



# GUIDE

National Emissions Standard for  
Hazardous Air Pollutants (NESHAP)

**MISCELLANEOUS SURFACE  
COATING OPERATIONS  
AT AREA SOURCES IN IOWA**



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**Iowa Air Emissions Assistance Program**

Phone: 319-273-6588 or 800-422-3109

[www.iwrc.org/IAEAP/](http://www.iwrc.org/IAEAP/)

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*Iowa Department of Natural Resources - Air Quality Bureau*

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## WHY THIS RULE IS NEEDED

The U.S. Environmental Protection Agency (EPA) and the Iowa Department of Natural Resources (DNR) are required by law to reduce exposure to hazardous air pollutants (HAP), also known as “air toxics.” HAP are known or suspected to cause cancer or other serious health effects such as birth defects. Coatings used in automobile and mobile equipment refinishing contain HAP and therefore may pose a risk to public health in the vicinity of the operations, especially in urban areas.

**Area Sources.** An “Area Source,” sometimes called a “minor source” or a “small source,” is defined as a facility that emits or has the potential to emit less than 10 tons of any single HAP and less than 25 tons of any combination of HAP per year.

**Source Categories.** Types of operations identified by EPA as needing regulation are referred to as “source categories.” There are 70 area source categories that EPA has identified as needing regulation. Three of these are included in the *National Emission Standards for Hazardous Air Pollutants (NESHAP): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources* [40 Code of Federal Regulations (CFR) Part 63, Subpart HHHHHH], sometimes called “6H” or “6H NESHAP”. For brevity, the term “6H NESHAP” is used to refer to this regulation throughout the rest of this document.

- ❖ Paint stripping operations that use methylene chloride (MeCl) to remove dried paint from wood, plastic, metal or other substrates. **NOTE:** This source category is **not** covered in this guide. A separate fact sheet summarizing the paint stripping regulations is available from the DNR upon request.
- ❖ Motor vehicle and mobile equipment spray-applied surface coating operations
- ❖ Miscellaneous surface coating of plastic and metal parts using spray application of coatings containing compounds of chromium (Cr); lead (Pb), manganese (Mn), Nickel (Ni) and Cadmium (Cd).

## WHO IS INCLUDED

The 6H NESHAP regulations apply to any operation that does the following:

- Applies surface coatings to motor vehicles and/or roadway use equipment; or
- Sprays liquid coatings on plastic and/or metal substrates (underlying material) which contain the **Target HAP**. For the 6H NESHAP, the Target HAP are compounds of **chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni) and cadmium (Cd)**. Coatings are considered to contain the Target HAP if:
  - The coating contains any individual Target HAP that is an OSHA-defined carcinogen and the concentration is equal to or greater than 0.1 percent by mass; or
  - The coating contains any individual Target HAP that is not an OSHA-defined carcinogen and the concentration is equal to or greater than 1.0 percent by mass. As of May 2009, manganese is the only Target HAP that is not an OSHA-defined carcinogen.

The information on the concentration of a Target HAP in a coating material can be found on the most recent Material Safety Data Sheet (MSDS) or by contacting the coating material manufacturer.

## WHO MAY BE EXEMPTED

- Motor vehicle and mobile equipment surface coating operations may petition for exemption if they demonstrate that the coatings sprayed at the facility do **not** contain the Target HAP. An exemption petition form is included in this guide and is also available at <http://www.iowadnr.gov/air/prof/NESHAP/>.
- Miscellaneous surface coating operations that spray liquid coatings on plastic or metal substrates which do **not** contain Target HAP are automatically exempt. No petition for exemption is required. Surface coating operations that coat substrates other than plastic or metal are not subject to this rule.

## WHAT IS EXEMPTED

### Exempted Coating Operations

- Surface coating performed on site at installations owned or operated by the U.S. Armed Forces, NASA or the National Nuclear Security Administration.
- Surface coating of military munitions manufactured by or for the U.S. Armed Forces or equipment directly and exclusively used for the purposes of transporting military munitions.
- Coating performed by an individual on personal vehicles, possessions, or property, either for hobby/maintenance, provided that no more than two motor vehicles or pieces of mobile equipment are coated per year. This exemption also applies when these operations are performed by individuals for others without compensation.
- Surface coating that meets the definition of “research and laboratory activities” in the 6H NESHAP.
- Surface coating that meets the definition of “quality control activities” in the 6H NESHAP.
- Surface coating activities that are covered under a different NESHAP, such as the area source NESHAP for metal fabrication and finishing (40 CFR Part 63, Subpart XXXXXX).

### Exempted Applications

- Spray applied protective oils for metal, bases, or acids (or a combination of these substances)
- Adhesives, sealants, maskants, or caulking materials
- Temporary protective coatings, lubricants, or surface preparation materials
- In-mold coatings spray applied in the manufacture of reinforced plastic composite parts.
- Coatings applied from a hand-held device with a paint cup capacity that is equal to or less than 3.0 fluid ounces.
- Surface coating application using powder coating, hand-held, nonrefillable aerosol containers, or nonatomizing application technology, including, but not limited to, paint brushes, rollers, hand wiping, flow coating, dip coating, electrodeposition coating, web coating, coil coating, touch-up markers, or marking pens.
- Thermal spray operations (also known as metalizing, flame spray, plasma arc spray, and electric arc spray, among other names).

## **WHAT IS EXEMPTED** cont.

### **Facility Maintenance**

Spray coating applications defined as facility maintenance are **not** subject to this rule. Examples of facility maintenance are:

- Surface coating performed as part of the routine repair or renovation of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity.
- Surface coating associated with the installation of new equipment or structures, and the application of any surface coating as part of janitorial activities.
- Application of coatings to stationary structures or their additions at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs.
- The refinishing of mobile equipment in the field or at the site where they are used in service and at which they are intended to remain indefinitely after refinishing. Such mobile equipment includes, but is not limited to, farm equipment and mining equipment for which it is not practical or feasible to move to a dedicated mobile equipment refinishing facility. Such mobile equipment also includes items such as fork trucks, that are used in a manufacturing facility and which are refinished in that same facility.

### **Not Included as Facility Maintenance**

Surface coating of motor vehicles, mobile equipment, or items that routinely leave and return to the facility, such as delivery trucks, rental equipment, or containers used to transport, deliver, distribute, or dispense commercial products to customers, such as compressed gas canisters. ***These activities must be considered for possible 6H NESHAP applicability.***

***If your facility or operation does not meet any of the exemptions listed above, please read the rest of this document to learn what is required to comply with the 6H NESHAP.***

## **REQUIREMENTS**

*This guide is designed to help facilities understand and comply with the requirements in 40 CFR Part 63, Subpart HHHHHH. For specific requirements including the complete federal regulation, refer to: <http://www.epa.gov/ttn/atw/area/compilation.html>.*

### **Spray Applied Coatings**

- All spray-applied coatings must use high-volume low-pressure (HVLP), air-assisted airless, airless, or electrostatic spray guns. An alternative may be used if the spray gun manufacturer demonstrates that it has a transfer efficiency (TE) comparable to the spray guns listed above and written approval has been obtained from the DNR.

## REQUIREMENTS cont.

- Painters must be certified once every five years that they have received training on proper spray application, equipment setup and equipment maintenance. Minimal training includes:
  - Hands-on and classroom instruction on spray gun; equipment selection, set up and operation;
  - Training on spray techniques designed to improve transfer efficiency;
  - Training on routine spray booth maintenance and filter selection, installation and maintenance; and
  - Environmental compliance with respect to the 6H NESHAP.
- Facilities may develop their own in-house training program which can be certified by the facility owner. All painting personnel must receive refresher training for recertification every five years.
- All spray areas must be fitted with a filter technology demonstrated to achieve a 98 percent capture efficiency of paint overspray. This requirement does not apply to waterwash spray booths that are operated and maintained according to the manufacturer's specifications.
- All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure.
- Spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, four complete walls or complete side curtains, and be ventilated under negative pressure. However, fully enclosed spray booths equipped with door/opening seals and an automatic pressure balancing system may operate up to 0.05 inches water gauge positive pressure.
- Spray booths and preparation stations used for coating miscellaneous parts or vehicle subassemblies must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so air is drawn into the booth. Booths may have opening for conveyors and parts that pass through the booth for finishing.
- Mobile ventilated enclosures used to perform spot repairs must enclose the surface around the area being coated so overspray is retained in the enclosure and directed to a filter (for overspray capture).
- All spray-gun cleaning must be done so 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. Spray gun cleaning may be accomplished by hand cleaning, use of an enclosed gun wash unit, or by flushing equipment with solvent (provided the solvent is not atomized outside the container used for solvent collection).

## Compliance Dates

### Existing Sources:

If your facility has been performing surface coating operations on or before September 17, 2007, your facility is considered an existing source and the compliance date is **January 10, 2011**.

Painter training/certification must be completed within **180 days after hiring** or no later than **January 10, 2011**, whichever is later.

### New Sources:

If your facility began surface coating operations after September 17, 2007, it is considered a new source and the compliance date is **January 8, 2008**, or the facility's **initial start-up date**, whichever is later.

Painters must be trained and certified within **180 days after hiring** or no later than **July 7, 2008**, whichever is later.

## RECORDKEEPING

Records should be maintained in a form suitable and readily available for expeditious review. Affected facilities must keep the following records to document compliance:

- Training certification records for painters. These records must include the initial training date and the most recent refresher training date for each painter, as well as the hire date of any painter hired after the source's compliance date.
- Filter efficiency documentation demonstrating that filters meet or exceed the 98 percent capture efficiency requirement.
- When the facility uses something other than HVLP, air-assisted airless, airless, or electrostatic application equipment, documentation stating the spray gun has been determined by the DNR to achieve a TE equivalent to an HVLP spray gun.
- Copies of all notifications and reports submitted to the DNR.
- Documentation of any deviations from the requirements and the corrective action taken.

### Compliance Summary

- Use high efficiency spray guns
- Train and certify operators
- Enclose spraying areas
- Capture at least 98 percent of overspray
- Capture paint and solvent when cleaning

## AIR CONSTRUCTION PERMITS

The DNR issues air construction permits to ensure that facilities are meeting air quality requirements. Prior to initiating construction, installation, reconstruction or alteration of equipment, a permit is required unless a specific exemption applies [567 Iowa Administrative Code (IAC) 22.1].

- Facilities that spray less than 3 gallons per day facility-wide may use the DNR Permit by Rule (PBR) Notification for all booths at the facility. See the attached PBR Notification form for eligibility requirements (the form is also available at <http://www.epa.gov/ttn/atw/area/compilation.html>).
- Facilities that spray 3 gallons per day or more facility-wide are required to either obtain a construction permit for each booth or show that the facility qualifies for an exemption.
- Facilities located within Polk or Linn counties must obtain the applicable air permits from their local air pollution control agency.

Polk County Public Works - Air Quality Division  
5885 NE 14<sup>th</sup> Street; Des Moines, IA 50313  
Phone: 515-286-3351  
Internet: [www.airquality.co.polk.ia.us](http://www.airquality.co.polk.ia.us)

Linn County Public Health - Air Quality Division  
501 13<sup>th</sup> Street NW; Cedar Rapids, IA 52405  
Phone 319 892-6000  
Internet: [www.air.linn.ia.us](http://www.air.linn.ia.us)

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## **The following DNR forms are attached:**

- Initial Notification-Notification of Compliance Status-Petition for Exemption
- Notification for Permit by Rule for Spray Booths

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## Initial Notification- Notification of Compliance Status-Petition for Exemption

### Miscellaneous Surface Coating Area Source Rule

40 Code of Federal Regulations (CFR) 63.11169 – 63.11180 (Subpart HHHHHH)

*This is a multi-purpose notification form that may be used to fulfill the requirements for 1) Initial Notification; 2) Notification of Compliance Status; or 3) Petition for Exemption. The questions below indicate the information that is required for each type of notification.*

**1. Facility Information (required for all notifications):**

Facility Name:		Facility Number (if known):	
Facility Street Address:	City:	State:	Zip:
Owner's Name and Title:	Owner's phone number:	Owner's email (if available):	
Owner's Mailing Address (if different from facility street address):	City:	State:	Zip:

If the Operator information is different from above, please provide the following:

Operator's Name and Title:	Operator's phone number:	Operator's email (if available):	
Operator's Street Address (if different from facility street address):	City:	State:	Zip:

Is the facility 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

**2. Identification of Standard (required for all notifications):**

Yes, this facility is subject to 40 CFR Part 63, Subpart HHHHHH, *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources* (6H NESHAP), because this facility fits one of the following descriptions:

- An area source surface coating operation that coats metal and/or plastic products, motor vehicles, or mobile equipment is subject to the 6H NESHAP if the operation uses coatings that contain the Target HAP (lead, chromium, nickel, cadmium, manganese).
- An area source motor vehicle or mobile equipment surface coating operation that does **not** use the Target HAP is considered subject to the 6H NESHAP until an exemption request has been approved by the DNR. This notification form may be used as an exemption request. *If your source is in this category, you may skip ahead to the "Responsible Official Certification" section.*
- An area source metal and/or plastic products surface coating operation that does **not** use the Target HAP is exempt from the 6H NESHAP. *If your source is in this category, you do not need to complete this notification.*

3. **Brief description of the operation (required for Initial Notification and Notification of Compliance Status):**
- a. This facility has a (check all that apply):
- Motor Vehicle or Mobile Equipment Surface Coating Operation
  - Miscellaneous Surface Coating Operation
- b. Number of spray booths: \_\_\_\_\_
- c. Number of preparation stations: \_\_\_\_\_
- d. Number of painters usually employed: \_\_\_\_\_

4. **Compliance Status, please check one (required for Initial Notification):**
- For surface coating operations, the relevant requirements are specified in the 6H NESHAP, 40 CFR 63.11173(e) through (g). The main compliance elements for this standards are: operator training (repeated every five years), HVLP or equivalent spray guns, enclosed spray area, 98% efficient filters, and non-atomized spray gun cleaning.
- 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 date.
    - **New Source** (after September 17, 2007, but before January 9, 2008): compliance date is **January 9, 2008**
    - **New Source** (after Jan 9, 2008): compliance date is **date of startup**
    - **Existing source** (before September 17, 2007): compliance date is **January 10, 2011**
  - I plan to **change operations** at this facility prior to January 10, 2011, to **avoid being subject** to this rule.
- NOTE: New facilities must submit the Initial Notification within 180 days of startup. Existing facilities must submit the Initial Notification by January 11, 2010.*

5. **Certification of Compliance Status, please check one (required for Notification of Compliance Status):**
- This facility is a **new source** (initial startup was on or after September 17, 2007). Startup Date: \_\_\_\_\_
    - If the source is a new source, a responsible official must certify below that the source is in compliance with each of the relevant requirements of the 6H NESHAP. *NOTE: New facilities must submit the Notification of Compliance Status within 180 days of start-up.*
  - This facility is an **existing source** (initial startup was before September 17, 2007). Startup Date: \_\_\_\_\_
    - If the source is an existing source, a responsible official may certify below that the source is already in compliance with each of the relevant requirements of the 6H NESHAP, or submit a separate certification no later than March 11, 2011, as specified in 40 CFR Section 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'm no longer subject to the rule.

Responsible Official Certification (check <u>all</u> that apply)		
<input type="checkbox"/>	I certify the truth, accuracy, and completeness of this notification.	
<input type="checkbox"/>	The source is a motor vehicle and mobile equipment surface coating operation, but does <u>not</u> use the Target HAP. With this certification, the facility is requesting <u>an exemption</u> from the 6H NESHAP.	
<input type="checkbox"/>	The source has complied with <u>all</u> the relevant standards of the 6H NESHAP. This notification also serves as the Notification of Compliance Status.	
Responsible Official Name	Responsible Official Signature	Date

Submit this notification to the following agency(ies):

- Iowa Department of Natural Resources, NESHAP Coordinator, 7900 Hickman, Suite 1; Windsor Heights, IA, 50324
- If the facility is located in either Linn County or Polk County, this notification shall also be submitted to the appropriate county office:

**Polk County Public Works** – Air Quality Division  
5885 NE 14<sup>th</sup> Street; Des Moines, IA 50313

**Linn County Public Health** - Air Quality Division  
501 13<sup>th</sup> Street NW; Cedar Rapids, IA 52405



IOWA DEPARTMENT OF NATURAL RESOURCES  
AIR QUALITY BUREAU

**NOTIFICATION LETTER FOR  
PERMIT BY RULE FOR SPRAY BOOTHS**

To be eligible for a permit by rule for spray booths, a facility must meet all applicable requirements established in 567 Iowa Administrative Code (IAC) subrule 22.8(1) **and** must certify that the facility is in compliance with or otherwise exempt from the requirements of National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Surface Coating Operations at Area Sources (40 CFR Part 63, Subpart HHHHHH). The owner or operator shall complete this form and submit **1 original** to: Iowa DNR, Air Quality Bureau, 7900 Hickman Road Suite 1, Urbandale, IA 50322.

*Retain a copy of the completed form for your records.  
The permit becomes effective upon the DNR's receipt of this notification letter.*

**Section 1 – Facility Information**

Print in ink or type		For DNR Use Only	
		Field Office _____	
		Facility ID _____	
_____	_____		
Name of Firm/Company	Facility Name (if different)		
_____	_____		
Mailing Address -Street/PO Box	City	State	Zip
_____	_____	_____	_____
_____	_____	_____	_____
Equipment Location - Street	City	State	Zip
_____	_____	_____	_____
_____	_____	_____	_____
Person to Contact	Phone Number	Fax Number	

**Section 2 - Applicability**

Please complete the five applicability questions below unless otherwise directed. A facility that is not eligible to use this form must apply for a construction permit as specified under 567 IAC subrules 22.1(1) and 22.1(3) unless otherwise exempt from the requirement to obtain a construction permit.

1. What is the facility-wide spray material use *per day*? (check one)
  - One Gallon per day or less (recordkeeping is required per 22.8(1)"b")
  - More than one gallon per day but less than three gallons per day (recordkeeping & spray booth stack heights are required per 22.8(1)"c")
  - Three gallons or more per day (not eligible for Permit by Rule for Spray Booths)
  
2. The spray booths at the facility will spray apply coatings to what type of materials? (check all that apply)
  - Motor vehicles or mobile equipment (e.g. any device that may be drawn or driven on a roadway)
  - Plastic or metal parts and products
  - Wood or other substrates not metal or plastic (Skip to Section 3 if no other no other materials are checked)

## Section 2 – Applicability (continued)

3. Is the *primary*<sup>1</sup> activity of your facility in one of the following nine metal fabrication and finishing source categories? If you answer yes to this question and the following question about the types of coatings you spray in your booth, you may be subject to 40 CFR Part 63, Subpart XXXXXX. Please contact the Air Quality Bureau to determine which rule applies to your facility and if additional information is needed prior to submitting this notification letter. Autobody shops are currently not included in any of the nine listed metal fabrication and finishing source categories.

Yes (Check all that apply.)

- Electrical and Electronic Equipment Finishing Operations (including motor and generator manufacture, and electrical machinery, equipment, and supplies, not elsewhere classified);
- Fabricated Metal Products;
- Fabricated Plate Work (Boiler Shops);
- Fabricated Structural Metal Manufacturing;
- Heating Equipment, except Electric;
- Industrial Machinery and Equipment Finishing Operations (including construction machinery manufacturing; oil and gas field machinery manufacturing; and pumps and pumping equipment manufacturing);
- Iron and Steel Forging;
- Primary Metal Products Manufacturing;
- Valves and Pipe Fittings.

No

<sup>1</sup> Many facilities perform these metal fabrication and finishing processes but are not subject to Subpart XXXXXX unless they are "primarily engaged" in operations which are classified in one of the listed nine source categories. To check if you are subject, crosscheck your SIC/NAICS codes with the SIC/NAICS codes that are subject to this rule and listed at this web link: <http://www.epa.gov/ttn/atw/area/met-fab-6x-applicability.xls>. A more detailed description of the affected source categories is included in the text of the rule, available at <http://www.epa.gov/ttn/atw/area/arearules.html>.

4. Are the operations at your facility specifically exempt from NESHAP Subpart HHHHHH - Miscellaneous Surface Coating Operations at Area Sources? A complete list of exemptions is included in 40 CFR Part 63.1169(d)

Yes (Check all exemptions that apply *and* Skip to Section 3 if all operations at the facility are exempt)

- Surface coating performed on site at installations owned or operated by the US Armed Forces, NASA or the National Nuclear Security Administration.
- Surface coating of military munitions, as defined in §63.11180, manufactured by or for the US Armed Forces or equipment directly and exclusively used for the purposes of transporting military munitions.
- Coating performed by an individual on their possessions (not including motor vehicles or mobile equipment), either for hobby or maintenance.
- Coating performed by an individual on others' possessions (not including motor vehicles or mobile equipment), either for hobby or maintenance for which no compensation is received.
- Coating performed by an individual on personal or others' motor vehicles or mobile equipment as long as no more than two vehicles or pieces of mobile equipment are coated per year.
- Surface coating that meets the definition of "research and laboratory activities" in §63.11180.
- Surface coating that meets the definition of "quality control activities" in §63.11180.
- Surface coating activities that are covered under another area source NESHAP.

No

5. Do the coatings spray applied in your booth(s) contain<sup>2</sup> Cadmium, Chromium, Lead, Manganese or Nickel?

- Yes. The facility is subject to the requirements of 40 CFR Part 63, Subpart HHHHHH and must submit notification of compliance status with this notification letter.
- No. The facility is not subject to the requirements of 40 CFR Part 63, Subpart HHHHHH.

<sup>2</sup> In order for a coating to contain the target HAP as defined under the NESHAP, the target HAPs must be present in concentrations greater than 0.1 percent by mass for Cadmium, Chromium, Lead and Nickel or be present in concentrations greater than 1.0 percent by mass for Manganese. Refer to product MSDS, manufacturer's Product Specification Sheet or contact the coating manufacturer directly to determine if the coating contains any of the target HAP at the defined concentrations.

### Section 3 – Spray Booth Description

Please provide the following details for each of the paint booths at your facility. If additional space is needed, please attach a separate sheet.

**LIST ALL SPRAY BOOTHS AT THE FACILITY:**

	Spray Booth ID #	Booth Type	Location
<i>Ex.</i>	<i>Spray booth 1</i>	<i>Cross-draft automotive</i>	<i>N.E. Corner of building A</i>
1			
2			
3			
4			
5			
6			
7			
8			

Continue on Page 4 ⇨

**Section 4 – Certifications (PLEASE READ CAREFULLY)**

All facilities using this notification form must complete the **SPRAY BOOTH CERTIFICATION** below. Only facilities that are spray applying coatings to motor vehicle, mobile equipment or plastic or metal parts and products must complete the **SPRAY MATERIAL CERTIFICATION**, unless they have determined they are exempt from requirements of 40 CFR Part 63, Subpart HHHHHH. Facilities that *do not* spray apply coatings to motor vehicle, mobile equipment or plastic or metal parts and products are only required to completed the **SPRAY BOOTH CERTIFICATION** and *do not* need to complete either of the **SPRAY MATERIAL CERTIFICATIONS** listed below.

**SPRAY BOOTH CERTIFICATION:**

*"I certify that all spray booths at the facility and listed in Section 3 are in compliance with all applicable requirements of rule 567 IAC 22.8(1)(455B). I understand that this equipment shall be deemed permitted under the terms of 567 IAC 22.8(1)(455B) only if all applicable requirements of 567 IAC 22.8(1)(455B) are met. This certification is based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete."*

**SPRAY MATERIAL CERTIFICATION (only check one box if applicable):**

*"I certify that none of the coatings used in my motor vehicle or mobile equipment spray booth contain Cadmium, Chromium, Lead, Manganese or Nickel. I understand that if circumstances change, such that I intend to spray apply coatings containing these materials, I shall comply with the requirements of the NESHAP for Miscellaneous surface Coating (40 CFR Part 63, Subpart HHHHHH) and submit the initial notification required by §63.11175."*

*I intend to use the following types of coatings in my motor vehicle or mobile equipment spray booth:  
(For example: polyurethane coatings)*

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**OR**

*"I certify that I am subject to and in compliance with the requirements of 40 CFR Part 63, Subpart HHHHHH. I have attached my notification of compliance status demonstrating how I will operate in compliance with the NESHAP. I understand that I must submit all subsequent notifications and reports as required by §63.11175 and §63.11176 and complete on recordkeeping as required by §63.11177"*

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Signature

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Title

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Date

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Print Name