



NESHAP Subpart 6H for Commercial Vehicles and Sign Business Segment

Many of our customers are asking questions about a new rule or regulation from the Environmental Protection Agency (EPA). What is this rule and what does it mean to AkzoNobel and to our customers?

What is this rule?

This rule is referred to by many names:

- **National Emission Standard for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations**
- Subpart HHHHHH or Subpart 6H
- Area Source Rule for Paint Stripping and Miscellaneous Surface Coating Operations

Who does this rule apply to?

The rule applies to facilities that conduct any or all of the following operations:

- Paint stripping operations that use chemical strippers containing methylene chloride. Since AkzoNobel does not supply methylene chloride, this part is not relevant to us. However, some of our customers may use methylene chloride from another supplier.
- Spray application of coatings to assembled motor vehicles and mobile equipment for the purposes of finishing or refinishing.
- Spray application of coatings that contain target HAPs (see below) to miscellaneous parts and products made of metal, plastic, or a combination of metal and plastic.

This rule does not apply to large facilities that operate under a Title V Clean Air Act Permit.

What are target HAPs and coatings that contain target HAPs?

For purposes of this rule, target HAPs identified are chromium, lead, manganese, nickel, and cadmium. The rule defines "target HAP containing coatings" as spray-applied coatings that contain any target HAP compound that is reportable on an MSDS.

Are all operations that paint metal or plastic parts covered by this rule?

Yes, all operations that coat metal and plastic parts are covered by this rule. However, if a facility can document that it does not spray apply target HAP containing coatings, it can be considered exempt.

How do I know if my customer uses Target HAP containing coatings?

Very few AkzoNobel Commercial Vehicle products contain Target HAPs. Table 1 provides a list of products that contain target HAPs. Compare your customer's purchase history with AkzoNobel Car Refinishes to this list. You can also check section 3 of the MSDS for target HAPs listing. **Ultimately, the customer must independently evaluate its own operations and its use of products that may contain target HAPs in order to ensure compliance with NESHAP Subpart 6H**

What should I do if my customer uses Target HAP containing coatings?

You should work with product management to identify alternative products and offer those products to your customer.

What is my customer required to do next?

If your customer does not use any Target HAP containing coatings, then the facility is not subject to the rule and no action is required. If your customer uses target HAP containing coatings and a substitution is not possible, then the customer should complete and submit the initial notification form by January 9, 2010. Table 2 provides a reference to the EPA Region for each state, along with where the completed forms must be sent. Addresses for the EPA Regional offices and the appropriate state offices are provided in Table 3 and 4 respectively.

NOTE: AkzoNobel employees are not to complete these forms on our customer's behalf.

What if my customer will continue to use Target HAP containing products?

The owner/operator of the facility should further evaluate their obligations to achieve full compliance with this rule. If a customer is not able to remove all target HAP containing coatings from its operation, it must eventually comply with all of the requirements of NESHAP Subpart 6H, such as:

- annual certifications of compliance,
- painter training,
- conduct all spray operations inside spray booths,
- use spray equipments that meets stated specifications,
- have 98% particulate capture efficient booth filters, and
- follow requirements for spray gun cleaning.

Full compliance with the rule is required by January 10, 2011. **In the end, the customer must evaluate its own processes and all of the product it uses, which may contain target HAPs, to assess the target HAPs content of those products and determine how to comply with the rule.**

Is additional information available?

Additional information and resources are available by contacting the Car Refinishes Regulatory Affairs Department.

Diane Nash 248.637.8532 or,
Kim Shannon 248.637.8505

Other resources are being developed for use by the automobile refinish industry by EPA Regional Offices; State and Local agencies, including Small Business Assistance offices; trade associations; trade publications.



Table 1
Commercial Vehicle and Sign Products Subject to
Area Source Rule, Subpart 6H

CV Products			
SAP Item #	Brand	Material description	Target HAP
321181	CV	SCV W-PRIM CR NA 1GL	Chromium compound
391880	CV	SCV ABPQ10RV RM FLNA93266 NA 1GL	Nickel compound
391924	CV	SCV ABPQ10RV RM FLNA93291 NA 1GL	Nickel compound
391618	CV	SIK BT WB 450 UBC COATING NA 200L	Chromium compound
391619	CV	SIK BT WB 450 UBC COATING NA 20L	Chromium compound

Sign Products			
SAP Item #	Brand	Material description	Target HAP
354671	Sign	SIG GG W-PRIM NA 1GL	Chromium compound
386394	Sign	SIG GG MM 923 NA 1L	Nickel compound
399867	Sign	SIG GGBC MM 431 NA 1L	Nickel compound



Table 2
Notification for Area Source Rule,
Subpart 6H

State	Abbreviation	EPA Region	Who to Notify for Exemption or Notification
Alabama	AL	IV (4)	Regional Office
Alaska	AK	X (10)	Regional Office
American Samoa	AS	IX (9)	Regional Office
Arizona	AZ	IX (9)	Regional Office
Arkansas	AR	VI (6)	Regional Office
California	CA	IX (9)	Regional Office
Colorado	CO	VIII (8)	Regional Office/Optional to send to State Air Agency
Connecticut	CT	I (1)	Regional Office
Delaware	DE	III (3)	Regional Office/Optional to send to State Air Agency
District of Columbia	DC	III (3)	Regional Office/Optional to send to State Air Agency
Florida	FL	IV (4)	Regional Office
Georgia	GA	IV (4)	State Air Agency and copy to Regional Office
Guam	GU	IX (9)	Regional Office
Hawaii	HI	IX (9)	Regional Office
Idaho	ID	X (10)	Regional Office
Illinois	IL	V (5)	Regional Office/Optional to send to State Air Agency
Indiana	IN	V (5)	Regional Office/Optional to send to State Air Agency
Iowa	IA	VII (7)	Regional Office and State Air Agency
Kansas	KS	VII (7)	Regional Office and State Air Agency
Kentucky	KY	IV (4)	State Air Agency and copy to Regional Office
Louisiana	LA	VI (6)	Regional Office
Maine	ME	I (1)	Regional Office
Maryland	MD	III (3)	State Air Agency and copy to Regional Office
Massachusetts	MA	I (1)	Regional Office
Michigan	MI	V (5)	Regional Office/Optional to send to State Air Agency
Minnesota	MN	V (5)	Regional Office/Optional to send to State Air Agency
Mississippi	MS	IV (4)	State Air Agency and copy to Regional Office
Missouri	MO	VII (7)	Regional Office and State Air Agency
Montana	MT	VIII (8)	Regional Office/Optional to send to State Air Agency
Nebraska	NE	VII (7)	Regional Office and State Air Agency
Nevada	NV	IX (9)	Regional Office
New Hampshire	NH	I (1)	Regional Office
New Jersey	NJ	II (2)	Regional Office
New Mexico	NM	VI (6)	Regional Office
New York	NY	II (2)	Regional Office
North Carolina	NC	IV (4)	State Air Agency and copy to Regional Office
North Dakota	ND	VIII (8)	Regional Office/Optional to send to State Air Agency
Ohio	OH	V (5)	Regional Office/Optional to send to State Air Agency
Oklahoma	OK	VI (6)	Regional Office
Oregon	OR	X (10)	State Air Agency and copy to Regional Office
Pennsylvania	PA	III (3)	Regional Office and copy to State Air Agency
Puerto Rico	PR	II (2)	State Air Agency and copy to Regional Office
Rhode Island	RI	I (1)	Regional Office
South Carolina	SC	IV (4)	State Air Agency and copy to Regional Office
South Dakota	SD	VIII (8)	Regional Office/Optional to send to State Air Agency
Tennessee	TN	IV (4)	Regional Office
Texas	TX	VI (6)	Regional Office
Utah	UT	VIII (8)	Regional Office/Optional to send to State Air Agency
Vermont	VT	I (1)	Regional Office and State Air Agency
Virgin Islands	VI	II (2)	State Air Agency and copy to Regional Office
Virginia	VA	III (3)	State Air Agency and copy to Regional Office
Washington	WA	X (10)	Regional Office and State Air Agency
West Virginia	WV	III (3)	Regional Office/Optional to send to State Air Agency
Wisconsin	WI	V (5)	Regional Office/Optional to send to State Air Agency
Wyoming	WY	VIII (8)	Regional Office/Optional to send to State Air Agency



*Table 3
Addresses for Submission of
Notifications to EPA Regional Offices*

EPA Region	Address to Submit Notification/Exemption for the Regional Office
I (1)	EPA, Director Air, Pesticides and Toxic Division 1 Congress Street Suite 1100 Boston, MA 02114-2023 Attn: Air Compliance Clerk
II (2)	EPA, Director Division of Enforcement and Compliance Assistance 290 Broadway New York, NY 10007-1866 Attn: Chief Air Compliance Office
III (3)	EPA, Director Air Protection Division 1650 Arch Street Philadelphia, PA 19203
IV (4)	EPA, Director Air, Pesticides and Toxic Management Division Atlanta Federal Center 61 Forsyth Street Atlanta, GA 30303-3104
V (5)	EPA, Director Air and Radiation Division 77 West Jackson Blvd. Chicago, IL 60604-3507 Attn: Air Enforcement AE17J Branch
VI (6)	EPA, Director Air, Pesticides and Toxics 1445 Ross Avenue Dallas, TX 75202-2733 Attn: 6EN-AT
VII (7)	EPA, Director Air and Waste Management Division 901 N. 5 th Street Kansas City, KS 66101
VIII (8)	EPA, Director Air and Toxics Technical Enforcement Program Office of Enforcement, Compliance and Environmental Justice 1595 Wynkoop Street Denver, CO 80202-1129
IX (9)	US EPA 75 Hawthorne Street San Francisco, CA 94105 Attn: Joe Wesersend (AIR-5)
X (10)	EPA, Director Office of Air, Waste and Toxics 1200 6 th Ave. Seattle, WA 98101



*Table 4
Addresses for Submission of
Notifications to State or Local Offices*

State	Address to Submit Notification/Exemption for Individual State (s)
Alabama	No state notifications necessary for this region.
Alaska	No state notifications necessary for this region.
American Samoa	No state notifications necessary for this region.
Arizona	No state notifications necessary for this region.
Arkansas	No state notifications necessary for this region.
California	No state notifications necessary for this region.
Colorado	Colorado Department of Public Health and Environment Air Pollution Control Division 4300 Cherry Creek Drive South Denver, CO 80246
Connecticut	No state notifications necessary for this region.
Delaware	Delaware Department of Natural Resources and Environmental Control Air Quality Management Section 156 South State Street Dover, DE 19901
District of Columbia	District of Columbia Department of the Environment Air Quality Division 51N Street, N.E. Washington, D.C. 20002
Florida	No state notifications necessary for this region.
Georgia	Georgia Department of Natural Resources Environmental Protection Division Air Protection Branch 4244 International Parkway Suite 120 Atlanta, GA 30354
Guam	No state notifications necessary for this region.
Hawaii	No state notifications necessary for this region.
Idaho	No state notifications necessary for this region.
Illinois	Illinois Environmental Protection Agency Bureau of Air 1021 North Grand Avenue East Springfield, IL 62794
Indiana	Indiana Department of Environmental Management Office of Air Quality 100 N. Senate Avenue Indianapolis, IN 46206

Iowa	Iowa Department of Natural Resources Air Quality Bureau 7900 Hickman Road, Suite I Windsor Heights, IA 50324
Kansas	Kansas Department of Health and Environment Bureau of Air and Radiation 1000 SW Jackson, Suite 310 Topeka, KS 66612
Kentucky	Kentucky Department of Environmental Protection Division of Air Quality 200 Fair Oaks Lane, First Floor Frankfort, KY 40601
Louisiana	No state notifications necessary for this region.
Maine	No state notifications necessary for this region.
Maryland	Maryland Department of the Environment Air and Radiation Management Administration 1800 Washington Blvd., Suite 730 Baltimore, MD 21230
Massachusetts	No state notifications necessary for this region.
Michigan	Michigan Department of Environmental Quality Air Quality Division Constitution Hall 525 West Allegan Street Lansing, MI 48909
Minnesota	Minnesota Pollution Control Agency Air Quality Section 520 Lafayette Road St. Paul, MN 55155
Mississippi	Mississippi Department of Environmental Quality Office of Pollution Control, Air Division 515 Amite Street Jackson, MS 39201
Missouri	Missouri Department of Natural Resources Division of Environmental Quality Air Pollution Control Program P.O. Box 176 Jefferson City, MO 65102
Montana	Montana Department of Environmental Quality Air Resources Management Bureau 1520 E. Sixth Avenue Helena, MT 59620
Nebraska	Nebraska Department of Environmental Quality Air Quality Section 1200 P.O. Box 98922 Lincoln, NE 68509
Nevada	No state notifications necessary for this region.

New Hampshire	No state notifications necessary for this region.
New Jersey	No state notifications necessary for this region.
New Mexico	No state notifications necessary for this region.
New York	No state notifications necessary for this region.
North Carolina	North Carolina Department of Environmental and Natural Resources Division of Air Quality 1641 Mail Service Center Raleigh, NC 27699
North Dakota	North Dakota Department of Health Division of Air Quality 918 East Divide Avenue, 2 nd Floor Bismarck, ND 58501
Ohio	Ohio Environmental Protection Agency Division of Air Pollution Control Lazurus Government Center 122 South Front Street Columbus, OH 43215
Oklahoma	No state notifications necessary for this region.
Oregon	Oregon Department of Environmental Quality Air Quality Division 811 SW Sixth Avenue, 11 th Floor Portland, OR 97204
Pennsylvania	Allegheny County Health Department (for Pennsylvania) Air Quality Program 3333 Forbes Ave. Pittsburgh, PA 15213
Puerto Rico	Puerto Rico Environmental Quality Board Air Program 431 Avenida Ponce de Leon Hata Rey, Puerto Rico 00918
Rhode Island	No state notifications necessary for this region.
South Carolina	South Carolina Department of Health and Environmental Control Bureau of Air Quality 2600 Bull Street Columbia, SC 29201
South Dakota	South Dakota Department of Environmental and Natural Resources Air Quality Program Joe Foss Building 523 E. Capitol Pierre, SD 57501
Tennessee	No state notifications necessary for this region.
Texas	No state notifications necessary for this region.
Utah	Utah Department of Environmental Quality Division of Air Quality 150 North 1950 West Salt Lake City, UT 84114

Vermont	Vermont Department of Environmental Quality Air Pollution Control Division 103 South Main Street Building 3 South Waterbury, Vermont 05671
Virgin Islands	Virgin Islands Department of Planning and Natural Resources Division of Environmental Protection 45 Mars Hills Frederiksted St. Croix, U.S. Virgin Islands 00841
Virginia	DEQ of Virginia P.O. Box 1105 Richmond, VA 23218 Attn: Patti Procise
Washington	Washington Department of Ecology Air Quality Program 300 Desmond Drive Lacey, WA 98503
West Virginia	West Virginia Department of Environmental Protection Division of Air Quality 601 57 th Street, S.E. Charleston, WV 25304
Wisconsin	Wisconsin Department of Natural Resources Bureau of Air Management 101 S. Webster Street AM/7 Madison, WI 53707
Wyoming	Wyoming Department of Environmental Quality Air Quality Division Herschler Building 122 W. 25 th Street Cheyenne, WY 82002