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Introduction to the Compliance Toolkit

This tool kit is designed to equip Georgia's auto collision repair industry with information and resources to comply with the *Paint Stripping and Miscellaneous Surface Coating Area Source Rule* (Rule 6H).

In December 2007, the U.S. Environmental Protection Agency proposed Rule 6H. The Georgia Small Business Environmental Assistance Program (SBEAP) recognized that thousands of small businesses would require information, training, and assistance to comply with Rule 6H. With the help of auto collision repair industry representatives, the Georgia SBEAP created the Georgia Auto Collision Repair Initiative or **GACRI**.

GACRI is a compliance assistance program for Georgia's auto collision repair shops. One part of this program is the Environmental Results Program or ERP. **The Auto Collision Repair ERP** will allow Georgia SBEAP to provide one-on-one compliance assistance to participating shops to evaluate their compliance status, offer assistance, and measure improvements made concerning Rule 6H requirements. In turn, participating shops will receive incentives. In the event of a complaint investigation by the Georgia Environmental Protection Division (EPD), EPD inspectors will contact SBEAP and your site will receive priority assistance. The main tool for gathering environmental performance as it relates to Rule 6H is the **Self-Evaluation Checklist**. See page 4 for information on the checklist.

For more information on the Auto Collision Repair ERP, contact the Georgia Small Business Environmental Assistance Program at (404) 362-4842 or toll free at (877) 427-6255.

Summary of Rule 6H

On January 9, 2008, the U.S. Environmental Protection Agency (EPA) promulgated federal regulations codified in 40 CFR Part 63, Subpart HHHHHH (i.e., "Rule 6H") to reduce air emissions from the following area sources:

- Paint stripping operations using methylene chloride (MeCl)-containing paint strippers;
- Motor vehicle and mobile equipment surface coating operations; and
- Miscellaneous surface coating operations using target hazardous air pollutant (HAP)-containing coatings (compounds of chromium, lead, manganese, nickel, or cadmium).

Rule 6H requires that area sources performing these activities (e.g., collision repair shops) implement certain air pollution minimization practices, as well as certify that all spray painters are adequately trained, provide notification to EPA, and maintain compliance records. These requirements are described in more detail in Section 4. The final 6H Rule is found in the Federal Register notice published January 9, 2008 (pages 1760-1768), and the web address is <http://www.epa.gov/fedrgstr/EPA-AIR/2008/January/Day-09/a24718.pdf>.

Compliance Dates

The date by which you should be in compliance with the requirements depends on whether your surface coating operation is considered a "new" or "existing" source.

A **new source** means the initial startup of the surface coating operation occurred after September 17, 2007.

An **existing source** means that the facility was engaged in surface coating on or before September 17, 2007, or the facility began the installation of surface coating equipment on or before this date.

Exemptions

Rule 6H does not apply to the following activities:

1. Surface coating or paint stripping performed on site at installations owned or operated by the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State), the National Aeronautics and Space Administration, or the National Nuclear Security Administration.
2. Surface coating or paint stripping of military munitions, as defined in §63.11180, Manufactured by or for the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State) or equipment directly and exclusively used for the purposes of transporting military munitions.
3. Surface coating or paint stripping performed by individuals on their personal vehicles, possessions, or property, either as a hobby or for maintenance of their personal vehicles, possessions, or property **provided they coat no more than two per year**. Rule 6H also does not apply when these operations are performed by individuals for others without compensation. However, an individual who spray applies surface coating to **more than two** motor vehicles or pieces of mobile equipment per year is subject to Rule 6H pertaining to motor vehicles and mobile equipment, regardless of whether compensation is received.
4. Surface coating or paint stripping that meets the definition of research and laboratory activities.
5. Surface coating or paint stripping that meets the definition of quality control activities.
6. Surface coating or paint stripping activities that are covered under another area source National Emission Standard for Hazardous Air Pollutants (NESHAP) regulation.

Next Steps. If your shop conducts any one of the operations listed in the rule Overview and does not meet the criteria listed in the rule Exemptions, then you must comply with the requirements of Rule 6H. ***Use this Self-Evaluation Checklist form and associated tools to guide you through compliance with Rule 6H.***

Self-Evaluation Checklist Tool

Why was the Self-Evaluation Checklist developed?

This checklist was developed in cooperation with the GACRI stakeholder group as one of many tools made available to collision repair shops to inform and assist owners and operators in meeting the requirements of Rule 6H.

Is the Self-Evaluation Checklist required by Rule 6H?

Rule 6H does not require that this particular self-evaluation checklist be used; **however...**

Rule 6H does require that you implement specific air emission minimization practices into your paint stripping and spray coating operations. It also requires that you maintain a record of all compliance assessments that are performed at your shop in assuring that each of the required practices are implemented.

This Self-Evaluation Checklist was developed as a tool for collision repair shops in performing these compliance assessments, allowing you to evaluate your current operations against the requirements of Rule 6H. The completed checklist can also be used as documentation of the assessment.

Each of the following sections provide instructions for performing the self-assessment and completing the checklist. The instructions are titled to be consistent with the various sections and questions on the checklist form.

Note that certain questions are denoted as "for ERP use only", and only required to be answered on the checklist form by shops participating in the GACRI ERP.

For more detailed technical guidance on how to comply with Rule 6H, you are encouraged to review the companion document, *Environmental Compliance Handbook for Georgia's Auto Collision Repair Industry*. You should also contact SBEAP at 404/362-4842 for additional technical assistance in completing this checklist or meeting the requirements of Rule 6H.

Checklist Instructions

1. **Make a copy of the original, blank Self-Evaluation Checklist form** to use for the assessment. Keep the original form in your files to use for future evaluations.
2. **Date.** Be sure to write in the date the self-assessment was performed.
3. **ERP ID Number (for ERP use only).** If your shop is participating in the ERP, you should have received an identification number from SBEAP. If you are a participant and do not know your ERP ID number, contact your assigned SBEAP technical representative or call the SBEAP front desk at 404/362-4842.

If you are not a participant in the GACRI ERP, you may leave this line blank.

4. **SBEAP Customer ID Number.** If you are working with SBEAP in performing this assessment or if you have received assistance from SBEAP in the past, you will have a Customer ID number. If you do not know your Customer ID number, contact your assigned SBEAP technical representative or call the SBEAP front desk at 404/362-4842.

If your shop received assistance from SBEAP in performing the assessment and completing the self-evaluation checklist, please indicate by checking the **SBEAP Assistance** box.

5. **Checklist Completed by.** Identify who will be responsible for performing the assessment and completing the checklist. This person may be the owner or operator of the shop, or another person who is highly familiar with all materials that are used, as well as with all operations of the shop. This person should also have access to certain records that are necessary for completing the checklist. These records include:
 - Material purchase records for the current and previous calendar year;
 - Material safety data sheets (MSDSs) or other product specification documents for all stripping and coating materials used; and
 - Other records that are specifically required by Rule 6H to be maintained on site (these are described in the checklist).

General Site Information. Self-explanatory.

Automotive Refinishing Operations. Self-explanatory.

Section A: Paint Stripping Activities and Requirements

Question A.1. Does your company perform paint stripping using methylene chloride (MeCl) for the removal of dried paint from wood, metal plastic, and other surfaces?

1. Inventory all paint stripping materials that have been purchased in the current and prior years, as well as others that may be present in your shop's supplies.
2. Review the contents of those materials to determine whether they contain MeCl. You may use MSDSs or other product specification documents provided by the manufacturer or supplier. This information may also be available on the container labeling.

If you do not have this information and are unsure of whether a stripping product contains MeCl, contact the manufacturer or supplier.

Be sure to refer to the Environmental Compliance Handbook for additional information on how to inventory and evaluate your shop's paint stripping materials for the presence of MeCl.

3. If you have MeCl-containing paint stripping materials on site, answer 'Yes' and continue to evaluate your process against the remaining questions in Section A.

If you can ascertain that no MeCl-containing strippers are used at your site, nor are they present in your supplies, answer 'No' to Question A.1 and skip to Section B of the Checklist.

Questions A.2 through A.8. If you use or have MeCl-containing stripping products on site, you must evaluate your paint stripping activities against these questions. To be compliant with Rule 6H, you must be able to answer 'Yes' to all questions indicated as a 'Requirement'.

Be sure to review the Environmental Compliance Handbook for additional information on how to assure that emissions of MeCl from your operations are minimized and that your shop is in compliance with Rule 6H in this respect.

Note that Questions A.5 and A.7 are for ERP use only.

If you must answer 'No' to any one of these questions, you must develop a plan by identifying the necessary actions and schedule for correcting the practices within your paint stripping operation in order to come into compliance with Rule 6H. You must also document this corrective action plan for each requirement in a Return To Compliance