

Fact Sheet

October 2019

Georgia Air Quality Regulations for Auto Collision Repair Shops

Georgia Auto Collision Repair Initiative

Federal Rule to Control Auto Collision Repair Emissions

On January 9, 2008, the U.S. Environmental Protection Agency (US EPA) signed into law a new rule to control the emissions of hazardous air pollutants potentially released from small shops throughout the U.S. that perform specific paint stripping and spray painting activities. The rule is entitled the *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources* (40 CFR Part 63, Subpart HHHHHH). This federal rule, commonly referred to as “Rule 6H” was adopted into Georgia’s Rules for Air Quality Control (RAQC) (Chapter 391-3-1-.02(9)(b)(148)) on December 20, 2009.

The goal of Rule 6H is to reduce emissions of the following hazardous air pollutants or “target HAPs”:

- Methylene chloride (MeCl) in paint stripping products; and
- Compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), and cadmium (Cd) in spray-applied coatings.

Is My Shop Subject to Rule 6H?

If your auto collision repair shop spray applies coatings or strips paint using MeCl-containing products (e.g., “Aircraft Stripper”) then you must comply with Rule 6H requirements.

What Are the Requirements for Spray-Coating Activities?

Rule 6H requires shops that perform spray coating activities use the following technologies and best practices to minimize the emission of paint overspray (40 CFR 63.11173(e)):

High-Efficiency Spray Technologies: All spraying must be conducted using a high-volume low-pressure (HVLP) spray gun or equivalent US EPA-approved technology, such as:

- Electrostatic;
- Airless; and
- Air-assisted airless.

If the shop chooses to use an alternative high-efficiency spray technology not listed above, documentation must be obtained from the manufacturer stating that the technology has been approved by the US EPA Administrator as being equivalent to HVLP and the other technologies.

It is recommended that all shops retain a copy of the product specifications for each spray gun

as documentation of the type of spray gun and recommended settings for operation.

Spray Enclosures: All spraying must be conducted within a spray booth, prep station, or mobile ventilated enclosure that meets the following criteria:

- Enclosures that are large enough to hold a complete vehicle must have a ceiling and four complete walls (or side curtains).
- Vehicle parts may be sprayed within an enclosure that has a ceiling and three complete walls (or side curtains). Openings in the walls and roof for conveyors are also allowed.
- Mobile enclosures used for spot repairs must enclose and seal against the area being repaired, such that the overspray is captured and directed through an exhaust filter.
- All enclosures must be operated at negative pressure, such that the overspray

is captured and directed through an exhaust filter. Sealed booths with a pressure balancing system may be operated at no more than 0.05 inches water gauge positive pressure.

- All enclosures must be outfitted with an exhaust filter capable of achieving 98% capture of the coating overspray. Rule 6H does not specify a particular filter media that must be used, just that the filter achieves at least the 98% capture. The shop must retain documentation of this performance, which is available from the filter manufacturer or supplier.

Spray Gun Cleaning: All spray gun cleaning must be done in such a way as to avoid the release of solvent and residual paint mists into the air. Never spray cleaning solvent through the spray gun outside of a fully enclosed spray gun washer. Proper cleaning methods include:

- Use of a fully enclosed spray gun washer;
- Hand cleaning of disassembled parts; and
- Flushing cleaning solvent through the spray gun without pressurizing with air.

What Are the Requirements for MeCl Paint Stripping Activities?

To minimize emissions of MeCl during paint stripping activities, Rule 6H requires that the following management practices be implemented at shops that use MeCl-containing products (e.g., "Aircraft Stripper")(40 CFR 63.11173(a)):

- Evaluate each application to insure there is a need to strip the old paint from the surface;
- Evaluate each application where MeCl-containing paint stripper is to be used to ensure that there is no alternative method for removing the old paint (e.g., alternative MeCl-free chemical stripper; mechanical stripping);
- Reduce exposure of all MeCl-containing paint strippers to the air;
- Optimize the application conditions when using MeCl-containing paint strippers to reduce the MeCl evaporation (e.g., use at lowest effective temperatures); and
- Practice proper storage and disposal of paint strippers containing MeCl to minimize unnecessary evaporative losses.

Rule 6H Requires Training For ALL Painters!

Rule 6H requires that any person who operates a spray gun on site complete initial hands-on and classroom training on (40 CFR 63.11173(f)):

- ❖ Proper selection, set up, and operation of spray guns;
- ❖ Proper spray techniques that minimize overspray;
- ❖ Routine operation of spray booths and other ventilated enclosures, including exhaust filter maintenance; and
- ❖ Compliance with the specific requirements of this rule.

Painters must complete refresher training on each of these topics every five years. Shop owners/operators must also maintain a record of each painter's training history with documentation showing that all of the required topics were covered in the completed training course(s).

For shops that use more than 1 ton of MeCl (approximately 180 gallons) in one calendar year, Rule 6H requires the development of a written MeCl Minimization Plan (40 CFR 63.11173(b)). However, most auto collision repair shops use much less than 1 ton MeCl annually, and therefore, will not be subject to these written MeCl Minimization Plan requirements.

What Records Must Be Kept for Documenting MeCl Use?

All shops that use **any amount** of MeCl must maintain the following information in their records (40 CFR 63.11177(e)):

- A list of all the MeCl-containing paint stripper products that are used;
- The MeCl content of each product used (e.g. Material Safety Data Sheet (MSDS), label, or supplier data sheet); and
- Amount of each product that is used in each calendar year (e.g., purchase receipts, supplier data, records of stripper usage, or engineering calculations).

What Must Shops Do To Comply with Rule 6H?

All shops must comply with the specific requirements previously described for spray coating and paint stripping activities. In addition, shops must also:

1. **Submit an Initial Notification** - All shops subject to the rule must provide initial notification of their spray coating and paint stripping activities to both GA EPD and the US EPA Region 4 office by the appropriate date shown in the table below.
2. **Achieve Full Compliance with Rule 6H** - All shops subject to the rule must fully implement the relevant spray coating, paint stripping, painter training, and recordkeeping requirements described in this fact sheet by the appropriate compliance date shown in the table below.
3. **Submit a Notification of Compliance Status** - All shops subject to the rule must provide notification of compliance status to both GA EPD and the US EPA Region 4 office by the appropriate date shown in the table below.
4. **Submit an Annual Notification of Changes Report, only if...** the information submitted in a previous notification has changed, or if you were out of compliance or "deviated" from the rule for a period of time. The Annual Notification of Changes Report is to be submitted to both GA EPD and the US EPA Region 4 office by March 1 following the year in which deviation occurred.

SBEAP has developed a Notification Form to assist shops in their notification and reporting requirements. This form and additional assistance are available by contacting the Georgia SBEAP at (404) 362-4569. You can also download this form from our web site at epd.georgia.gov/small-business-environmental-assistance-0.

5. **Keep and Maintain the Following Records on Site** - In addition to the documentation and records previously described, you must also maintain the following:

- Copies of all notifications submitted to GA EPD and the US EPA Region 4 office (40 CFR 63.11177(d));
- Records of any deviation from the requirements of the rule - including the date and time period of the deviation, description of the deviation, and the actions taken to correct it (40 CFR 63.11177(g)). These deviations should be reported to GA EPD/US EPA in the Annual Notification of Changes Report (see #4 above); and
- Records of all compliance assessments performed in support of the Notification of Compliance Status or Annual Notification of Changes Reports - this would include documenting the various paints/coatings that are used and, if appropriate, confirming that they do not contain the target HAPs (40 CFR 63.11177(h)).

What If the Paints I Use Do Not Contain the Target HAPs?

If your shop can demonstrate and certify that it spray applies NO coatings that contain a target HAP, then you may petition GA EPD for an exemption from the spray-coating requirements of Rule 6H. Because your paint supplier or jobber knows the product lines best, request their assistance to review the chemical ingredients to determine if your paints contain the target HAPs.

Summary of Compliance Dates

Rule 6H Requirements	Existing Source Constructed prior to September 17, 2007	New Source Constructed or reconstructed after September 17, 2007
Initial Notification (form submittal)	January 11, 2010	180 days after start up or July 7, 2008 (whichever is later)
Compliance with the Rule	January 10, 2011	At start up or January 9, 2008 (whichever is later)
Completion of Painter Training (records on-site)	180 days after hiring or January 10, 2011 (whichever is later)	180 days after hiring or July 7, 2008 (whichever is later)
Notification of Compliance Status (form submittal)	March 11, 2011	180 days after start up or July 7, 2008

How Do I Petition for An Exemption from the Spray Coating Requirements?

You must petition GA EPD for an exemption from Rule 6H spray coating requirements and provide information on the paint products that you use.

SBEAP has developed a Petition for Exemption Form to assist shops in preparing the petition for exemption. This form and additional assistance are available by contacting the Georgia SBEAP at (404) 362-4569. You can also download this form from our web site at epd.georgia.gov/small-business-environmental-assistance-0.

Important Information Regarding the Petition for Exemption:

You will **not** be officially exempt from the requirements of the rule until you receive approval from GA EPD, and there may be a period of time between submitting the petition and receiving the approval. So, you should continue to move forward in meeting the requirements of the rule until you receive the exemption approval.

If you perform MeCl paint stripping activities, you may still petition for an exemption from the Rule 6H spray coating requirements; however, you must submit the required notifications with your petition.

Is My Shop Required to Obtain a Permit from GA EPD?

The need for an Air Quality Permit issued by the GA EPD depends on the types and amounts of pollutants emitted from shop activities.

All facilities that emit pollutants to the air must comply with the Georgia RAQC. Collision repair operations have the potential to emit three types of regulated pollutants:

1. **Particulate matter (PM)** from sanding, blasting, and spray coating activities;
2. **Volatile organic compounds (VOCs)** from solvents used in surface prep and equipment cleaning activities, as well as in the coating formulations; and
3. **Other Hazardous air pollutants (HAPs)** besides those regulated by Rule 6H.

Most collision repair shops emit these regulated pollutants in amounts that are below established thresholds and are therefore, exempt from Georgia's air permitting requirements.

Even though a shop may not require a permit, all shops must comply with Georgia's RAQC. In addition to the Rule 6H requirements, Georgia's air quality regulations include a provision that generally prohibits the release of any pollutant in such a way as to cause harm to the environment or human health, or to interfere with the enjoyment of life or use of a property (RAQC Chapter 391-3-1-.02(2)(a)(1)).

For assistance in determining whether your shop is subject to air quality permitting requirements, please contact the Georgia SBEAP or GA EPD's Air Protection Branch at the numbers listed below.

All shops must be vigilant in minimizing and controlling the release of dusts and overspray generated by their collision repair activities!

Where Can I Go for More Help?

For assistance and information, contact the following:

Georgia Small Business Environmental Assistance Program: (404) 362-4569

Visit epd.georgia.gov/small-business-environmental-assistance-0 guidance materials and compliance forms related to Rule 6H.

Georgia EPD, Air Protection Branch, Air Toxics Unit: (404) 363-7067

For additional auto collision repair information, visit the following web sites:

US. EPA's Community Air Toxics' Collision Repair Campaign: www.epa.gov/collision-repair-campaign

US. EPA's Design for the Environment (DfE) Automotive Refinishing Project:

www.epa.gov/dfe/pubs/projects/auto

Coordinating Committee for Automotive Repair's (C-CAR) GreenLink Virtual Shops:

www.ccar-greenlink.org/welcome-to-the-ccar-greenlink-virtual-shops

Disclaimer: This fact sheet should be used as a general guide. If you need more information or have additional questions about the regulatory information presented in this document, contact the Georgia SBEAP at 404-362-4569.