Motor Vehicle Refinishing Initial Notification/ Compliance Certification/Notification of Changes & Illinois EPA Motor Vehicle Refinishing Registration

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Applicable Regulations:

National Emission Standards for Hazardous Air Pollutants (NESHAP)
Paint Stripping and Misc. Surface Coating Operations 40 CFR Part 63, Subpart HHHHHH

*Subpart HH of 35 Illinois Administrative Code 218.780-218.792 and 219.780-219.*792 ORGANIC MATERIAL EMISSION STANDARDS for Motor Vehicle Refinishing

Please review the attached instructions before completing this form. Please print or type all information.

Identify the Type of Notification Being Made (check all that apply)

☐ Initial Notification

☐ Compliance Certification (check if facility is already in compliance with all new requirements, see Part C below)

☐ Annual Notification of Changes (complete if changes in ownership, equipment, or location and/or see Part D below)

☐ Illinois EPA Motor Vehicle Refinishing Registration (Check ONLY for those motor vehicle refinishing facilities that are located in the following counties: McHenry, Lake, DuPage, Kane, Cook, Kendall (Oswego Township only), Grundy (Goose Lake and Aux Sable Townships only), Will, Madison, Monroe and St. Clair) *Subpart HH of 35 Illinois Administrative Code 218.780-218.792 and 219.780-219.*792 ORGANIC MATERIAL EMISSION STANDARDS for Motor Vehicle Refinishing

Mail 1 copy to each if Initial Notification/Compliance Certification/Notification of Changes Form (if Motor Vehicle Refinishing Registration Only mail one copy to Springfield):

Illinois Environmental Protection Agency
Bureau of Air, Compliance Section MC 40
1021 N. Grand Ave East
P.O. Box 19276
Springfield, IL 62794

USEPA Region 5
Air Enforcement & Compliance Assurance Branch AE-17J
77 West Jackson Blvd
Chicago, IL 60604

Air Operating Permit No. (if available):_____ BOA Facility ID No. (if available):_____

Part A – General Information

A.1 Company Information

Business Name: _____

Street Address (physical location): _____

City, State, Zip: _____

A.2 Owner Information

Name: _____ Title: _____

Mailing Address: _____

City, State, Zip: _____

Telephone: _____ E-mail (if available): _____

A.3 Operator Information

Is the Operator the same as the Owner? ☐ Yes ☐ No

If Operator information is different, please provide the following:

Name: _____ Title: _____

Mailing Address: _____

City, State, Zip: _____

Telephone: _____ E-mail (if available): _____

A.4 Certifying Official Information

Is the certifying company official the same as the Owner or Operator? ☐ Yes ☐ No

If certifying official information is different, please provide the following:

Name: _____ Title: _____

Mailing Address: _____

City, State, Zip: _____

Telephone: _____ E-mail (if available): _____

A.5 Records Location Information

Is the source a motor vehicle or mobile equipment surface coating operation that repairs vehicles at the customer's location, rather than at a fixed location? Yes ☐ No ☐

If yes, please provide the address where records demonstrating compliance are kept:

Mailing address: _____

City, State, Zip: _____

Part B – Initial Notification

B.1 Identification of Regulatory Standard

I am subject to 40 CFR Part 63 Subpart HHHHHH, National Emissions Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources — Yes ☐ ***(You must check this box.)***

B.2 New or Existing Source

Please check whether the area source is a new or existing source.

☐ New Source — Startup after 9/17/2007

☐ Existing Source — Startup on or before 9/17/2007

B.3 Paint Stripping Operations

Do you use paint strippers containing methylene chloride? ☐ Yes ☐ No ***If you answer "No," go to B.4.***

Methods of paint stripping employed (check all that apply):

☐ Chemical
☐ Mechanical
☐ Other (please describe): _____

Substrates stripped (check all that apply)

☐ Wood
☐ Metal
☐ Plastic
☐ Other (please describe): _____

Do you/will you use more than one (1) ton of methylene chloride annually? ☐ Yes ☐ No
(1 ton equals approximately 150 gallons of methylene chloride)

B.4 Surface Coating Operations

	Enter number of each		
	Spray booths	**Prep stations**	**Painters**
Do you surface coat motor vehicles or mobile equipment? ☐ Yes ☐ No			
Do you surface coat non-automotive plastic and/or metal parts with paints containing cadmium, chromium, lead, manganese, or nickel? ☐ Yes ☐ No			

Are you located in McHenry, Lake, DuPage, Kane, Cook, Kendall (Oswego Township only), Grundy (Goose Lake and Aux Sable Townships only), Will, Madison, Monroe and St. Clair counties? ☐ Yes ☐ No (If NO skip to C.1)

What is the total estimated number of gallons of coatings and solvents used annually? _____ (if less than 20 gallons annually skip to C.1)

Are all fresh and used solvent, solvent-laden cloths and paper, waste paint, and sludge stored in closed containers in order to reduce emissions? ☐ Yes ☐ No

Are all coating applicator guns cleaned with a device that recirculates solvents during cleaning, collects used solvent, and minimizes solvent evaporation? ☐ Yes ☐ No

Are electrostatic or high volume low pressure (HVLP) spray systems used to apply coatings? ☐ Yes ☐ No

Part C – Compliance Certification

C.1 Compliance Certification for Methylene Chloride Paint Stripping

Do you use paint strippers containing methylene chloride? ☐ Yes ☐ No ***If you answer "No," go to C.2.***

If you use paint strippers containing methylene chloride, you must meet the following requirements:

- Evaluate each application to ensure there is a need for paint stripping.
- Evaluate each methylene chloride paint stripping operation to ensure there is no alternative technology that can be used.
- Reduce exposure of paint strippers containing methylene chloride to the air.
- Optimize application conditions to reduce evaporation.
- Practice proper storage and disposal of paint strippers.

If you use more than one (1) ton of methylene chloride annually, you must do the following:

- Implement the requirements above.
- Maintain records on site at all times of annual usage of paint strippers containing methylene chloride.
- Develop and implement a written methylene chloride minimization plan. The plan must be kept on site.
- Post a placard or sign outlining the methylene chloride minimization plan in each area where the paint stripping occurs.

Please check one:

☐ The source is currently in compliance with each of the above requirements.
☐ The source will be in compliance with the above requirements by the compliance date (see below).
☐ The source is currently not in compliance with the above requirements.

Source Type	Compliance Date
New Source (startup after 1/9/2008)	Date of startup
New Source (startup after 9/17/2007 but on or before 1/9/2008)	1/9/2008
Existing Source (startup on or before 9/17/2007)	1/10/2011

C.2 Compliance Certification for Surface Coating

Do you surface coat motor vehicles or mobile equipment, or do you surface coat plastic and/or metal parts with paints containing cadmium, chromium, lead, manganese, or nickel? ☐ Yes ☐ No

If you surface coat motor vehicles or mobile equipment you must meet the following requirements or petition the United States Environmental Protection Agency (EPA) Administrator to exempt the operation from the surface coating regulatory requirements by demonstrating that the spray-applied coatings used by the facility do not contain the target hazardous air pollutants (HAP) above (paint stripping requirements still apply):

- All spray equipment operators are to be trained in proper application of surface coatings.
- All spray-applied coatings are to be applied with high volume low pressure (HVLP) spray guns or equivalent technology.
- All spray guns must be cleaned using non-atomizing methods.
- Spray-applied coatings are to be applied in a prep station or spray booth that has:
  - Negative pressure ventilation
  - 98 percent efficient filters
  - A full roof and three to four side walls depending on what will be painted
- Records demonstrating compliance must be kept on site.

Please check one:

☐ The source is currently in compliance with each of the above requirements.
☐ The source will be in compliance with the above requirements by the compliance date (see below).
☐ The source is currently not in compliance with the above requirements.
☐ The source will petition out of the surface coating portion of the rule prior to the compliance date by demonstrating that the spray-applied coatings used by the facility do not contain cadmium, chromium, lead, manganese, or nickel (paint stripping requirements still apply).

Source Type	Compliance Date
New Source (startup after 1/9/2008)	Date of startup
New Source (startup after 9/17/2007 but on or before 1/9/2008)	1/9/2008
Existing Source (startup on or before 9/17/2007)	1/10/2011

Part D – Notification of Changes in Compliance (Complete if new source indicating non-compliance with appropriate compliance dates above or if changes have occurred from previously filed initial notification or compliance certification)

If you have indicated that your source is not currently in compliance or if you are reporting a change from the previous calendar year, please provide an explanation of the non-compliance or changes. Describe any corrective actions being taken to achieve compliance (attach a separate sheet if necessary).

If you have not had a change in compliance status, go to Part E.

Part E – Compliance Verification Statement

I certify the truth, accuracy, and completeness of the information being submitted. The source has complied with all the relevant standards (those which apply according to my compliance dates above) of 40 CFR Part 63, Subpart HHHHHH.

Name (print): _____ Title: _____

Signature: _____ Date: _____

☐ Owner ☐ Operator ☐ Certifying official

The Illinois EPA is authorized to require, and you shall disclose, the information requested on this form pursuant to the Illinois Environmental Protection Act (Act), 415 ILCS 5/9. This information shall be provided using this form or by alternative means at your discretion. Failure to disclose the requisite information may result in your application being denied, and/or penalties being imposed as provided for in the Act, 415 ILCS 5/42-45.

Any person who knowingly makes a false, fictitious, or fraudulent material statement, orally or in writing, to the Illinois EPA commits a Class 4 felony. A second or subsequent offense after conviction is a Class 3 felony. (415 ILCS 5/44(h))

Instructions

Instructions for Motor Vehicle Refinishing Initial Notification/ Compliance Certification/ Notification of Changes & Illinois EPA Motor Vehicle Refinishing Registration

Additional information regarding these requirements including the regulations in their entirety can be found at: www.ienconnect.com/enviro

1. Who Must Complete This Form?

On January 9, 2008, the U.S. Environmental Protection Agency (EPA) issued a rule addressing hazardous air pollutant (HAP) emissions at area source facilities conducting paint stripping and miscellaneous surface coating activities. The rule (40 CFR Part 63, Subpart HHHHHH) regulates facilities conducting the following activities:

- Paint stripping operations that use materials containing methylene chloride,
- Spray application of coatings to motor vehicle and mobile equipment, including mobile repair operations, and
- Spray application of coatings to plastic and/or metal parts and products, if the coatings used contain one or more of the target HAPs (chromium, lead, manganese, nickel, or cadmium).

Specific operations and activities exempted from the regulation are described in Section 6 below.

If the auto refinisher conducts any one of the operations listed above and does not meet the exemption criteria in Section 6, this form must be completed and submitted to USEPA and the Illinois Environmental Protection Agency at the addresses listed in Section 4, unless the facility has filed a petition of exemption with USEPA and been granted exemption from the surface coating portion of the rule and does not perform paint stripping using methylene chloride. .

In addition, Illinois motor vehicle refinishers located in the following counties: McHenry, Lake, DuPage, Kane, Cook, Kendall (Oswego Township only), Grundy (Goose Lake and Aux Sable Townships only), Will, Madison, Monroe and St. Clair must also comply with State of Illinois requirements under Subpart HH of 35 Illinois Administrative Code 218.780-218.792 and 219.780-219.792 and must file this form to satisfy registration requirements if they have not already registered with the Illinois Environmental Protection Agency. Facilities cannot petition for exemption from Subpart HH of 35 Illinois Administrative Code 218.780-218.792 and 219.780-219.792 ORGANIC MATERIAL EMISSION STANDARDS for Motor Vehicle Refinishing .

This form should also be submitted to notify the agencies of any changes in ownership, location, equipment, or compliance status.

2. What Parts of the Form Must Be Completed?

This form is a combined form that can be used to satisfy the following four requirements:

- Initial Notification
- Compliance Certification
- Annual Notification of Changes
- Illinois EPA Motor Vehicle Refinishers Registration

Part A is the general information portion of the reporting forms and must be completed for all submittals.

Part B contains the required information to submit the Initial Notification and Illinois EPA Motor Vehicle Refinishers Registration.

Part C contains the required information to submit the Compliance Certification.

New area sources must submit both the Initial Notification and the Compliance Certification by the compliance date specified in Section 3 below, provided they are in compliance with the regulation. Existing area sources must submit the Initial Notification by the specified compliance date, and can submit the Compliance Certification at the later date specified in Section 3. If an existing source is in full compliance with the regulation when the Initial Notification is submitted, the Compliance Certification can be submitted at the same time. “New Source” and “Existing source” are defined in Section 5 below.

Part D should be filled out for the Annual Notification of Changes. You are only required to submit the annual notification of changes report on or before March 1 of each calendar year **if**:

- Initial Notification or Compliance Certification forms previously submitted contain information that has changed in the previous calendar year, **or**
- Deviations from the regulatory requirements occurred during the previous calendar year.

Note: Use of more than one (1) ton methylene chloride (1 ton equals approximately 150 gallons of methylene chloride) in a calendar year when you have declared on a previous Initial Notification form that less than one ton per year would be used is considered a change. If you use more than one ton methylene chloride in a calendar year, you are required to develop and implement a written Methylene Chloride Minimization Plan as described in §63.11173 (b),

and must achieve compliance with this requirement by December 31 of the year in which the Annual Notification of Changes report was submitted.

If you are using this form to satisfy the Annual Notification of Changes reporting requirement, you must complete the following parts:

- ✓ Part A
- ✓ Updated items in Parts B and C, as necessary
- ✓ Part D
- ✓ Part E

Part E requires a certifying official to attest to the truth, accuracy, and completeness of the information being submitted, and must be completed for all submittals. This statement certifies that you are in compliance with applicable requirements of this rule as they apply according to your compliance dates below.

3. When Must This Form Be Submitted?

The following table details when compliance must be achieved (Compliance Date) and when notifications must be submitted (Initial Notification Date and Certification of Compliance Date).

Notification and Compliance Dates

Source Type	Initial Notification Date	Compliance Date	Certification of Compliance Date
New Source	Must submit Initial Notification within 180 days after start up or by July 7, 2008 (whichever date is later)	Must be in compliance with regulation upon startup	Must submit Compliance Certification simultaneously with the Initial Notification (this form shall serve as both)
Existing Source	Must submit Initial Notification no later than January 11, 2010	Must be in compliance with regulation no later than January 11, 2011	Must submit Compliance Certification no later than March 11, 2011

4. Where Do I Send The Completed Form?

Please *make a copy of the completed form for your records*, and submit an original signed copy to the USEPA Region 5 Office and Illinois EPA at the following addresses:

Illinois Environmental Protection Agency
Bureau of Air, Compliance Section MC 40
1021 N. Grand Ave East
P.O. Box 19276
Springfield, IL 62794

USEPA Region 5
Air Enforcement & Compliance Assurance Branch AE-17J
77 West Jackson Blvd
Chicago, IL 60604

Note: Facilities who have been granted exemption from the surface coating portion of the rule by USEPA who do not perform paint stripping using methylene chloride may submit one copy of the form to the Illinois EPA ONLY to satisfy registration requirements under Subpart HH of 35 Illinois Administrative Code 218.780-218.792 and 219.780-219.792

5. Definitions

- **Area source** – any stationary source of hazardous air pollutants (HAP) that is not a major source of HAPs.
- **Existing source** – an area source that was engaged in surface coating and/or paint stripping on or before September 17, 2007 ***or*** the source began the installation of the surface coating and/or paint stripping equipment on or before this date.
- **Major source** – any stationary source or group of stationary sources located within a contiguous area and under common control that emits, or has the potential to emit, considering controls, 10 tons or more per year of any single HAP, or 25 tons or more per year of any combination of HAPs.
- **NESHAP** – National Emission Standards for Hazardous Air Pollutants.
- **New source** – an area source where initial startup of the surface coating and/or paint stripping operation occurred after September 17, 2007.
- **Paint stripping operations** – those operations that perform paint stripping using methylene chloride for the removal of dried paint (including but not limited to paint, enamel, varnish, shellac, and lacquer) from wood, metal, plastic, and other substrates at area sources where paint stripping is either the principal activity or an incidental activity.
- **Surface coating of miscellaneous metal and/or plastic parts** – those operations at area sources that involve spray application of coatings that contain the target HAP compounds to non-automotive parts or products made of metal and/or plastic.
- **Surface coating of motor vehicles and mobile equipment** – those operations at area sources that involve spray application of coatings to automobiles, light trucks, heavy duty trucks, buses, construction equipment, self-propelled vehicles, and equipment that may be drawn and/or driven on a roadway.
- **Target Hazardous Air Pollutants (HAP)** – compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

6. Who Is Exempt from the Regulation?

The regulation does not apply to the following activities:

1. 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.
2. 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.
3. Surface coating or paint stripping performed by individuals on their personal vehicles, possessions, or property, either as a hobby or for maintenance. This subpart also does not apply when these operations are performed by individuals for others without compensation. However, an individual who spray applies surface coating to more than two motor vehicles or pieces of mobile equipment per year is subject to the regulation pertaining to motor vehicles and mobile equipment regardless of whether compensation is received.
4. Surface coating or paint stripping that meets the definition of ‘‘research and laboratory activities’’ in §63.11180.
5. Surface coating or paint stripping that meets the definition of ‘‘quality control activities’’ in §63.11180.
6. Surface coating or paint stripping activities that are covered under another area source NESHAP regulation.

The surface coating portion of the regulation does not apply to the following materials:

1. Coatings applied from a hand-held device with a paint cup capacity that is equal to or less than 3.0 fluid ounces.
2. Surface coating applications using hand-held, non-refillable aerosol containers, powder coating, or non-atomizing application technology, including paint brushes, rollers, hand wiping, flow coating, dip coating, electrodeposition coating, web coating, coil coating, touch-up markers, or marking pens.
3. Thermal spray operations (also known as metallizing, flame spray, plasma arc spray, and electric arc spray) in which solid material is heated to a molten or semi-molten state and propelled to the work piece or substrate by compressed air or other gas, and a bond is produced upon impact.

The surface coating portion of the regulation does not apply to the following coatings:

1. Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances.
2. Paper film or plastic film that may be pre-coated with an adhesive by the film manufacturer.
3. Adhesives, sealants, maskants, or caulking materials.
4. Temporary protective coatings, lubricants, or surface preparation materials.
5. In-mold coatings that are spray-applied in the manufacture of reinforced plastic composite parts.

Note: ***The regulation allows for the owner or operator of motor vehicle or mobile equipment surface coating operations to petition the USEPA and Illinois EPA for an exemption from the regulation if it can be demonstrated that the coatings that are spray applied do not contain compounds that include the target hazardous air pollutants (HAP) chromium, lead, manganese, nickel, or cadmium; however, if the facility has not been granted exemption by Jan 10, 2010 or before commencing operation the facility must still file the initial notification with USEPA and Illinois EPA.***

: **All existing facilities who do not file a petition for exemption from the surface coating requirements of the regulation prior to the appropriate compliance date (Section 3 above) will not be allowed to petition for exemption in the future and will be subject to the regulatory requirements of 40 CFR Part 63, Subpart HHHHHH regardless of the HAP content of the facility's coatings. Should a facility that has been granted exemption from the surface coating regulations begin using the targeted HAP containing coatings all regulatory requirements will apply and compliance must be achieved prior to applying HAP containing coatings.**

Forms to petition for exemption can be found at www.ienconnect.com/enviro .

For more information contact the Illinois Small Business Environmental Assistance Program at 800/252-3998.