

# NESHAP 6H IN / NOCS

## INITIAL NOTIFICATION / NOTIFICATION OF COMPLIANCE STATUS FOR PAINT STRIPPING & MISCELLANEOUS SURFACE COATING AREA SOURCES<sup>1</sup> (as amended on May 23, 2018)

This Initial Notification / Notification of Compliance Status is to meet the requirements of §63.11175(a) and (b) of 40 Code of Federal Regulations (CFR), Part 63, Subpart HHHHHH (6H; *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources*). Copies of the Federal Register (FR) notices can be found at the links below:

73 FR 1759, January 9, 2008 (<https://www.gpo.gov/fdsys/pkg/FR-2008-01-09/pdf/E7-24718.pdf>)

### Due Date

For new affected sources, this Initial Notification is due no later than 180 days after initial startup or July 7, 2008, whichever is later. Sources constructed or reconstructed on or after September 17, 2007, are considered new affected sources. If you are the owner or operator of a new source, you are not required to submit a separate Notification of Compliance Status, provided that you were able to certify compliance with NESHAP 6H on the date of the Initial Notification and your compliance status has not since changed; otherwise, you are required to submit an updated copy of this form as a Notification of Compliance Status.

For existing affected sources, this Initial Notification is due no later than January 11, 2010. Sources constructed or reconstructed before September 17, 2007 are considered existing affected sources. If you are the owner or operator of an existing source and did not certify that your source is already in compliance, you are required to submit an updated copy of this form as a Notification of Compliance Status.

If required, submittal of your Notification of Compliance Status is due on or before March 11, 2011 or within 180 days of startup, whichever is later.

### Name and Address (i.e., physical location) of the Paint Stripping and Miscellaneous Surface Coating Source

Print or type the following information for each facility for which you are making this Initial Notification / Notification of Compliance Status:

Operating Permit Number (OPTIONAL)	Facility ID Number (IF KNOWN)	
Facility Name		
Facility Street Address		
City	State	Zip Code
Facility Local Contact Name	Title	Phone Number
Email Address		

<sup>1</sup> You are subject to NESHAP 6H if you own or operate an area source that performs one or more of the following: (1) paint stripping using methylene chloride (MeCl) for the removal of dried paint; (2) spray application of coatings, as defined in 40 CFR §63.11180, to motor vehicles and mobile equipment, including operations that are located in stationary structures at fixed locations and mobile repair and finishing operations; and (3) spray application of coatings that contain target HAPs.

For additional information, see information presented later in this form or 40 CFR §63.11170(a)

**Briefly Describe your Paint Stripping and Miscellaneous Surface Coating Source**

Facilities are subject to NESHAP 6H if you perform one or more of the following activities. Definitions for spray applications of coatings, facility maintenance, and other terms can be found in 40 CFR §63.11180. Check each box that describes the applicable activities (note, more than one box may be checked):

- This facility performs paint stripping using methylene chloride (MeCl) for the removal of dried paint (including, but not limited to, paint, enamel, varnish, shellac, and lacquer) from wood, metal, plastic, and other substrates.
- This facility performs spray application of coatings to motor vehicles and mobile equipment, including operations that are located in stationary structures and mobile repair and finishing operations that travel to a customer’s location, except spray coating applications that meet the definition of facility maintenance.
- This facility performs spray application of coatings that contain cadmium (Cd), chromium (Cr), lead (Pb), manganese (Mn), or Nickel (Ni) to a plastic and/or metal substrate on a part or product, except spray coating applications that meet the definition of facility maintenance or space vehicle.

**NOTE:** An area source of HAP is a source that is not a major source of HAP, is not located at a major source, and is not part of a major source of HAP emissions. A major source of HAP emissions is 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 any single HAP at a rate of 9.4 tons or more per year, or emit any combination of HAP at a rate of 24.4 tons or more per year.

**Name and Address of the Owner and the Operator**

Print or type the following information for each facility for which you are making this Initial Notification / Notification of Compliance Status:

Owner Name		
Owner Address		
City	State	Zip Code
Email Address		
Operator Name (if different than Owner)		
Operator Address (if different than Owner)		
City	State	Zip Code
Email Address		

**Identification of Requirements for Paint Stripping with Methylene Chloride (required for Initial Notification)**

If you indicated your facility is subject to NESHAP 6H because of paint stripping operations, please provide the following information:

- |  |   |
|--|---|
| Check all methods of paint stripping employed: | Substrates stripped (check all that apply): |
| <input type="checkbox"/> Chemical              | <input type="checkbox"/> Wood               |
| <input type="checkbox"/> Mechanical            | <input type="checkbox"/> Plastic            |
| <input type="checkbox"/> Other: _____          | <input type="checkbox"/> Metal              |
|  | <input type="checkbox"/> Other: _____       |

Do you plan to use more than 1 ton of MeCl annually?  Yes /  No

The main compliance elements for this standard are: implement management practices to minimize evaporative emissions, maintain records of annual usage, facilities that use more than 1 ton of MeCl annually must maintain a copy of the current minimization plan on site at all times. Check the box of the statement below that best describes your facility at the time of this Initial Notification.

- This facility is already in compliance with each of the relevant requirements.
- This facility will be in compliance with each of the relevant requirements by the compliance dates listed above.
- I plan to change operations at this facility prior to January 10, 2011, to avoid being subject to NESHAP 6H.

**Identification of Requirements for Miscellaneous Surface Coating Operations (required for Initial Notification)**

If you indicated your facility is subject to NESHAP 6H because of surface coating operations for motor vehicles, or is subject because of cadmium (Cd), chromium (Cr), lead (Pb), manganese (Mn), or Nickel (Ni), please provide the following information:

Number of Spray Booths: \_\_\_\_\_ Number of Painters Employed: \_\_\_\_\_  
 Number of Preparation Stations: \_\_\_\_\_

The main compliance elements for this standard are: operator training (repeated every 5 years), high-velocity low pressure (HVLP) or equivalent spray guns, enclosed spray area, 98% efficient filters, and non-atomized spray gun cleaning. Check the box of the statement below that best describes your facility at the time of this Initial Notification.

- This facility is already in compliance with each of the relevant requirements.
- This facility will be in compliance with each of the relevant requirements by the compliance dates listed above.
- I plan to change operations at this facility prior to January 10, 2011, to avoid being subject to NESHAP 6H.

**Certification of Compliance Status (required for Notification of Compliance Status)**

Check the box of the statement below that best describes your facility at the time of this Notification of Compliance Status.

- This facility is a new source (initial startup was on or after September 17, 2007). A responsible official must certify that the source is in compliance with each of the relevant NESHAP 6H requirements.
- This facility is an existing source (initial startup was before September 17, 2007). A responsible official may certify below that the source is already in compliance with each of the relevant requirements of NESHAP 6H, or submit a separate certification no later than March 11, 2011, as specified in 40 CFR §63.11175(b). Please check one:
  - I am certifying compliance below.
  - I will submit the Notification of Compliance Status by March 11, 2011, or provide certification that I am no longer subject to NESHAP 6H.

**Submittal of Initial Notification / Notification of Compliance Status**

Maintain a copy of this Initial Notification / Notification of Compliance Status for your records. This Initial Notification / Notification of Compliance Status should be sent to the following address:

Air & Water Quality Branch  
 Linn County Public Health  
 1240 26<sup>th</sup> Avenue Ct. SW  
 Cedar Rapids, IA 52404  
 Telephone: (319) 892-6000; Fax: (319) 892-6099

A digital copy of this Initial Notification / Notification of Compliance Status may be submitted to the e-mail address below so long as the copy submitted is identical to the version retained in the facility records.

[ComplianceReporting-Air@linncounty.org](mailto:ComplianceReporting-Air@linncounty.org)

**Certification**

I certify the truth, accuracy, and completeness of this notification.

- The source is a motor vehicle and mobile equipment surface coating operation, but does not use the target HAP. With this certification, the facility is requesting an exemption from NESHAP 6H.
- This source has complied with all the relevant standards of NESHAP 6H. This notification also serves as the Notification of Compliance Status.

\_\_\_\_\_ (Responsible Party<sup>2</sup> – Signature)  
 \_\_\_\_\_ (Title) \_\_\_\_\_ (Date)

<sup>2</sup> *Responsible Party* (or Responsible Official) is defined under 40 CFR §63.2 as any of the following: the president, vice-president, secretary, or treasurer of the company that owns the plant; the owner of the plant; the plant engineer or supervisor; a government official if the plant is own by the federal, state, city, or county government; or a ranking military officer if the plant is located on a military installation.