street  
Columbia, SC 29201  
Phone (803) 898-4064  
Fax (803) 898-4117  
[airquestions@dhec.sc.gov](mailto:airquestions@dhec.sc.gov)



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CR-009480 7/09



## Paint Stripping and Miscellaneous Surface Coatings

### 6H Facts

What does this mean for  
your auto body shop?

## Am I affected?

Yes you are, if your shop performs at least ONE of the following:

- Spray application of coatings to motor vehicles and other mobile equipment (i.e. motor homes, bulldozers, etc.);
- Spray application of coatings to plastic and/or metal parts and products with coatings that contain compounds of chromium, lead, manganese, nickel, or cadmium; and/or
- Paint stripping using products that contain Methylene Chloride (MeCl).

AND

If your shop is an “Area Source” (see Definitions and Dates).

## You are NOT affected if:

- Your shop is owned or operated by the Armed Forces of the United States.
- Your shop paints or strips for military munitions or equipment directly and exclusively used for the purposes of transporting military munitions.
- You paint or strip personal vehicles, property or possessions, either as a hobby or for maintenance. **However, the number of cars painted per year must not exceed two (2).**
- Your activities meet the definition of “research and laboratory activities” (See DHEC and EPA websites).
- Your activities meet the definition of “quality control activities” (See DHEC and EPA websites).
- Your shop is subject to another Federal or State regulation for painting or stripping.

If you qualify for one of the exceptions, maintain supporting documentation on site.



## My shop is affected, what do I do?

### For Paint Stripping Operations using MeCl

Minimize the usage of MeCl by using the following management practices:

- Evaluate the need for paint stripping (for example, is it possible to re-coat without stripping?).
- Identify alternative stripping methods.
- Reduce exposure of paint strippers to air (for example immediately close containers).
- Optimize application conditions (for example if heating, use the lowest temperature possible).
- Practice proper storage and disposal.

If you use more than one (1) ton of MeCl in a year, you must also have a written plan to minimize emissions. The plan should include practices that address:

- Optimizing stripper application conditions.
- Reducing exposure of stripper to the air.
- Practicing proper storage and disposal of materials containing MeCl.

To demonstrate MeCl usage, maintain the following records:

- List of materials that contain MeCl.
- MeCl content of each material (can be found on Material Safety Data Sheets).
- Amount of each material used.

### For Motor Vehicle/Mobile Equipment/Miscellaneous Surface Coating Operations

- Install a filter system on all spray booths/stations/enclosures including filters with at least 98% efficiency.
- Train/certify all painters on spray gun equipment selection, spray techniques, maintenance, and environmental compliance by the specified compliance date.
- Use a fully enclosed spray booths/prep station to refinish full motor vehicles or mobile equipment.
- Spray booths and prep stations must have a full roof and at least three complete walls or side curtains when refinishing vehicle parts.
- Spray-applied coatings must be applied with a high

volume, low pressure (HVLV) spray gun, electrostatic application, airless or air-assisted airless spray gun, or an equivalent technology.

- The operator must not create a mist or spray in the air when cleaning a paint spray gun.

## How does this regulation affect my shop?

- Your shop will be required to comply with the requirements of Subpart 6H at all times and DHEC personnel will periodically inspect your shop to determine your compliance.
- Your shop will receive an “Air Quality Registration Permit” from DHEC and a self-certification checklist.
- By using a more efficient method of painting, you will reduce pollution and save money on paint costs!

## How does this regulation affect my shop?

Definitions and Compliance Dates:

- An “Area Source” is an operation that emits (pollutes) without controls less than 10 tons per year (“TPY”) of any one hazardous air pollutant (“HAP”) or less than 25 TPY of any combination of two or more HAP. For Subpart 6H, applicability is based on the amount of paint stripping and painting that is performed (See DHEC or EPA website for list of HAP).
- If you are unsure about whether or not you are an area source, please contact DHEC for assistance.
- A “New Shop” is a shop that began construction after September 17, 2007, or a shop that existed prior to September 17, 2007, but did not perform spray application of coatings or paint stripping using MeCl until after September 17, 2007.
- An “Existing Shop” is a shop that was in operation and spraying paint or performing paint stripping before September 17, 2007.

Compliance Dates:

- New Shops: Upon startup (as soon as you first start painting).
- Existing Shops: January 10, 2011.