

# Area Source Rule for Paint Stripping and Miscellaneous Surface Coating Operations

## Appendix B: Requirements for Motor Vehicle and Mobile Equipment Surface Coating Operations

### What type of vehicles qualify as motor vehicles and mobile equipment?

Mobile equipment includes just about any type of equipment that may be driven or pulled along a roadway. The following definitions are taken directly from the rule:

*“Motor vehicle means any self-propelled vehicle, including, but not limited to, automobiles, light duty trucks, golf carts, vans, and motorcycles.”*

*“Mobile equipment means any device that may be drawn and/or driven on a roadway including, but not limited to, heavy-duty trucks, truck trailers, fleet delivery trucks, buses, mobile cranes, bulldozers, street cleaners, agriculture equipment, motor homes, and other recreational vehicles (including camping trailers and fifth wheels).”*

### What are the requirements for motor vehicle and mobile equipment surface coating?

Surface coating operations must meet the following practices:

1. Certify that all spray painters have completed training in proper spray-application techniques and set-up and maintenance of the spray equipment.
2. Apply spray coatings in a spray booth, prep station or mobile enclosure that meets the requirements:
  - Use dry filters that achieve a minimum of 98% collection efficiency **or** use a water wash booth.
  - Full vehicles must be contained within a booth having four full walls (or side curtains) and a roof that is operated at negative pressure, or you can use a downdraft booth that is operated at no more than 0.05 inches water gauge with positive pressure.
  - Vehicle parts must be contained within a booth having three sides and a roof. Openings for conveyors are allowed.
  - Spot repair equipment must enclose and seal the area being repaired, such that emissions are captured and directed to a filter system.
3. Use one of the allowed spray application technologies:
  - high volume, low pressure (HVLP)
  - electrostatic
  - airless
  - air-assisted airless
  - any technology approved by EPA with equivalent transfer efficiency
4. Use a spray gun cleaning operation that does not spray solvent and waste coatings outside the collection container. Suggested alternatives include:
  - hand cleaning
  - flushing gun with solvent
  - fully enclosed gun cleaner

There are a few exceptions to these requirements. The listed spray technology is not required when painting is performed by students and instructors at a paint training center or when coating aerospace vehicles. Painter certification is not required for students under the supervision of a certified instructor.



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## What if a vehicle does not fit within a booth?

The definition of facility maintenance has been used to exclude many pieces of equipment that might not fit in a booth. The following excerpt from the rule's definition explains the exclusion for large vehicles:

*"[...] 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."*

## When must all painters be trained?

For new sources, all painters must be trained within 180 days of their starting date or July 7, 2008, whichever is later. At existing sources, all painters must be trained within 180 days of their starting date or by January 10, 2011, whichever is later. All painters must receive refresher training every five years.

## What elements must be covered in the painter training program?

All personnel that will spray-apply coatings in your facility must have a certification that they have received training that meets the requirements of this rule. The training program must include:

- spray equipment selection, set-up, and operation
- optimum spray techniques for different coating types, for best transfer efficiency and minimal overspray
- routine booth and filter maintenance, filter selection and installation
- compliance with the requirements of the rule

## What must be included in the painter training certification?

The owner or operator must certify the following items related to painter training requirements:

- list of personnel who require training, including name and job description
- dates of hands-on and classroom instruction, and elements completed at each
- description of methods used at completion of training to measure successful completion for each element

## What records do I need to maintain?

The following records must be maintained for a total of five years. Keep them on site for at least the first 2 years, but after that they may be located off site:

- painter training certifications
- documentation of booth filter collection efficiency
- US EPA approval for alternate spray technologies used
- copies of all notifications and reports submitted to US EPA
- records of any time operations do not meet the requirements of the rule—called a deviation

## What specific reporting requirements apply?

When making a notification that your operation is in compliance with the rule—whether at the initial notification or the notification of compliance status— be sure to include the date by which you were in compliance for each element of the rule.

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