



Initial Notification, Compliance Certification, and Notification of Changes

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

Instructions on Page 5

Please review the attached instructions before completing this form. Please print or type all information.
Items marked with an * are required for all submittals.

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

Initial Notification Compliance Certification Change Notification

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 (required): _____

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 (required): _____

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 (required): _____

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

B.4 Surface Coating Operations

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

Enter number of each

Spray booths	Prep stations	Painters

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 to minimize emissions of methylene chloride:

- Evaluate each application to ensure paint stripping is necessary.
- If paint stripping is necessary, ensure there are no alternative methods or chemicals that can be used.
- Limit evaporation of paint strippers containing methylene chloride.
- Optimize application conditions to reduce evaporation (i.e., if heated, keep heat as low as possible).
- 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 9/17/2007)	Date of startup
Existing Source (startup on or before 9/17/2007)	1/10/2011

C.2 Compliance Certification for Surface Coating

Do you spray apply coatings to motor vehicles or mobile equipment? Yes No

Do you spray apply coatings to non-automotive plastic or metal parts with paints containing cadmium, chromium, lead, manganese, or nickel? Yes No

If you answer "no" to both questions above, go to Part D.

If you answer "yes" to either of the questions above, you must meet the following requirements:

- All spray equipment operators must be trained in proper application of surface coatings.
- All spray-applied coatings must be applied with high volume low pressure (HVLP) spray guns or equivalent.
- 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, and
 - 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.

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

Part D - Change in Compliance Status

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 of 40 CFR Part 63, Subpart HHHHHH.

Name (print): _____

Title: _____

Signature: _____

Date: _____

Owner Operator Certifying official

Attachment

Summary of NESHAP 6H Certification Requirements and Instructions for completing NESHAP 6H Certification Form

This attachment serves to provide a summary of the NESHAP 6H certification requirements and provides a fillable pdf NESHAP 6H certification form that outlines the required information that must be submitted to EPA. For your convenience, you may use this form to achieve compliance with the NESHAP 6H rule. The following instructions are provided for using this form:

Paint Stripping and Miscellaneous Surface Coating Operations Area Source Rule, 40 CFR Part 63, Subpart HHHHHH.

The complete rule, including all exemptions and requirements plus comments and discussion, can be found at www.epa.gov/ttn/atw/area/fr09ja08.pdf.

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 area source 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 EPA at the address listed in Section 4.

2. What Parts of the Form Must Be Completed?

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

- Initial Notification
- Compliance Certification
- Notification of Changes

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.

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

New area sources must submit both the Initial Notification and the Compliance Certification within 180 days of start up. Existing area sources must submit the Initial Notification by January 11, 2010 and must submit the Compliance Certification by March 11, 2011. 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. Notification, compliance, and compliance certification dates are summarized in Section 3 below. "New Source" and "Existing source" are defined in Section 5.

Part D should be filled out for notification of changes. You are only required to submit the 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 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 more than one (1) ton of methylene chloride was used.

If you are using this form to satisfy the 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**.

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	Must be in compliance with regulation at start up	Must submit Compliance Certification simultaneously with the Initial Notification
Existing Source	Should have submitted Initial Notification no later than January 10, 2011	Should have been in compliance with regulation no later than January 10, 2011	Should have submitted Compliance Certification no later than 30 days after the March 11, 2011 required compliance date for Existing Sources.

4. Where Do I Send the Completed Form?

To cut down on administrative errors and reduce the burden of additional paperwork, EPA's Compliance Assistance Branch is offering electronic means to submit your compliance paperwork. You may download a fillable pdf of the compliance forms at: _____ and email the form to the NESHAP 6H Mailbox at R4_NESHAP_6HA@epa.gov or submitting directly on a webform by clicking on the following link: _____.

Lastly, you may make a copy of the completed form for your records, and submit an original signed copy to the EPA Region 4 Office at the following address:

EPA Region 4
Attn: Todd Russo, Chief
Air Enforcement Branch
Enforcement and Compliance Assurance Division
61 Forsyth Street, SW
Atlanta, Georgia 30303-8960

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 EPA for an exemption from that section of the regulation if it can be demonstrated that the coatings that are spray applied do not contain the target hazardous air pollutants chromium, lead, manganese, nickel, or cadmium.

Note: Please take a moment to fill out this NESHAP 6H form and return it to us. You may use the enclosed form to meet all ESHAP 6H Initial Notification, Compliance, Certification, and Notification of Changes requirements.