EPA Requirements for Methylene Chloride Paint Stripping Operations

40 CFR Part 63, Subpart HHHHHH

August 2013

In January 2008, a new regulation was passed by the U.S. Environmental Protection Agency that affects facilities using paint stripping products containing methylene chloride (MeCl). This regulation is called the *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources.*

Who must comply?

Facilities whose potential to emit is below (or capped below) 25 tons per year (tpy) of combined hazardous air pollutants (HAP) and 10 tpy of any single HAP AND uses chemical strippers containing MeCl (CAS #00075-09-2) to remove dried paint (including, but not limited to paint, enamel, varnish, shellac and lacquer) from wood, metal, plastic and other substrates.

Exemptions - The following are exempt from this regulation:

- Paint stripping operations of military munitions or military munitions transport equipment;
- operations that take place at installations owned/operated by the various military and federal administrations;
- operations performed by individuals on their personal possessions or for others without receiving compensation;
- research and laboratory activities;
- quality control activities or
- operations subject to another NESHAP

How can I tell if the paint stripper contains MeCl?

You can determine if a product contains MeCl by reviewing the materials safety data sheets. If MeCl is present it will be listed in the MSDS usually in the *Composition* or *Ingredient* section (typically Section 2 of an MSDS, but MSDS' can vary so be sure to read the entire document).

Be careful! MeCl has many different names (Freon 30, dichloromethane, etc.), so when reviewing the MSDS also check for the Chemical Abstracts Service or CAS #75-09-2. If this number is listed, the product contains MeCl.

Switching products or using new ones that contain MeCl will make you subject to this regulation. Make sure new stripper product does not contain MeCl or make sure you are following the requirements outlined below upon startup.

What are the requirements?

Facilities that use paint stripping products that contain MeCl need to implement management practices to minimize the evaporative emissions including, at a minimum:

- evaluate each application to ensure there is a need for paint stripping,
- evaluate each MeCl paint stripping operation to ensure no alternative technology is available,
- reduce exposure of MeCl containing products to the air,
- optimize conditions at time of application to reduce evaporation, and
- practice proper storage and disposal of MeCl containing paint strippers.

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If you use more than 1 ton of MeCl annually, you must also do the following:

- Maintain copies of annual usage of paint strippers containing MeCl on site at all times,
- Develop and implement a written MeCl minimization plan and keep the plan on site, and
- Post a sign outlining the MeCl minimization plan in each area where MeCl containing paint stripping operations occur.

What is my deadline?

Your deadline is based on 1) the date you began paint stripping or 2) the date construction began at your facility to install paint stripping equipment (at facilities that previously did not perform these operations).

Start Date Operation or Construction	**Submit** ***Initial Notification***	**Meet Requirements**	**Submit** ***Notification of Compliance Status****
On or before 09/17/2007	01/11/2010	01/10/2011	03/11/2011
After 09/17/2007	within 180 days of start up	upon start up	within 180 days of start up

* Shops that started paint stripping operations prior to 9/18/2007 and could not meet all of the above requirements at the time the *Initial Notification* form was submitted will need to submit a *Notification of Compliance Status* by March 11, 2011.

Additional Reporting and Record Keeping

- ✓ If there are any changes in your compliance status during the calendar year, you need to submit an *Annual Notification of Changes Report* (by March 1).
- ✓ Keep all copies of forms and notifications submitted.
- ✓ Document MeCl evaluations.
- ✓ If applicable, maintain usage records for paint stripper products containing MeCl; written MeCl minimization plan and post required signs.
- ✓ Don't forget about the state air permitting requirements!

Contact the SBEAP at 1-800-780-7227 for more information.

Helping New York's Small Businesses understand and comply with environmental regulations.

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The information in this fact sheet is intended for general reference only; it is not a full and complete statement of the technical or legal requirements associated with the regulation.