

**Small Business Environmental Assistance Program**

NYS Pollution Prevention Institute

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## **EPA Requirements for Methylene Chloride Paint Stripping Operations 40 CFR Part 63, Subpart HHHHHH (November 2022)**

**Who must comply?**

Facilities whose potential to emit is below (or capped below) 25 tons per year (tpy) of combined hazardous air pollutants (HAP) and 10 tpy of any single HAP AND uses chemical strippers containing MeCl (CAS#00075-09-2) to remove dried paint (including, but not limited to pain, enamel, varnish, shellac and lacquer) from wood, metal, plastic and other substrates.

**Exemptions-** The following are exempt from this regulation:

- Paint stripping operations of military munitions or military munitions transport equipment;
- Operations that take place at installations owned/operated by the various military and federal administrations;
- Operations performed by individuals on their personal possessions or for others without receiving compensation;
- Research and laboratory activities;
- Quality control activities or
- Operations subject to another NESHAP

**How can I tell if the paint stripper contains MeCl?**

You can determine if a product contains MeCl by reviewing the materials safety data sheets. If MeCl is present it will be listed in the MSDS usually in the Composition or Ingredient section (typically Section 2 of an MSDS, but MSDS' can vary so be sure to read the entire document).

*Be careful! MeCl has many different names (Freon 30, dichloromethane, etc.), so when reviewing the MSDS also check for the Chemical Abstracts Service or CAS #75-09-2. If this number is listed, the product contains MeCl.*

*Switching products or using new ones that contain MeCl will make you subject to this regulation. Make sure new stripper product does not contain MeCl or make sure you are following the requirements outlined below upon startup.*

### ***What are the requirements?***

Facilities that use paint stripping products that contain MeCl need to implement management practices to minimize the evaporative emissions including, at a minimum:

- Evaluate each application to ensure there is a need for paint stripping,
- Evaluate each MeCl paint stripping operation to ensure no alternative technology is available,
- Reduce exposure of MeCl containing products to the air,
- Optimize conditions at time of application to reduce evaporation, and
- Practice proper storage and disposal of MeCl containing paint strippers.

*If you use more than 1 ton of MeCl annually, you must also do the following:*

- Maintain copies of annual usage of paint stripper containing MeCl on site at all times,
- Develop and implement a written MeCl minimization plan and keep the plan on site, and
- Post a sign outlining the MeCl minimization plan in each area where MeCl containing paint stripping operations occur.

### **What is my deadline?**

New facilities must be in compliance upon startup. New facilities must also submit a Notification of Startup with 180 days of startup.

### **Additional Reporting and Record Keeping**

- If there are any changes in your compliance status during the calendar year, you need to submit an Annual Notification of Changes Report (by March 1).
- Keep all copies of forms and notifications submitted.
- Document MeCl evaluations.
- If applicable, maintain usage records for pain stripper products containing MeCl; written MeCl minimization plan and post required signs.
- Don't forget about the state air permitting requirements!

