

Comparison of 40 CFR 63 Subpart HHHHHH Requirements to 30 TAC 106.433 and 106.436 Requirements

Type	40 CFR 63 Subpart HHHHHH Requirements	30 TAC 106.433 Requirements	30 TAC 106.436 Requirements
Methylene Chloride Stripping	<p>§63.11173(a) and (b): (a) Each paint stripping operation that is an affected area source must implement management practices to minimize the evaporative emissions of MeCl. (b) Each paint stripping operation that has annual usage of more than one ton of MeCl must develop and implement a written MeCl minimization plan to minimize the use and emissions of MeCl.</p>	<p>§106.433: NA</p>	<p>§106.436: NA</p>
Operator Training	<p>§63.11173(e)(1): All painters must be certified that they have completed training that meets the requirements of §63.11173(f)</p>	<p>§106.433: NA</p>	<p>§106.436: NA</p>
Over Spray Filter Efficiency	<p>§63.11173(e)(2)(i): 98%</p>	<p>§106.433(6)(C): 95%</p>	<p>§106.436(7): 90%</p>
Spray Booths	<p>§63.11173(e)(2)(ii), (iii), and (iv): Complete motor vehicle or mobile equipment refinishing requires spray booths and preparation areas that are fully enclosed with a full roof and four complete sides or complete side curtains that is maintained under negative pressure. Spray booths and ventilated enclosures used to coat miscellaneous parts or vehicle sub assemblies must have a full roof at least three complete walls or side curtains and be operated so that air is drawn into the booth. Mobile ventilated enclosures that are used to perform spot repairs must be enclosed and , if necessary seal against the surface around the area being coated such that paint overspray is retained within the enclosure and directed to a paint overspray filter.</p>	<p>§106.433(6): dry filtered spray booth or work area with intake face velocity of more than 100 fpm</p>	<p>§106.436(5) and (6): Spray coating more than nine square feet shall be conducted in a totally enclosed filtered booth or spray area. Spray coating less than nine square feet shall be conducted in a dedicated preparation area exhausted through a stack or recirculated back into the shop after passing through a carbon adsorbtion system. The preparation area shall be equipped with a dry filter system.</p>
Application Equipment	<p>§63.11173(e)(3): HVLP, electrostatic, airless, air assisted airless or any other type of application equipment that has a transfer efficiency comparable to one of the listed application equipment types. See §63.11180 for Spray applied Coating Operations for application equipment types that are exempt from this requirement.</p>	<p>§106.433: NA</p>	<p>§106.436: HVLP, electrostatic or other methods demonstrated to provide equal or greater transfer efficiency 30 TAC 115.422 requires that 65% transfer efficiency must be met and states that HVLP is assumed to meet 65% transfer efficiency</p>

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Application Equipment Cleanup	<p>§63.11173(e)(4): Spraying solvent through the gun and capture of all solvent</p> <p>Disassembled gun cleaning in a container, flush cleaning and enclosed gun washers</p>	<p>§106.433: NA</p>	<p>§106.436(9): Enclosed gun cleaners, non enclosed gun cleaners with low vapor pressure solvents that drain to an enclosed reservoir, storage in closed containers</p>
Coating HAP Limits	<p>§63.11180: Target HAP are compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd). Target HAP containing coating means a spray-applied coating that contains any individual target HAP that is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) at a concentration greater than 0.1 percent by mass, or greater than 1.0 percent by mass for any other individual target HAP compound.</p>	<p>§106.433(7)(B): For non enclosed spray painting operations the VOC emission limits shall be no more than 240 lb/wk and 2000 lb/yr if the coatings contain greater than 0.1% by weight of chromates, lead, cadmium, selenium, strontium or cobalt</p>	<p>§106.436: NA</p>
Exemptions	<p>§63.11170(a)(3) and §63.11180: Facility maintenance operations are exempt from the requirements of this rule. Facility maintenance means, for the purposes of this subpart, 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. Facility maintenance also includes surface coating associated with the installation of new equipment or structures, and the application of any surface coating as part of janitorial activities. Facility maintenance includes the application of coatings to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs. Facility maintenance also includes 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. Facility maintenance does not include 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.</p>	<p>§106.433(4)(C): If emissions of VOC and exempt solvent are less than 0.25 lb/hr then the operation is exempt from the opacity limits in Condition No. 9, the spray booth and distance requirements in Condition Nos. 6 and 7, the recordkeeping requirements of condition No. 8 and the registration requirements in Condition No. 9</p>	<p>§106.436(2)(A) and (B): (A) Spray operations that use less than 1/2 pint of coatings and solvents per hour are exempt from all of the requirements of this section except for paragraphs (3), (4), (16), and (17) of this section. (B) Spray operations that use less than two gallons of coatings and solvents per week are exempt from all of the requirements of this section except for paragraphs (3), (4), (8), (11), (12), (14), (16), and (17) of this section unless additional controls are specified in §115.421 of this title (relating to Emission Specifications). Additionally, all overspray emissions must be vented through a filter system that meets the requirements of paragraph (7) of this section.</p>

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Notifications	<p>§63.11175: (a) Initial Notification. If you are the owner or operator of a paint stripping operation using paint strippers containing MeCl and/or a surface coating operation subject to this subpart, you must submit the initial notification required by §63.9(b). (b) Notification of Compliance Status.</p>	<p>§106.433: NA</p>	<p>§106.436: NA</p>
Reports	<p>§63.11176: (a) Annual Notification of Changes Report. (b) If you are the owner or operator of a paint stripping affected source that has not developed and implemented a written MeCl minimization plan in accordance with §63.11173(b) of this subpart, you must submit a report for any calendar year in which you use more than one ton of MeCl.</p>	<p>§106.433: NA</p>	<p>§106.436: NA</p>
Recordkeeping	<p>§63.11177 and 11178: (a) Certification that each painter has completed the training specified in §63.11173(f) (b) Documentation of the filter efficiency (c) Documentation from the spray gun manufacturer that each spray gun type not covered by this rule has a transfer efficiency equivalent to an HVLP gun (d) Copies of any notification submitted as required by §63.11175 and copies of any report submitted as required by §63.11176 (e) Records of paint strippers containing MeCl used for paint stripping operations (f) Maintain a record of your current MeCl minimization plan on site for the duration of your paint stripping operations.</p>	<p>§106.433(8): MSDS, daily coating and solvent usage, daily hours of operation and records of emissions in lb/hr, lb/week, and tons for the pervious 12-month period</p>	<p>§106.436(15): Records of coating and solvent purchases</p>