

# Petition for Exemption

Paint Stripping and Miscellaneous Surface Coating Operations

Area Source Rule

40 CFR Part 63 Subpart HHHHHH (Parts 63.11169 – 63.11180)

In accordance with 40 CFR Part 63.11170(a)(2), an owner or operator of a motor vehicle or mobile equipment surface coating operation may petition the U.S. EPA Administrator for an exemption from the regulatory requirements of 40 CFR Part 63 Subpart HHHHHH, as they apply to those operations, if the owner or operator can demonstrate that the spray-applied coatings used by the facility do not contain target hazardous air pollutants (HAP).

As defined in 40 CFR 63.11180, coatings are "target HAP containing coatings" if they contain compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd) at concentrations greater than the following thresholds:

- If the compound is a carcinogen, the coating must contain more than 0.1% by mass of that individual target HAP to be considered a "target HAP containing coating."
- If the compound is not a carcinogen, the coating must contain more than 1.0% by mass of that individual target HAP to be considered a "target HAP containing coating."

Refer to the Material Safety Data Sheet for each coating to determine the above information.

## **Section 1. General Information**

| Company Name   |                  |     |  |  |
|--|------------------|-----|--|--|
| Mailing Address  | Telephone Number |     |  |  |
| City   | State            | Zip |  |  |
| Facility Location (if different from above):           |                  |     |  |  |
| Street Address   | _ County         |     |  |  |
| City   | State            | Zip |  |  |
|  |                  |     |  |  |
| Location where your compliance records are maintained: |                  |     |  |  |
| Street Address   | _County          |     |  |  |
| City   | State            | Zip |  |  |
|  |                  |     |  |  |

# Section 2. Describe your surface coating operation and explain why your facility qualifies for an exemption under 40 CFR 63.11170(a)(2). (For example: Our shop repairs automobile collision damage. We are seeking an exemption because we have stopped using target HAP containing coatings.)

#### Section 3. Description of Spray-Applied Coatings

In the table below please provide a description of the manufacturer(s) and product line(s) of the spray-applied coatings used at this facility. (For example: *ABC Paint Company, Pearl Tone Primer product line*).

| Manufacturer or Supplier | Product Line |
|--------------------------|--------------|
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#### Section 4. Certification Statement

I have consulted reliable analyses (e.g., material safety data sheets) of the coatings that are used in this facility and have determined that we do not spray apply the target HAP (hazardous air pollutant) containing coating as defined in 40 CFR 63.11180. I certify, under penalty of law, to the truth, accuracy, and completeness of the information provided in this petition. If circumstances change such that we intend to spray apply target HAP containing coatings in surface coating operations, we will submit the initial notification required by 40 CFR 63.11175 and will immediately comply with the requirements of Subpart HHHHHH (the National Emission Standard for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources), upon using target HAP containing coatings. The spray application of target HAP containing coatings in a surface coating operation voids any exemption that might be granted as a result of this petition.

Under 40 CFR 63.10(b)(3) you must keep a record of the approval of this request on site at your shop for a period of 5 years after the request is granted, or until you change your operation(s) to include spray application of target HAP containing coatings, whichever comes first.

Signature of Certifying Official

Date

Printed Name of Certifying Official

Title

## Section 5. Form Submittal

Submit the completed Petition for Exemption form by registered mail to the following regulatory officials:

Mr. Stephen Damaske Georgia Department of Natural Resources Environmental Protection Division Air Protection Branch 4244 International Parkway Suite 120 Atlanta, Georgia 30354 U.S. EPA Region IV Sam Nunn Atlanta Federal Center 61 Forsyth Street, S.W. Atlanta, Georgia 30303

If you are a small business with 100 employees or less and need help understanding the regulatory requirements for paint stripping and miscellaneous surface coating operations, please contact the following state small business assistance program:

Georgia Small Business Environmental Assistance Program 4244 International Parkway Suite 120 Atlanta, GA 30354 (470) 524-0645