

Nine Metal Fabrication and Finishing Source Categories 40 CFR Part 63, Subpart XXXXXX (6X NESHAP)

Summary of Requirements: Industrial Process – Spray Painting

Spray painting is defined as the application of paints using a hand-held device that creates an atomized mist of paint and deposits the paint on a substrate. For the purpose of the 6X NESHAP, spray painting does **not** include:

- Use of spray guns with a paint cup capacity less than 3.0 fluid ounces;
- Use of hand-held, non-refillable aerosol containers;
- Powder coating or non-atomization applications of paint (e.g. dip/brush/flow coating);
- Applications that normally require use of an airbrush or gun extension;
- Paints that contain fillers that adversely affect HVLP (high-volume, low pressure) gun performance;
- Application of paint which has a dried film of less than 0.0005 inch;
- Thermal spray operations (e.g. metal spraying or metalizing).

The following requirements shall be followed only if the facility's **spray painting** operations have the potential to emit a **MFHAP** or use materials that contain a **MFHAP**.

REQUIRED MANAGEMENT PRACTICES

These requirements do not apply to affected sources located at fabricated structural metal manufacturing facilities, or to affected sources that spray paint objects greater than 15 feet, and that are not painted in spray booths or spray rooms.

- Operate all equipment associated with operations (including control equipment) according to the manufacturer's instructions.
 - Filters must be inspected and replaced according to the manufacturer's instructions.
- Spray booths or spray rooms must:
 - Have a full roof.
 - Have all the sides covered (at least two complete walls and barriers or curtains on the other sides).
 - Be ventilated (air is drawn into the booth and leaves only through the filter).
 - Have a filter system or be equipped with a water curtain that is demonstrated to achieve at least 98% capture of MFHAP.
- All spray-applied paints must be applied with a HVLP spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent high transfer efficiency technology (any use of equivalent technology must be approved by the Iowa Department of Natural Resources).
- All spray-gun cleaning must be done with either non-HAP gun cleaning solvents, or in a way that an atomized mist or spray of cleaning solvent/residual paint is not created outside the container used for collecting the cleaning solvent/residual paint.
- Each owner or operator of an affected spray painting source must certify that all workers performing painting¹ must be certified that they have received training on proper spray application, spray equipment setup, and spray equipment maintenance.
 - Existing Sources:** all personnel trained and certified no later than **July 25, 2011, or 180 days after hiring**, whichever is later.
 - New Sources:** all personnel trained and certified no later than **January 20, 2009, 180 days after startup, or 180 days after hiring**, whichever is later.

¹ These requirements do not apply to students of an accredited painting training program under supervision of instructor, or to operators of robotic or automated painting operations.

- At a minimum, the training program must include the following:
 - List of current personnel that are required to be trained.
 - Hands-on or classroom instruction on: spray gun equipment selection, set up, and operation; spray techniques designed to improve transfer efficiency; routine spray booth maintenance and filter selection, installation and maintenance; and environmental compliance with respect to this rule.
 - Description of methods to demonstrate, document, and provide certification of successful training.
- Training and certification is valid for a maximum of 5 years. Refresher training for re-certification must take place at least every five years.
- Records of training certification must be kept.

RECORD KEEPING AND REPORTING REQUIREMENTS

In addition to the required initial notification and notification of compliance status (see general 6X NESHAP fact sheet), facilities with this industrial process that have the potential to emit a MFHAP or use materials that contain a MFHAP must also comply with the reporting and recordkeeping requirements below.

Annual Certification and Compliance Reports

- Submit no later than **January 31 of each year**.
 - Cover the period from January 1 (or day after compliance date) to December 31 of the previous year.
- Report should include the following information:
 - Facility's name and address.
 - Statement by responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
 - Date of report and of beginning and ending dates of reporting period.

These reports must be kept in a readily-accessible location for inspector review.

Record Keeping

- The following records must be maintained in a form suitable and readily available for expeditious review.
 - Copies of all notifications and reports, and supporting documentation.
 - Records of applicability determinations.
 - Spray paint booth filter records or water curtain control efficiency tests.
 - Spray paint delivery system efficiency records to document the type of spray system.
 - Spray paint employee training records.
 - Copy of the manufacturer's instructions for equipment used for compliance.

Records must be maintained for five years. The first two years of records must be maintained on-site. Older records may be maintained off site.

Please refer to the full rule text of 40 CFR Part 63, Subpart XXXXXX (available at <http://www.epa.gov/ttn/atw/area/compilation.html>) to determine all applicable equipment requirements, management practices, monitoring requirements, recordkeeping requirements and reporting requirements necessary to be in compliance with this rule. Additional information is available at <http://www.iowadnr.gov/air/prof/NESHAP/>

For more information or questions please contact
 Iowa Department of Natural Resources: **1-877-AIR-IOWA**
 Iowa Waste Reduction Center: **1-800-422-3109**

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