



Table of Contents

1.0	Self-Certification Checklist Instructions	Page 1
2.0	Self-Certification Checklist	Page 5
3.0	Annual Compliance Certification	Page 10
4.0	Return to Compliance Plan	Page 12

1.0 Self-Certification Checklist Instructions

1.1 What is Self-Certification?

On January 9, 2008, the U.S. Environmental Protection Agency published the final regulation that established requirements for autobody repair shops: 40 CFR Part 63, Subpart HHHHHH – National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (Subpart HHHHHH). In order to improve environmental protection, autobody repair shops must self-certify to the South Carolina Department of Health and Environmental Control (DHEC), Bureau of Air Quality (BAQ) that they are complying with the air quality requirements that apply to their shops. This new approach to regulation is an opportunity to meet and surpass South Carolina’s air quality regulations. This package contains the materials need to complete and submit the self-certification. The accompanying workbook provides the information needed to help you understand and comply with State and Federal air quality regulations. If you do not have a copy of the accompanying workbook, please call 803-898-4064.

1.1.1 Self-Certification Workbook for Autobody Repair Shops

The Workbook explains the regulations that apply to your shop, and how to make sure you are complying with them. It covers not just air quality regulations, but also management practices for general housekeeping and other environmental program media areas that can help your shop minimize human health risks and environmental impacts while saving money. The Workbook is designed to be used in conjunction with the accompanying Self-Certification Checklist and can also be used as a reference for your shop. **Please keep the workbook to use with each annual self-certification.**

1.1.2 Self-Certification Checklist and Accompanying Forms

This package consists of 3 forms that you may need to fill out, as described below.

- **Self-Certification Checklist:** The checklist contains a series of compliance questions, which generally require “yes” or “no” answers about whether or not your shop is following the applicable air quality requirements. Some of the “no” answers in the checklist are indicator questions marked with an (!) that require you to complete a Return to Compliance Plan.
- **Annual Compliance Certification Form:** The checklist ends with a certification statement which must be signed by the owner of the facility, or the person who can take legal responsibility for the facility.
- **Return to Compliance Plans:** Complete the Return to Compliance Plan if your shop is not in compliance with a particular checklist item at the time you complete your certification form. Each shop must detail its plans to address the particular item(s) to bring them back into compliance with air quality requirements within a specified period of time (no longer than 90 days). If you can correct a problem while you are completing the checklist (immediately), you do not have to submit a Return to Compliance Plan.



1.2 Submission Timeline

Self-Certification Checklists and accompanying forms are mailed as one package in January of each year. The first time a package of forms is mailed to a shop, a workbook will be included. The Annual Compliance Certification form must be returned and postmarked by March 1st of each year. Certification will take place every year during the same timeframe. Shops that submit Return to Compliance Plans will have until May 30 of the same year to correct the problem.

**Questions and/or comments can be directed to:
DHEC Bureau of Air Quality
Air Toxics Section
2600 Bull Street
Columbia SC 29201
803-898-4064**

1.3 Do I Have to Certify?

The self-certification program is mandatory. Every autobody repair shop is subject to state and federal air quality regulations and must annually certify that they are in compliance with the requirements of those regulations. If you have any questions regarding the status of your shop, please call us at 803-898-4064.

1.4 How Do I Fill Out the Self-Certification Forms?

1.4.1 Read the accompanying Workbook to understand your environmental responsibilities.

1.4.2 Make a copy of the Self-Certification Checklist and any other necessary forms to use as working drafts (or download and print from the internet at <http://www.scdhec.gov/environment/baq/AreaSources/Standards/6H.asp>).

1.4.3 Read the Self-Certification Checklist and identify all the questions that apply to your shop. You may not have to answer all of the questions on the checklist. The checklist itself will direct you to skip certain questions. Do not answer questions that you are directed to skip. Additional step-by-step instructions for the Self-Certification Checklist are listed in Section 1.8.

1.4.4 Fill Out the Self-Certification Checklist. Walk through your shop with the checklist and identify all the questions where you are already in compliance and those where you will need to make changes to come into compliance. This step should be done as soon as possible to make sure you can meet the March 1st deadline.

1.4.5 Look at the Workbook for Help. If you're having trouble understanding how to answer the questions, you can look up the answers in the Workbook. The Self-Certification Checklist provides a "Workbook Reference" that shows the chapter and section of the Workbook where you should look for more information to answer this question.

1.4.6 Complete the Return to Compliance Plans. If your shop will be out of compliance with any requirement after the certification deadline (March 1st), be sure to document each of these items in your Return to Compliance Plan.

1.4.7 Review your Self-Certification Checklist for completeness. Once complete, copy your answers from the draft and complete the Annual Compliance Certification Form. Then make a copy of the complete certification package for your files, and submit the original signed copy of the Annual Compliance Certification Form to DHEC. Be sure to include any Return to Compliance Plan forms, if applicable.



1.5 How Do I Submit a Self-Certification?

You are required to complete all applicable forms in this package and submit the Annual Compliance Certification Form and Return to Compliance Plan to the BAQ on or before March 1st of each year. Mail or hand-deliver the completed certification forms to:

**DHEC Bureau of Air Quality
Air Toxics Section Manager
2600 Bull Street
Columbia SC 29201**

1.6 What is Not Covered by the Self-Certification?

The Self-Certification is intended to cover the air quality requirements in state and federal regulations. There may be other federal, state, or local requirements or permits that apply to your shop, such as other environmental program media areas, that are not covered by the Self-Certification. You must still comply with those requirements. For questions related to requirements in other environmental program media areas, you may contact the Small Business Environmental Assistance Program toll-free at 1-800-819-9001.

1.7 What are the Advantages of the Self-Certification Program?

Compliance with air quality regulations is a requirement of all autobody repair shops. Autobody repair shops will be required to request coverage under a registration permit and be required to participate in the Self-Certification Program. Shops that do not request coverage under a registration permit will have to complete the full air quality permitting process and be subject to regular inspections by DHEC.

Here are some other advantages of participating in the Self-Certification Program:

- DHEC may reduce the inspection priority for you shop; although there is always a possibility of a random inspection.
- You can find and correct environmental violations before we discover them during an inspection.
- You will have completed a comprehensive evaluation of your shop's compliance status, making you better prepared for an inspection.
- DHEC Air Toxics Program will provide technical and compliance assistance if you encounter any questions or problems. The technical and compliance assistance may include understanding the regulation, evaluating spray gun options, determining methylene chloride usage, evaluating MSDS sheets, etc.

Note: Participation in the Self-Certification Program does not guarantee that your shop will not be subject to a random inspection, or an inspection prompted by an employee or neighbor complaint. Both state and federal environmental and occupational health and safety agencies have the authority to perform such inspections. These inspections can result in enforcement actions against your shop. Participation in this program will identify deficiencies and prepare your shop in the event of an inspection. Keep copies of your checklists to assist you in demonstrating compliance with applicable state and federal air quality regulations.



1.8 Detailed Instructions for Filling Out the Self-Certification Forms

1.8.1 Self-Certification Checklist

The **Self-Certification Checklist** questions provide DHEC with background information about the autobody repair shop and information about whether or not your shop is following the air quality standards and requirements that apply to it. The **Workbook** contains the information you will need to determine how to answer the questions. The checklist tells you where in the Workbook you can find information about the air quality requirements referred to in each question. **DHEC strongly advises you to consult the Workbook before answering any questions.** Most of the questions are “yes” or “no” questions about compliance with particular standards. In some cases, your answers to a specific question on the checklist will determine whether you have to answer the “dependent questions” that follow it. Before answering them, make sure that they apply to your shop. Some of the “no” answers in the checklist are indicator questions marked with an (!) that require you to complete a Return to Compliance Plan for that question.

Please note that it is your responsibility to keep your shop in compliance with environmental protection requirements at all times. You may be subject to enforcement action if you do not comply with the requirements. There are some questions that ask whether you have been doing a routine activity for the past year, such as properly maintaining your equipment. Be sure to comply with the requirements throughout the year. If you are not in compliance with the requirement on the date you certify, you must complete a **Return to Compliance Plan** (described below) and submit it with the **Self-Certification Checklist**.

1.8.2 Annual Compliance Certification Form

The Annual Compliance Certification Form is a preprinted statement which says that the person signing the form:

- has reviewed it,
- believes the information being submitted is true, and
- understands that there may be serious consequences for submitting false information to DHEC.

The statement may only be signed by the autobody repair shop owner or certain other types of senior managers. The types of managers that are allowed to sign the statement are listed below the space for the signature. The person who signs the form must also print or type his or her name and title on the appropriate lines, date the form, and check the space next to the type of manager he or she is. Note that you must hold one of the titles on the form to sign it.

1.8.3 Return to Compliance Plans

-MAKE COPIES OF THIS FORM BEFORE YOU BEGIN-

If your shop is unable to comply with a requirement at the time you certify, fill out this form. The form asks for the requirement you are violating, what you plan on doing to comply, and when you will be in compliance with the requirement. Note that submittal of a Return to Compliance Plan gives only an additional ninety (90) days to come into compliance. A separate form is required each time your answer to a checklist question indicates that a Return to Compliance Plan is required. Two copies of the Return to Compliance Plan forms can be found starting on Page 13 of this package. Attach all Return to Compliance Plan forms to your Annual Compliance Certification Form, and mail to DHEC. If you need more forms, make the necessary number of copies or call us for additional copies at 803-898-4064. You may also download and print additional forms from the internet at

<http://www.scdhec.gov/environment/baq/AreaSources/Standards/6H.asp>.



2.0 Self-Certification Checklist

Section A: Introduction

Subpart HHHHHH requires every autobody shop to perform all spray-applied operations in a spray booth or preparation station equipped with a filter. Autobody shops must also use specific types of spray guns, train painters on proper cleaning and spraying techniques, and keep specific records onsite. Spray booths, preparation stations, and filters are important to reduce the amount of overspray emitted into the environment and can help your shop save money. Every spray booth and preparation station is required to have a filter that has at least 98% capture efficiency and records must be kept onsite that confirm the filter's efficiency. Autobody shops may use published efficiency data provided by filter vendors to demonstrate compliance with this requirement. Gun cleaning must be done so that no mist or spray of the gun cleaning solvent and paint residue is created outside of the container used to collect the used gun cleaning solvent. Painters must be trained to use spray coatings properly and documentation of the training must be kept on site.

Please answer all the questions unless you are directed to skip a question or section. Every facility **must** answer the introduction, training and recordkeeping, and operational questions in Sections A, E, and F. If questions denoted by the symbol (!) are answered "No", then a Return to Compliance Plan must be completed and returned to DHEC.

Shop Information		
Shop Name	Shop Permit Number	
Shop Address	City/Town	Zip Code
Contact Person	Phone Number	Email (if available)

Section A Introduction Questions			Workbook Reference
A1.	Does the shop perform mobile repair services? (If yes, complete Sections B, E, and F)	<input type="checkbox"/> Yes <input type="checkbox"/> No	Section 4.3.3
A2.	Does the shop only spray paint or coat motor vehicle parts? (i.e., bumper, door, hood, vehicle subassemblies; no whole vehicles) (If yes, complete Sections C, E, and F)	<input type="checkbox"/> Yes <input type="checkbox"/> No	Section 4.3.4
A3.	Does the shop only spray paint or coat whole motor vehicles? (If yes, complete Sections D, E, and F)	<input type="checkbox"/> Yes <input type="checkbox"/> No	Section 4.3.5
A4.	Does the shop have a spray booth or preparation station?	<input type="checkbox"/> Yes <input type="checkbox"/> No (!)	Sections 4.1, 4.3.4, 4.3.5
A5.	Does the shop carry out all painting and coating processes in a spray booth or preparation station?	<input type="checkbox"/> Yes <input type="checkbox"/> No (!)	Section 4.1
A6.	Does the shop utilize paint strippers based with methylene chloride? (If yes, complete Section G)	<input type="checkbox"/> Yes <input type="checkbox"/> No	Section 4.6



Section B: Mobile Repair Services

Subpart HHHHHH requires that mobile ventilated enclosures used to perform spot repairs must enclose or seal against the surface around the area being coated so that paint overspray is retained within the enclosure and directed to a filter to capture paint overspray. The filter must have an efficiency of at least 98%.

Section B Questions			Workbook Reference
B1.	Does the mobile shop use an enclosure when performing spot repairs?	<input type="checkbox"/> Yes <input type="checkbox"/> No (!)	Section 4.3.3
B2.	Is paint overspray retained inside the enclosure?	<input type="checkbox"/> Yes <input type="checkbox"/> No (!)	Section 4.3.3
B3.	Does the enclosure have a filter?	<input type="checkbox"/> Yes <input type="checkbox"/> No (!)	Sections 4.3.1, 4.3.3
B4.	Is the efficiency of the filter at least 98%?	<input type="checkbox"/> Yes <input type="checkbox"/> No (!)	Section 4.3.1

Section C: Motor Vehicle Parts

Subpart HHHHHH requires that all autobody shops that only spray-apply coatings to miscellaneous **motor vehicle parts** (i.e. door, hood, bumper, etc.) and vehicle subassemblies must do so in a spray booth or preparation station that is fitted with a type of filter technology that is demonstrated to be at least 98% efficient. All spray booths and preparation stations must have a roof and three walls or side curtains and must be ventilated so that air is drawn into the booth.

Section C Questions			Workbook Reference
C1.	Does the spray booth or preparation station have a full roof and at least three complete walls or side curtains?	<input type="checkbox"/> Yes <input type="checkbox"/> No (!)	Section 4.3.4
C2.	Is the spray booth or preparation station ventilated so that air is drawn inside the booth or preparation station?	<input type="checkbox"/> Yes <input type="checkbox"/> No (!)	Section 4.3.4
C3.	Does the spray booth or preparation station utilize an exhaust fan that vents to the outside?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
C4.	Is the exhaust vent filtered?	<input type="checkbox"/> Yes <input type="checkbox"/> No (!)	Section 4.3.1
C5.	Is the efficiency of the filter at least 98%?	<input type="checkbox"/> Yes <input type="checkbox"/> No (!)	Section 4.3.1



Section D: Whole Motor Vehicles

Subpart HHHHHH requires all autobody shops that only spray-apply coatings to **whole motor vehicles** must do so in a spray booth or preparation station that is fitted with a type of filter technology that is demonstrated to be at least 98% efficient. All spray booths and preparation stations must be enclosed with a roof and four walls or side curtains and ventilated at negative pressure.

Section D Questions			Workbook Reference
D1.	Is the spray booth or preparation station completely enclosed with a full roof and four complete walls or side curtains?	<input type="checkbox"/> Yes <input type="checkbox"/> No (!)	Section 4.3.5
D2.	Is the spray booth or preparation station ventilated at a negative pressure?	<input type="checkbox"/> Yes <input type="checkbox"/> No (!)	Section 4.3.5
D3.	Does the spray booth or preparation station utilize an exhaust fan that vents to the outside?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
D4.	Is the exhaust vent filtered?	<input type="checkbox"/> Yes <input type="checkbox"/> No (!)	Section 4.3.1
D5.	Is the efficiency of the filter at least 98%?	<input type="checkbox"/> Yes <input type="checkbox"/> No (!)	Section 4.3.1
D6.	Do you have an automatic pressure balancing system that operates no higher than 0.05 inches water gauge positive pressure? (An automatic pressure balancing system is not necessary if you have negative pressure.)	<input type="checkbox"/> Yes <input type="checkbox"/> No	Section 4.3.5

Section E: Training and Recordkeeping

Subpart HHHHHH requires all painters to complete training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. Records of trainings, filter efficiency, and DHEC notifications must be kept on site.

Section E Questions			Workbook Reference
E1.	Does the shop certify that painters have been trained in the proper use and handling of paints, coatings, solvents, cleaning solvents, and spray equipment?	<input type="checkbox"/> Yes <input type="checkbox"/> No (!)	Section 4.5.1
E2.	Does the shop keep records of the following on site? a) Training sessions which include dates of training sessions, names of attendees, and training content; b) Filter efficiency; and c) All notifications submitted to BAQ, including the Initial Notification, Notification of Compliance Status, and previous self-certifications and Return to Compliance Plans?	<input type="checkbox"/> Yes <input type="checkbox"/> No (!) <input type="checkbox"/> Yes <input type="checkbox"/> No (!) <input type="checkbox"/> Yes <input type="checkbox"/> No (!)	Sections 4.5.1 and 4.5.2
E3.	Does the shop maintain MSDS or Certified Product Data Sheets for all coatings and other raw materials?	<input type="checkbox"/> Yes <input type="checkbox"/> No	



Section F: Operational Practices

Subpart HHHHHH requires that 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. Each spray gun must be cleaned so that no spraying or misting occurs.

Section F Questions			Workbook Reference
F1.	Does the shop utilize any of the following guns? (Check all that apply): a) High Volume, Low Pressure (HVLP) gun b) Electrostatic Application c) Airless Spray Gun d) Air-Assisted Airless Spray Gun	<input type="checkbox"/> Yes <input type="checkbox"/> No (!) <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Section 4.3.2
F2.	Does the shop utilize a gun not identified above? Type (specific) _____ Did the shop request and receive the proper approval from BAQ to use the spray gun?	<input type="checkbox"/> Yes (!) <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No (!)	Section 4.3.2
F3.	Does the shop utilize any of the following cleaning methods? (Check all that apply): a) Disassembled parts cleaned by hand b) Enclosed spray gun washer c) Flushing solvent through the gun without spraying	<input type="checkbox"/> Yes <input type="checkbox"/> No (!) <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Section 4.4.1
F4.	Does the shop utilize any other cleaning methods? Other (specific) _____	<input type="checkbox"/> Yes (!) <input type="checkbox"/> No	Section 4.4.1



Section G: Methylene Chloride (MeCl) Usage

If you use MeCl, Subpart HHHHHH requires autobody shops to evaluate each job to make sure there is a need for paint stripping and that there is no other paint stripping technology that can be used. You must also make sure you are reducing exposure of MeCl to the air by using management practices.

Section G Questions			Workbook Reference
G1.	Do you evaluate each job to ensure there is a need for paint stripping? (i.e., Evaluate whether it is possible to re-coat the piece without removing the existing coating)	<input type="checkbox"/> Yes <input type="checkbox"/> No (!)	Section 4.6.1
G2.	Do you evaluate each job where a paint stripper containing MeCl is used to ensure that there is no alternative paint stripping technology?	<input type="checkbox"/> Yes <input type="checkbox"/> No (!)	Section 4.6.1
G3.	Do you reduce exposure of all paint strippers containing MeCl to the air?	<input type="checkbox"/> Yes <input type="checkbox"/> No (!)	Section 4.6.1
G4.	Do you optimize application conditions when using paint strippers containing MeCl to reduce MeCl evaporation? (i.e., If the stripper must be heated, make sure the temperature is kept as low as possible to reduce evaporation)	<input type="checkbox"/> Yes <input type="checkbox"/> No (!)	Section 4.6.1
G5.	Do you practice proper storage and disposal of paint strippers containing MeCl?	<input type="checkbox"/> Yes <input type="checkbox"/> No (!)	Section 4.6.1
G6.	Have you calculated the actual tons of MeCl in the strippers used?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Section 4.6.2
G7.	Do you maintain copies of annual usage of paint strippers containing MeCl on site at all times?	<input type="checkbox"/> Yes <input type="checkbox"/> No (!)	Section 4.6.2
G8.	Has the facility written and implemented a MeCl minimization plan if there is more than one (1) ton of MeCl usage?	<input type="checkbox"/> Yes <input type="checkbox"/> No (!)	Section 4.6.2
G9.	Do you maintain a copy of the current MeCl minimization plan on site at all times?	<input type="checkbox"/> Yes <input type="checkbox"/> No (!)	Section 4.6.2



3.0 Annual Compliance Certification Form

Note: Complete all required Return to Compliance Plans before signing this statement!

Name of Shop: _____

Permit Number: _____

I _____, as the authorized representative of the above named autobody repair shop, attest:

- 1) That I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this certification statement;
- 2) That, based on my inquiry of those individuals responsible for obtaining the information, the information contained in this submittal is, to the best of my knowledge, true, accurate, and complete;
- 3) That I am fully authorized to make this attestation on behalf of this shop;
- 4) That I am aware that there are significant penalties for knowingly submitting false information.

Signature: _____ Date: _____

Printed Name: _____ Title: _____

Source of Signatory Authority: Owner

_____ (Other, please check below)

If a corporation: President Secretary Treasurer

Vice President (If authorized by corporate vote.)

Representative of the above (If authorized by corporate vote and if responsible for overall operation of the shop.)

If a Partnership: General Partner

If a Sole Proprietorship: Proprietor



Other Information

Have there been any changes to your facility, including ownership, relocation, shop closing, and/or operational changes (i.e., spray guns, paint materials, filter technology, etc)? Please indicate in detail what changes have taken place. The information provided in this section will meet the Annual Notification of Changes Report requirement listed in Subpart HHHHHH. Please see Section 4.5.2 of the Workbook for more information.

Ownership Changes

New Owner's Name: _____

Is the facility name changing? (Circle one) Yes No

New Facility Name: _____

Relocation

New Address: _____

Facility Closing

Closing Date: _____

Operational changes (i.e., spray guns, paint materials, filter technology, etc.):



4.0 Return to Compliance Plan

- Before you complete this form, make as many copies as needed. Complete a separate Return to Compliance Plan for **each** compliance question that requires one. Attach to the Annual Compliance Certification and return as one package.
- Only submit a Return to Compliance Plan for violations that you were unable to correct **before** certifying. **Please note that submittal of this Return to Compliance form gives your facility an additional 90 days (May 30 of the same year) to come into compliance.**
- Completing this form does not relieve the shop of its affirmative responsibility to operate in compliance with applicable regulations. Failure to operate in full compliance with the applicable regulations may result in enforcement actions which may include fines or penalties.

Shop Information		
Shop Name	Shop Permit Number	
Shop Address	City/Town	Zip Code
Contact Person	Phone Number	Email (if available)

Return to Compliance Information

1. What is the Compliance Question # for which you are reporting noncompliance?
Compliance Question # _____
2. What is the specific violation? (reference the Workbook Section # in which the requirement is explained and a description of the requirement)
Workbook Section # _____

Brief Description of Requirement:

3. What corrective action will you take to return to compliance?

4. Date the shop is expected to be in compliance with this issue? _____



4.0 Return to Compliance Plan

- Before you complete this form, make as many copies as needed. Complete a separate Return to Compliance Plan for **each** compliance question that requires one. Attach to the Annual Compliance Certification and return as one package.
- Only submit a Return to Compliance Plan for violations that you were unable to correct **before** certifying. **Please note that submittal of this Return to Compliance form gives your facility an additional 90 days (May 30 of the same year) to come into compliance.**
- Completing this form does not relieve the shop of its affirmative responsibility to operate in compliance with applicable regulations. Failure to operate in full compliance with the applicable regulations may result in enforcement actions which may include fines or penalties.

Shop Information		
Shop Name	Shop Permit Number	
Shop Address	City/Town	Zip Code
Contact Person	Phone Number	Email (if available)

Return to Compliance Information

1. What is the Compliance Question # for which you are reporting noncompliance?
Compliance Question # _____
2. What is the specific violation? (reference the Workbook Section # in which the requirement is explained and a description of the requirement)
Workbook Section # _____

Brief Description of Requirement

3. What corrective action will you take to return to compliance?

4. Date the shop is expected to be in compliance with the issue? _____