

Area Source Rule for Paint Stripping and Miscellaneous Surface Coating Operations

Appendix A: Requirements for Paint Stripping Operations

What are the requirements for paint stripping?

Paint stripping operations must minimize the emissions of methylene chloride (MeCl) through the following management practices:

- evaluate each application for the need to remove paint (e.g., can part be re-coated)
- evaluate each application for alternatives to using MeCl
- reduce exposure of MeCl strippers to air
- optimize conditions to reduce evaporation (e.g., if heating, use lowest possible temperature)
- use proper storage and disposal techniques

What records do I need to maintain?

If you use more than one ton (2,000 pounds) of MeCl in one calendar year, then you must write up your plan to minimize emissions and post copies in all areas of your facility where stripping with MeCl occurs. If you use one ton or less of MeCl, then you are obligated to follow a minimization plan but do not need to have a written plan. A facility should review their minimization plan annually and update it as needed.

To demonstrate your usage of MeCl, you must keep a record of:

- materials used that contain MeCl
- the MeCl content for each material—a MSDS or supplier data sheet is sufficient along with amounts of each material used—purchase receipts, supplier data, or calculations are acceptable methods

Also be sure to keep all records of updated minimization plans as well as any time your operations do not meet the requirements of the rule—called a deviation.

What specific reporting requirements apply?

There are a few reports specific to paint stripping operations.

- ⇒ **Initial Notification:** Paint stripping operations must indicate whether they will use more than one ton of MeCl per year by the compliance due date.
- ⇒ **Notification of Compliance Status:** Those facilities using more than one ton of MeCl per year must certify that a written plan was developed and is being implemented.
- ⇒ **Notification of Changes Report:** If MeCl use increases above one ton in a calendar year, the source must submit a changes report by March 1 and then develop a written plan by December 31 of the next calendar year. After that, a notification of compliance status is due by March 1 of the following calendar year.

For example, if usage increased during 2012, a notification of changes report would have been due March 1, 2013, the written plan would have been due by December 31, 2013, and a notification of compliance status would have been due March 1, 2014.