

Training Requirements for The Paint Stripping and Miscellaneous Surface Coating

Area Source Rule **Subpart HHHHHH**
40 CFR 63.11169 – 63.11180

This is NOT an official EPA document. You can consult 73 FR 1738, pg. 1762, section 63.11173(f)(2)(i)-(iv) for more information.

All painters who apply coatings at subject facilities must be certified that they have completed a training program that addresses the proper spray application of surface coatings and the proper setup and maintenance of spray equipment.

- After July 7, 2008, new employees at new sources have 180 days after hire to complete training.
- Employees at existing sources must complete by the compliance date (January 10, 2011)
- Refresher training, at least once every five years following initial training date is required
- Owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required are not required to provide the initial training to these painters.
- Owners or operators of subject facilities are required to maintain a list of all current personnel by name and job description who are required to be trained.

The minimum requirements for training and certification are described below:

1. A description of the methods, such as testing, to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training.
2. Hands-on *and* classroom instruction that addresses, at a minimum, the following the topics:
 - a. Hands-on *and* classroom instruction Routine spray booth and filter maintenance, including filter selection and installation.
 - b. Hands-on *and* classroom instruction on Spray Gun operation including:
 - Spray gun equipment selection,
 - Set up, and operation,
 - Measuring coating viscosity,
 - Selecting the proper fluid tip or nozzle,
 - Achieving the proper spray pattern,
 - Achieving the proper air pressure and volume,
 - Achieving the proper fluid delivery rate.
 - c. Hands-on *and* classroom instruction on Spray Technique including:
 - Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray,
 - Maintaining the correct spray gun distance and angle to the part,
 - Using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.

- d. Classroom instruction on what is necessary for environmental compliance with the requirements of the NESHAP, Subpart HHHHHH, Paint Stripping and Miscellaneous Surface Coating for Area Sources
- Install/operate filter technology on all spray booths/stations/enclosures to achieve at least 98% capture efficiency.
 - Spray booths/stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed and ventilated at negative pressure or up to 0.05 inches water gauge positive pressure for booths that have seals on all doors and other openings and an automatic pressure balancing system.
 - Spray booths/stations used to coat miscellaneous parts or products or vehicle subassemblies must have a full roof, at least three complete walls or side curtains, and ventilated so that air is drawn into the booth.
 - Spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless or air-assisted airless spray gun, or an equivalent technology.
 - Paint spray gun cleaning must be done so that an atomized mist or spray of the cleaning solvent is not created outside a container that collects used gun cleaning solvent.

Region 10 Regulatory Contact:
Heather Valdez, 206-553-6220, valdez.heather@epa.gov