

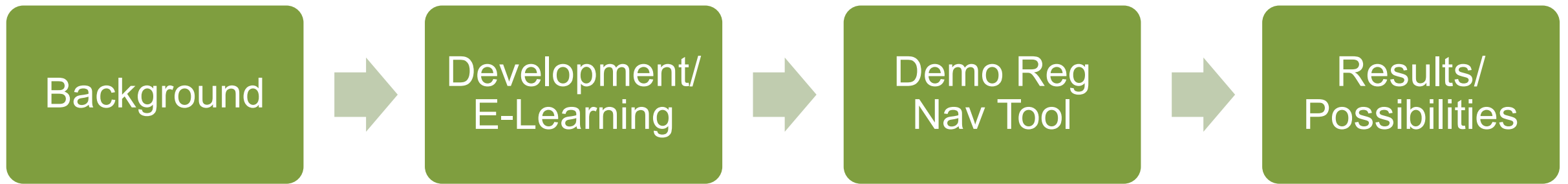


September 23, 2021
AAPCA Best Practices Award
Tony Pendola, PE

NESHAP 6H Reg Nav Tool



Overview



Small Business Ombudsman (SBO)

Small Business Environmental Assistance Program (SBEAP)

To aid small business owners who may not be able to easily comply with or understand the highly complex Clean Air Act, Congress created the Small Business Environmental Assistance Programs.



**National
Small Business
Environmental
Assistance Program**

nationalsbeap.org

SBEAPs at a Glance

- Mandated under Section 507 of the 1990 CAAA
- Small = <100 employees
- Tech. Assistance - Essentially Consultants
 - Confidential
 - Non-regulatory
 - Free
- But much more...
 - Ombudsman (Advocate)
 - Comment on state and federal rules, etc. (6H)
 - Outreach to small businesses
 - Assist with compliance issues
 - Help solve State/Local/Tribal issues
- National Steering Committee



Background

- 6H is different than all other air rules
- Only one that predetermines that an entire industry is subject to it
- Proof of compliant paints is required to obtain exemption
- Autobody industry has serious internal compliance drivers



Paint Manufacturer Lists

- Developed more than a decade ago
- Centralized electronic tracking of pollutants
- Peer pressure
- Lists represent over 95% of automotive paints in the marketplace
- Core data for making exemption decisions
- Linked to/from Reg Nav Tool

Vendor Resources for 6H Petition for Exemption

<https://nationalsbeap.org/compliance/petition>

Several collision repair painting and coating vendors have developed web resources related to the "[6H auto body rule](#)" and paint formulas that allow facilities to be exempt from the requirements. The [regulatory navigation tool](#) can be used in conjunction with this list to determine if an autobody shop can petition for an exemption.

Below are links to vendor-supplied resources. This is not necessarily a comprehensive list, and if you have additional resources that can be added to this page please e-mail info@nationalsbeap.org. If you have compliance-specific questions, contact your [state SBEAP](#).

Akzo Nobel/Wanda

- [Question and answer document regarding the 6H rule](#)

Axalta (formerly DuPont)

- [List of products containing 6H compounds](#)

BASE

e-Learning



- RICE Reg Nav
- Articulate
- Free Trial
- No Code/Low Code
- Shelled
- Resurrected
- For Industry & Regulators
- Not State-specific So Share Widely

Regulation Navigation Tool

The National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources Rule (Subpart HHHHHH)- determining eligibility to apply for an exemption.

[40 CFR Part 63 Subpart 6H, National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources](#)



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Introduction

This software program is designed to help the owners and operators of mobile or stationary auto body shops to determine if they are eligible for an exemption under [40 CFR Part 63 Subpart 6H, National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources](#). By answering the successive questions, your eligibility for an exemption will be determined. Please refer any questions to your local authority.

To learn more about the Collision Repair Campaign, click [here](#).

Note: The tool will use information that you enter to assess the potential regulatory requirements, but the information is not stored and cannot be saved. You will need to print your results page(s) for your records.



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Definitions:

Please note that this only applies to collision repair facilities that spray apply coatings to motor vehicles and mobile equipment!

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).

Spray Apply does not include non-refillable aerosol containers, non-atomizing applications, nor devices with a paint cup capacity less than or equal to 3 fluid ounces.



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Target HAPs?

Do you spray any coatings that contain ANY of the five target Hazardous Air Pollutants (Cadmium - Cd, Chromium - Cr, Lead - Pb, Manganese - Mn, or Nickel - Ni)?

You can find a link to most major paint manufacturer's data [here](#).

- ☐ Yes
- ☐ No

| | | |
|------------------|--------------|----------------------------|
| B7 -54216-Q [00] | | CODE:Y52P |
| Spa Yellow Pri | | 1997-2003 Acura |
| Ultra 7000 [New] | | SIZE: 1 Quart(s) |
| RO#: | | |
| PT16 | GOLD PEARL T | 87.2 |
| U7231 | R.S. YELLOW | 253.0 |
| U7107 | ULTRA ORGANI | 214.4 |
| U7128 | L.F. BRIGHT | 188.7 |
| U7282 | UHS BC WHITE | 7.1 |
| U7215 | BC MICA MIXI | 263.0 |
| VOC (#/gl):4.58 | | VOC Less Exempt(#/gl):4.58 |
| Accents:EXT | | Photo: Lead:0.00 |



SUBMIT

Axalta™ Coating Systems 6H Target Hap Product List - July 2021

| Stock Code | Product Name | EPA Target HAP | Replacement Offering |
|---|---------------------------------------|--------------------------------|--|
| Cromax® - National Emission Standards 6H Target HAP Product List | | | |
| 226S™ | ALUMINUM CONVERSION COATING | Chromic Acid | Replace with 22880S™/22806S™ Discontinued Jan 13, 21 |
| 22860S™ | CHROMAPREMIER® ETCH PRIMER | Zinc Chromate | Discontinued - Replace with 22880S™/22806S™ |
| 2580CR™ | CHROMATE EPOXY DTM P/S | Zinc Chromate | Replace with 921S™ or 2540S™ |
| 5718S™ | STEEL & GALVANIZED CONVERSION COATING | Nickel Phosphate | Replace with 22880S™/22806S™ |
| 615S™ | VARIPRIME® SELF-ETCH PRIMER | Zinc Chromate | Replace with 22880S™/22806S™ |
| 842J™ | MASTERTINT™ LIGHT YELLOW | Lead Chromate | Discontinued with no in-kind replacement |
| 844J™ | MASTERTINT™ MEDIUM YELLOW | Lead Chromate | Discontinued with no in-kind replacement |
| 851J™ | MASTERTINT™ BRIGHT ORANGE | Lead Chromate Molybdate | Discontinued with no in-kind replacement |
| WB33™ | CROMAX® PRO GREEN GOLD | Nickel Azo Complex (py 150) | Replace with WB40™. Discontinued |
| Standex® - National Emission Standards 6H Target HAP Product List | | | |
| 02012650 - MIX 823™ | STANDOX® Basecoat - Moss Green Pearl | Trivalent Chromium bearing | Replace with Mix 809™ |
| 02052148 - MIX 323™ | STANDOHYD® - Moss Green Pearl | Trivalent Chromium bearing | Replace with Mix 309™ |
| 02052156 - MIX 385™ | STANDOHYD® - Gold Yellow | Nickel azo complex bearing | Replace with Mix 308™ |
| Spies Hecker® - National Emission Standards 6H Target HAP Product List | | | |
| 291 0561 7 - MB 561™ | Blue Green Pearl | Trivalent Chromium bearing | Replace with MB 562™ |
| 360 2852 5 - WB 852™ | Greenish Yellow | Nickel azo complex bearing | Replace with WB 855™ |
| 361 2861 9 - WB 861™ | Bluish Green Pearl | Trivalent Chromium bearing | Replace with WB 862™ |
| Nason® Finishes - National Emission Standards 6H Target HAP Product List | | | |
| 431-81™ | MOLY ORANGE TONER | Lead Chromate Molybdate | Discontinued |
| 431-82™ | MEDIUM CHROME YELLOW TONER | Lead Chromates, Lead Sulfphate | Discontinued |
| 489-22™ | ENAMEL DRIER | Manganese Neodecanoate | Obsolete was used with Nason® Astron® |
| 491-17™ | ETCH PRIMER | Zinc Chromate | Replace with 491-55™ |
| General Industrial Coatings - National Emission Standards 6H Target HAP Product List | | | |
| 4084P™ | OPTICOLOR 4000 BURNT UMBER | Manganese (IV) Oxide | No replacement |
| 691-475™ | PRETREATMENT WASH PRIMER | Zinc Chromate | No replacement |
| Transportation, Coating Solutions, Sports & Equipment - National Emission Standards 6H Target HAP Product List | | | |
| 1008S™ | MASTERTINT™ MOSS GREEN PEARL | Chromium (III) Oxide | 908J™ |
| 1013S™ | MASTERTINT™ ORANGE PEARL | Chromium Hydroxide | 913J™ |
| 1015S™ | MASTERTINT™ BLUE GREEN PEARL | Chromium (III) Oxide | 915J™ |
| 13206S™ | ALUMINUM CONVERSION COATING | Chromic Acid | Aviation Products; no replacement |
| 13238S™ | EPOXY PRE-TREATMENT | Strontium Chromate | Aviation Products; no replacement |
| 13550S™ | EPOXY PRIMER | Strontium Chromate | Aviation Products; no replacement |
| 250-S™ | METALOK® CVP PRETREATMENT | Strontium Chromate | Replace with 235S™ |
| 538H™ | MASTERTINT™ H/S YELLOW | Nickel Oxide | no replacement, discontinued Discontinued 10+ years ago |
| 5718S™ | STEEL & GALVANIZED CONVERSION COATING | Nickel Phosphate | Replace with 22880S™/22806S™ Discontinued Jan 13, 21 |
| 731A™ | CENTARI® ORANGE | Lead Chromate Molybdate | Discontinued Discontinued 10+ years ago |
| 733A™ | CENTARI® RED ORANGE | Lead Chromate Molybdate | Discontinued Discontinued 10+ years ago |
| 737A™ | CENTARI® YELLOW | Lead Sulfochromate Yellow | Discontinued Discontinued 10+ years ago |
| 738A™ | CENTARI® LT. YELLOW | Lead Sulfochromate Yellow | Discontinued Discontinued 10+ years ago |
| 761A™ | CENTARI® L/F YELLOW | Chromium(III) | no replacement Discontinued 10+ years ago |
| 762A™ | CENTARI® YELLOW L/F | Nickel Oxide | no replacement Discontinued 10+ years ago |
| 821CR™ | CHROMATE EPOXY DTM P/S | Zinc Chromate | Replace with 921S™ or 2540S™ |
| 825S™ | CORLAR® EPOXY PRIMER RED | Zinc Chromate | Replace with 824S™ |
| 8522AE™ | ILU MIDNIGHT CHERBY | Organic Chromium (III) Complex | no replacement |



AkzoNobel - Wanda

AkzoNobel
Car Refinishes NA
Regulatory Affairs

1845 Maxwell
Troy, MI
USA
48084

T 248-637-8576
F 248-649-3584
www.akzonobelcarrefinishes.net



AkzoNobel
Tomorrow's Answers Today

Table 1
Wanda Vehicle Refinish Products Subject to
Area Source Rule, Subpart 6H

| SAP Item # | SBC Item Code / Toner # | Material Description | Target HAP |
|------------|-------------------------|--------------------------|--------------|
| 391753 | 422.02800.04 | WandaBase HS Deep Black | Chromium III |
| 391776 | 429.09270.04 | Wanda PU HS 2K/PU Red | Manganese |
| 481174 | W452 | Wanda WB Greenish Yellow | Nickel |

Below threshold as applied?

Do all the remaining coatings contain less than 1% Manganese (Mn) and trivalent Chromium (Cr+3) AND less than 0.1% Cadmium (Cd), hexavalent Chromium (Cr+6), Lead (Pb), and Nickel (Ni) as sprayed, **NOT** as supplied?

For example:

If you have 30 grams of a pearl that contains 2% lead chromate and you add a pint of toner weighing 450g and cut that 1:1 with a pint of reducer weighing 400g, you only have:

$30g / (30g + 450g + 400g)$
 $30g / 880g$
 $0.034 \times 100\%$
3.4% pearl @ 2% lead chromate
 $.034 \times .02 \times 100\% = 0.068\%$
which is less than the 0.1% threshold, and therefore exempt



SUBMIT

You may NOT petition for exemption

Based on your responses, you are not eligible to petition for an exemption for your facility under 40 CFR Part 63 Subpart HHHHHH. Petitions for Exemption may be requested at any time.



Compliance Assistance may be available from the Small Business Environmental Assistance Program (SBEAP) in your area.

Please click [here](#) to locate yours.



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You may petition for exemption

Based on your responses, you may petition for an exemption for your facility under CFR Title 40 Part 63 Subpart HHHHHH.

View this document to see where you should send your request. Click [here](#).

If your delegated agency does not provide a Petition for Exemption form, consider using this example. Click [here](#).

Please note that while you are exempt from the coatings portion of the rule, ANY use of methylene chloride stripper will subject you to that portion of the rule.



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https://regnav.app.cloud.gov/6h/6HExemptionStorylineoutput/story_html5.html

6H Exemption

Compliance Assistance

Thank you for using the 6H Petition for Exemption Assessment Tool

For free, confidential, non-regulatory help, contact your Small Business Environmental Assistance Program (SBEAP) by clicking the logo below.



**SMALL BUSINESS
ENVIRONMENTAL
ASSISTANCE
PROGRAM**

Serving Small Businesses and the Environment

Review Survey

Print Results



Results and Possibilities



- 40% reduction in collisions
- Time for environmental training
- Pandemic made us all e-Learners
- Collaborate with EPA and other MJOs
- Sign up for a Reg Nav Tool
- Use the Texas Flowcharts to start
- More tools and more quickly
- Enhance consistency
- APTI course on Tool for staff

Parting Thoughts

- Reg Nav Tools save time for both industry and regulators
- SBEAPs can be an excellent resource
- e-Learning is here to stay
- Many hands make light work
- Fits within EPA's new Air Toxics Strategy of collaborating externally

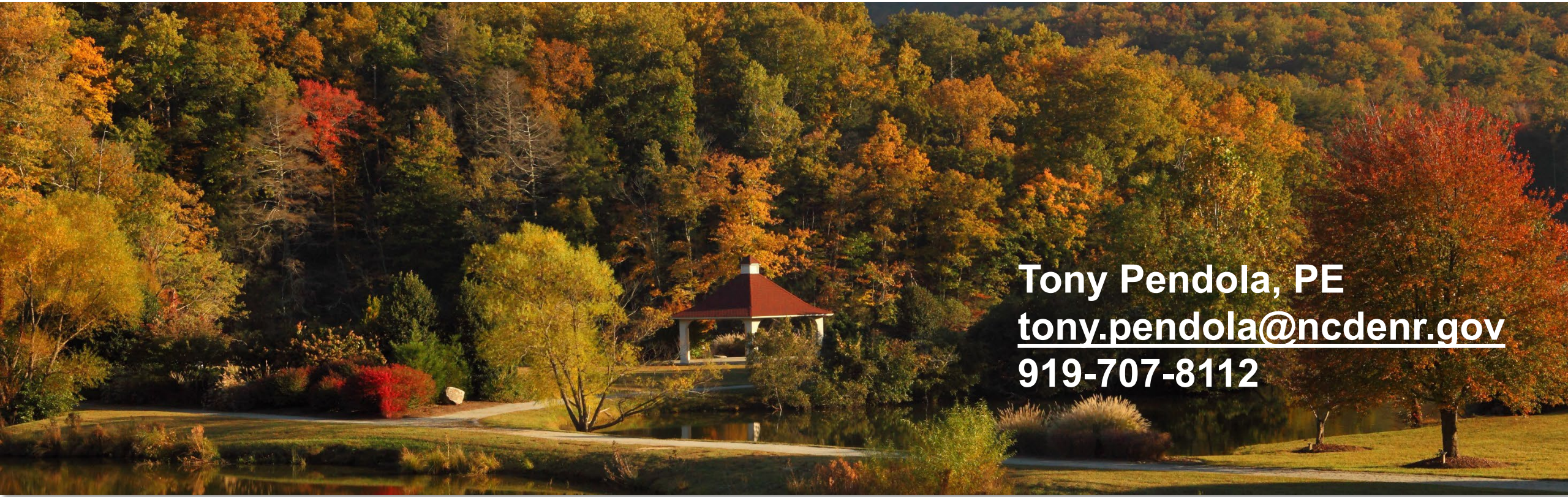
Department of Environmental Quality



Questions



Contact Information



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