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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.***