



Automobile Dealers Association of Indiana, Inc.

BULLETIN

Bulletin #1109 – September 6, 2011

Comparison of Automobile Refinishing Rules

Our partner, KPA, has compiled a Federal / State comparison of the new environmental laws relating to paint refinishing.

Even if your dealership does not have a Collision Center, you should know how the laws apply to on-site refinishers.

Please take a moment to review (or pass on to your pertinent manager) the attached chart and its important compliance information.

If you have any questions, please contact Zach Pucillo, your KPA EH&S Engineer, at (317) 201-2335 or email him at zpucillo@kpaonline.com .

(continued)



Comparison of Automobile Refinishing Rules

Indiana's Rule – 326 IAC 8-10 (Vaughn Ison – (317) 233-0432)

Federal Rule – NESHAP Subpart HHHHHH (Mark Stoddard – (317) 233-1039)

Topic	326 IAC 8-10	Subpart 6H
Applicability	Recently expanded to all Indiana counties	New Sources – compliance by 1/9/08 Existing Source – 1/9/11 Applies to all motor vehicle surface coating operations.
Exemptions	Activities including: <ul style="list-style-type: none"> • Aerosol coating application • Graphic design application • Touch-up coating application <p>Individuals who own or operate a facility that refinishes three (3) or fewer motor vehicles per calendar year.</p>	Surface coating or paint stripping performed by individuals on their personal vehicles or property either as a hobby or for maintenance. Subpart does not apply when operations are performed for others without compensation. An individual who applies surface coating to more than two motor vehicles per year regardless of whether compensation is received. Owners/operators may apply for an exemption if they can demonstrate that they spray no coatings that contain the target HAP.
Work Practice Standards	<ul style="list-style-type: none"> • Spray guns must be cleaned in an enclosed device. • Coating application equipment must be electrostatic, HVLP, or other equipment capable of at least 65% transfer efficiency. • Housekeeping practices including disposing of preparation or cleanup materials in a closed waste container, storing solvents and coatings in closed containers, and minimizing overspray. • Develop and implement a training program with an annual refresher update by May 1st of each year. Records of training include the date of training, a list of persons attending, and a statement indicating satisfactory 	<ul style="list-style-type: none"> • All spray coatings must be applied in a booth, preparation station, or mobile enclosure fitted with a filter system demonstrated to achieve at least 98% collection efficiency. • All coatings must be applied with HVLP guns, electrostatic application, airless guns, air-assisted airless spray guns, or an equivalent technology demonstrated to achieve transfer efficiency comparable to one of the technologies listed above. • Gun cleaning done so that an atomized mist or spray is not created outside of a container that collects used gun cleaning solvent. • All painters must be certified that they have completed training in

	<p>completion of training requirements.</p>	<p>proper surface coating application and proper setup and maintenance of spray equipment. Recertification at least once every five years.</p>
Compliance Procedures	<ul style="list-style-type: none"> Each manufacturer who commercially provides coatings shall keep records and provide a written document detailing product information. Shop owner/operator shall submit to IDEM a statement certifying full compliance with the rule. 	<p><u>Training Requirements:</u></p> <ul style="list-style-type: none"> New sources must train personnel by 1/7/07 or within 180 days after hiring. Existing sources must train personnel by 1/10/11 or within 180 days after hiring. Recertification at least once every five (5) years. <p><u>Training Program Elements:</u></p> <ul style="list-style-type: none"> Gun Equipment selection, set up, and operation. Spray technique to improve transfer efficiency and minimizing overspray. Routine booth and filter maintenance and filter selection and installation. Environmental Compliance with requirements of Subpart 6H.
Recordkeeping and Reporting	<p><u>Owner/Operator requirements:</u></p> <ul style="list-style-type: none"> Track each batch of coating mixed or refinishing job performed. Track each surface preparation product used. Maintain MSDS or product data sheets for at least three (3) years. <p>Maintain records of training program (Section 5(d)).</p> <p>Maintain records of initial compliance statement (Section 6(c)).</p> <p>Report within 30 days any incidence of noncompliant coating used, reasons for use, and corrective actions.</p>	<p><u>Initial Notification:</u></p> <ul style="list-style-type: none"> New sources must submit by 1/7/08 or within 180 days after initial startup. Existing sources must submit by 1/11/10. <p><u>Notification of Compliance Status:</u></p> <ul style="list-style-type: none"> Existing sources must submit by 3/10/11 only if compliance was not already certified in the initial notification. Report compliance, non-compliance, and corrective actions being taken. <p><u>Notification of Changes Report:</u> Submit annually prior to 3/1 if any previously reported information changed during the previous year.</p> <p><u>Recordkeeping:</u></p> <ul style="list-style-type: none"> Painter training certification Filter efficiency documentation Documentation that each non-HVLP gun with a 3.0 oz or greater capacity has been determined by EPA to achieve equivalent transfer efficiency Copies of notifications and reports submitted Records of compliance assessments

Source: Indiana Department of Environmental Management
http://www.in.gov/idem/files/final_comparison_8-10_6H_01-24-11.pdf
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