
Methylene Chloride Paint Stripping Area Source NESHAP 40 Code of Federal Regulations (CFR) 63 Subpart HHHHHH (6H)

Summary of Requirements
September 2023

Do these regulations apply to my operation?

The *Methylene Chloride Paint Stripping - Area Source NESHAP* regulations apply to *Area Source*^a facilities that use chemical strippers containing methylene chloride (MeCl) to remove dried coatings, including but not limited to paint, enamel, varnish, shellac and lacquer from wood, metal, plastic and other substrates.

^a An **Area Source** is a source of Hazardous Air Pollutants (HAPs) that is not a major source (i.e., a Title V facility). An area source of HAP 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.

What is the intent behind these regulations?

MeCl (Chemical Abstract Service [CAS] number 75092) is one of 30 *Urban HAPs* identified by EPA. Urban HAPs are HAPs that have been deemed by EPA to pose the greatest threat to public health in urban areas because of their associated emissions. The intent of these regulations is to minimize MeCl emissions originating from Area Source facilities.

Compliance Requirements Summary

Facilities subject to this Area Source rule must implement management practices to minimize evaporative MeCl emissions. At a minimum, management practices must address/consider the following as they pertain to the facility's operation:

- Each application should be evaluated to ensure MeCl paint stripping is actually needed (as opposed to an alternative remedy such as re-coating a work piece without removing the existing coating).
- Other coating removal technologies should be evaluated as alternatives to MeCl paint stripping.
- Reduce exposure to the air of all paint strippers containing MeCl.
- Optimize application conditions to reduce MeCl evaporation during paint stripping operations (e.g., keeping temperatures as low as possible for heated MeCl paint stripping applications)
- Ensure MeCl paint stripping chemicals are properly stored (e.g., kept in sealed containers) and disposed.

Affected facilities that use more than one ton of MeCl per year must also...

- Develop and implement a written MeCl Minimization Plan (MeCl MP) designed to minimize MeCl use and emissions. At a minimum, the MeCl MP must address the above bulleted items. It must also be maintained on site at all times and reviewed on an annual basis.
- A placard or sign, outlining the MeCl MP, must be posted in each area where MeCl paint stripping operations are performed.

Compliance Dates

Facilities performing MeCl paint stripping must be in compliance with each of the requirements by the date of start-up. Existing facilities should comply with these requirements **immediately**.

Notification Requirements

Owners/operators of facilities subject to this Area Source rule must submit an Initial Notification to the to the Iowa DNR and to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI). Facilities in Linn or Polk County must also submit this notification to the appropriate county office.

- ☑ **Affected Sources** must submit the Initial Notification no later than 180 days after initial startup. This Initial Notification also serves as a *Notification of Compliance Status* provided the initial notification certifies compliance with this rule.

Initial Notifications must include the following information:

- ☑ The company name.
- ☑ The name, address, phone number, e-mail address, and signature of the owner/operator (or other certifying company official) certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all relevant standards and requirements of this rule.
- ☑ The physical address of the affected source.
- ☑ A statement indicating the facility is subject to this standard (40 CFR part 63, subpart HHHHHH).
- ☑ A brief description of facility operations and activities (such as the method(s) of paint stripping employed and type of substrates stripped).
- ☑ A statement indicating whether the facility will use more than one ton of MeCl after the compliance date.
- ☑ A statement indicating the facility is already in compliance with this rule or will be in compliance by the compliance date.

If any information in the Initial Notification, Notification of Compliance Status report, or a previous Annual Notification of Changes report has changed in the previous calendar year, an Annual Notification of Changes report must be submitted prior to March 1.

Record Keeping

Affected area sources must keep the following records to document compliance:

- ☑ An annual MeCl paint stripper usage log must be maintained at the facility. Records must include information on the MeCl content of each paint stripper and documentation verifying the facility's annual MeCl usage (e.g., Safety Data Sheets, manufacturer documentation, purchase records, and engineering calculations).
- ☑ Facilities that use more than one ton of MeCl must maintain a copy of their MeCl MP on site at all times. Records of annual MeCl MP reviews and updates must also be kept on file.
- ☑ Copies of any notifications and reports submitted to the Administrative Authority.

For more information or questions please contact:

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