



State of Ohio Environmental Protection Agency

Southwest District

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Bob Taft, Governor
Bruce Johnson, Lt. Governor
Joseph P. Koncelik, Director

Owner/Operator:

On January 31, 2006, the Director of the Ohio Environmental Protection (Ohio EPA) adopted new rule 3745-21-18 of the Ohio Administrative Code (OAC). The new rule applies to all commercial motor vehicle and mobile equipment refinishing operations located in Butler, Clark, Clermont, Greene, Hamilton, Miami, Montgomery, and Warren Counties. This rule does not apply to shops that emit less than 10 pounds of volatile organic compounds (VOC) per day and verify emissions through daily records per OAC rule 3745-15-05(E), i.e., "de minimis."

Commercial motor vehicle and mobile equipment refinishing operations are defined as any company or individual, other than the original manufacturer, that applies a coating containing VOC as a pretreatment, primer, sealer, base coat, clear coat or topcoat to mobile equipment for commercial purposes. This includes anyone who paints or refinishes automobiles, trucks, trailers, campers, farm equipment, construction equipment, camper shells, or anything capable of being driven or pulled by a motor vehicle.

This new rule became effective as of February 10, 2006. The compliance date for the operational requirements is by April 11, 2006. The rule also requires each affected owner and operator of a commercial motor vehicle and mobile equipment refinishing shop to notify Ohio EPA that they: 1.) use high efficiency painting equipment; 2.) have painting personnel properly trained to use this equipment; and 3.) clean spray guns using techniques to minimize solvent evaporation. This notification is due by **June 11, 2006**.

For your convenience, I have attached a standardized notification form which you may use to fulfill your reporting obligation. Feel free to use the attached form or submit your own notification report.

If your shop is located in **Butler, Clermont, Hamilton or Warren** County, then mail your completed notification form to:

Hamilton County Department of Environmental Services
250 William Howard Taft Road, First Floor
Cincinnati, OH 45219

If your shop is located in **Clark, Greene, Miami or Montgomery** County, then mail your completed notification form to:

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280

For your information, I have attached a copy of OAC rule 3745-21-18. Additional information, such as definitions contained in OAC rule 3745-21-01, may be found at the following web link:
http://www.epa.state.oh.us/dapc/regs/3745-21/3745_21.html

If you have any questions, please feel free to contact me at 937-285-6439.

Sincerely,

Jim Pellegrino
Office of Compliance Assistance and Pollution Prevention
Southwest District Office

**Notification Report for OAC rule 3745-21-18
For Commercial Motor Vehicle and Mobile Equipment Refinishing Operations**

Submission of this form constitutes notice that the party identified in Section I of this form complies with the notification provisions of OAC 3745-21-18(C). An original signature is needed and forms transmitted by fax will not be accepted.

Section I - Applicant Information

Company (Applicant) Name: _____

Company Location Address: _____
(address) (city) (state) (zip)

Contact Name (Print): _____ Phone: _____

Section II - Demonstration of Use of High Efficiency Transfer Equipment

1. Check (/) each application technique your shop uses to apply coating containing volatile organic compounds (VOC) as a pretreatment, primer, sealant, base coat, clear coat, or topcoat to mobile equipment for commercial purpose:

- | | |
|--|---|
| <input type="checkbox"/> Flow or Curtain Coating | <input type="checkbox"/> Electro-deposition Coating |
| <input type="checkbox"/> Dip Coating | <input type="checkbox"/> High Volume, Low Pressure |
| <input type="checkbox"/> Roller Coating | <input type="checkbox"/> Electrostatic Spray |
| <input type="checkbox"/> Brush Coating | <input type="checkbox"/> Airless Spray |
| <input type="checkbox"/> Cotton-tip Swab Application | <input type="checkbox"/> Air-assisted Airless Spray |

2. Does your shop apply VOC containing material with any other method other than those listed above?
~ YES ~ NO
(If "yes" , you are required to obtain Ohio EPA approval to use this method. Please contact your local Ohio EPA field office.)

Section III - Employee Coating Application Training Verification

Has each employee who applies VOC containing coating been trained per the manufacturer's specifications to properly use the high efficiency coating applicators indicated above? ~ YES ~ NO

If yes, please describe below the method(s) used to ensure proper training of each employee who applies VOC containing coating at your shop. [Some examples are: 1.) "Each paint technician is trained by ABC Spray Gun Company" ; or 2.) Paint shop supervisor trains each paint technician per HVLP gun manufacturer's operating manual."] If additional space is needed to describe your training method, please add an attachment labeled "Section III".

Section IV - Demonstration of Proper Spray Gun Cleaning System:

Check (/) each cleanup procedure your shop uses to clean spray guns:

- _____ An enclosed spray gun cleaning system kept closed when not in use
- _____ Un-atomized discharge of solvent into paint waste container kept closed when not in use
- _____ Disassembly of paint gun and cleaning in vat kept closed when not in use
- _____ Atomized spray into a paint waste container that is designed to capture all atomized solvent emissions

Section V - Demonstration of Proper Material Management

Does your shop store all VOC containing materials, including coatings (new and used), solvents, additives, wastes, and any materials moistened with VOC containing materials (e.g., applicators, towels), in non-absorbent, non-leaking containers which are closed at all times when not in use? ~ YES ~ NO

Section VI - Employee Material Management and Cleanup Training Verification

Has each employee who uses VOC containing coatings and cleanup materials been trained in the proper procedure for cleaning spray guns and managing VOC containing materials? ~ YES ~ NO

If yes, please describe below the method(s) used to ensure proper training of each employee who uses VOC containing coatings and cleanup materials. [An example is: Paint shop supervisor trains each paint technician the proper procedures for the management of VOC containing coatings and cleanup materials, as well as spray gun cleaning techniques.] If additional space is needed to describe your training method, please add an attachment labeled "Section VI".

Section VII - Signature

Owner or Operator Name (Print): _____ Title: _____

Owner or Operator Signature: _____ Date: _____

Commercial Motor Vehicle and Mobile Equipment Refinishing Operations.**(A) Applicability.**

The requirements of this rule shall apply to all commercial motor vehicle and mobile equipment refinishing operations (sources), regardless of date of construction or modification, that are located in Butler, Clark, Clermont, Greene, Hamilton, Miami, Montgomery and Warren counties.

(B) Definitions.

The definitions applicable to this rule are contained in paragraph (D) of rule 3745-21-01 of the Administrative Code.

(C) Operating Requirements.

Within sixty days after the effective date of this rule, a person at a facility subject to the requirements of this rule shall:

- (1) Use one or more of the following application techniques, in accordance with manufacturer's specifications, to apply any coating containing a VOC as a pretreatment, primer, sealant, basecoat, clear coat, or topcoat to mobile equipment for commercial purposes:
 - (a) flow or curtain coating;
 - (b) dip coating;
 - (c) roller coating;
 - (d) brush coating;
 - (e) cotton-tipped swab application;
 - (f) electro-deposition coating;
 - (g) high volume, low pressure (HVLP) spraying;
 - (h) electrostatic spray;
 - (i) airless spray;
 - (j) air-assisted airless spray; and

- (k) Any other coating application method that the applicable facility demonstrates and Ohio EPA determines achieves emissions reductions equivalent to HVLP or electrostatic spray application methods. This demonstration shall be submitted for approval to the director of Ohio EPA. Any equivalent coating application method approved by the Director shall be submitted to the U.S. environmental protection agency as a revision to the Ohio state implementation plan for ozone.
- (2) Be properly trained in the use of an HVLP sprayer, or equivalent application, in accordance with manufacturer's specifications, and the handling of a coating and any solvents used to clean the sprayer.
- (3) Spray guns used to apply mobile equipment repair and refinishing coatings shall be cleaned by one of the following:
 - (a) an enclosed spray gun cleaning system that is kept closed when not in use;
 - (b) un-atomized discharge of solvent into a paint waste container that is kept closed when not in use;
 - (c) disassembly of the spray gun and cleaning in a vat that is kept closed when not in use; and
 - (d) atomized spray into a paint waste container that is fitted with a device designed to capture atomized solvent emissions.
- (4) Store the following materials in nonabsorbent, non-leaking containers and keep these containers closed at all times when not in use:
 - (a) fresh coatings;
 - (b) used coatings;
 - (c) solvents;
 - (d) VOC-containing additives and materials;
 - (e) VOC-containing waste materials; and
 - (f) cloth, paper, or absorbent applicators moistened with any of the items listed in this subsection.

(D) Exemptions.

The following coating applications shall be exempt from the requirements of this rule:

- (1) the application of a coating for graphic designs, stenciling, lettering or other identification marking through the use of an air brush method;
- (2) the application of a coating sold in a non-refillable aerosol container; and
- (3) the application of a coating to mobile equipment solely for repair of small areas of surface damage or minor imperfections.

(E) Reporting Requirements.

- (1) Not later than one hundred twenty days after the effective date of this rule, each owner or operator subject to the provisions of this rule shall submit documentation sufficient to demonstrate that high efficiency transfer application techniques of coatings required in this rule are in use at their facility. The documentation also shall verify that all employees applying coatings are properly trained in the use of an HVLP sprayer, or equivalent application, and in the handling of a coating and any solvents used to clean the sprayer. This documentation shall be submitted to the appropriate Ohio EPA district office or local air agency. In addition, the owner or operator shall retain the documentation on site and make the documentation available to the Ohio EPA or local air agency upon request.

Effective: 02/10/2006

R.C. 119.032 review dates: 02/10/2011

CERTIFIED ELECTRONICALLY
Certification

01/31/2006
Date

Promulgated Under: 119.03
Statutory Authority: ORC 3704.03(E)
Rule Amplifies: ORC 3704.03(A) and ORC 3704.03(E)