

Area Source Rule for Paint Stripping and Miscellaneous Surface Coating Operations

Appendix C: Requirements for Miscellaneous Surface Coating Operations

What operations are included as miscellaneous surface coatings for this rule?

The primary focus of this rule is on the spray-application of surface coatings to plastic and/or metal parts only. The following definition from the rule explains what operations are included:

“Miscellaneous surface coating operation means the collection of equipment used to apply surface coating to miscellaneous parts and/or products made of metal or plastic, including applying cleaning solvents to prepare the surface before coating application, mixing coatings before application, applying coating to a surface, drying or curing the coating after application, and cleaning coating application equipment, but not plating. A single surface coating operation may include any combination of these types of equipment, but always includes at least the point at which a coating material is applied to a given part. A surface coating operation includes all other steps (such as surface preparation with solvent and equipment cleaning) in the affected source where HAP are emitted from the coating of a part. The use of solvent to clean parts (for example, to remove grease during a mechanical repair) does not constitute a miscellaneous surface coating operation if no coatings are applied. A single affected source may have multiple surface coating operations. Surface coatings applied to wood, leather, rubber, ceramics, stone, masonry, or substrates other than metal and plastic are not considered miscellaneous surface coating operations for the purposes of this subpart.”

What are the requirements for miscellaneous surface coating operations?

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 or prep station that meets the following requirements:
 - Use dry filters that achieve a minimum of 98% collection efficiency **or** use a water wash booth.
 - Plastic and/or metal parts must be contained within a booth having three sides and a roof. Openings for conveyors are allowed.
- 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.

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. That training program must include:

- spray equipment selection, set-up, and operation
- optimum spray techniques for different types of coatings, 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 in 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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