

SACRAMENTO METROPOLITAN



AIR QUALITY
MANAGEMENT DISTRICT

Compliance Assistance ADVISORY

**SUBJECT: National Emission Standards for
Hazardous Air Pollutants (NESHAP) for
Automotive Refinishing Operations**

Advisory #09-02

June 2009

IMPORTANT INFORMATION FOR OWNERS AND OPERATORS OF AUTOMOTIVE REFINISHING OPERATIONS

Your facility has been identified as an operation potentially affected by a regulatory action of the Environmental Protection Agency (EPA). The purpose of this letter is to inform you of requirements you may now have to comply with as a result of this action.

On January 9, 2008, the Environmental Protection Agency (EPA) adopted a National Emission Standard (NESHAP) for paint stripping and miscellaneous surface coating operations (Subpart HHHHHH). As a result of EPA's action, automotive refinishing operations previously exempt from the requirement to obtain a permit from the Sacramento Metropolitan Air Quality Management District (SMAQMD) are no longer exempt and must now obtain a SMAQMD permit pursuant to SMAQMD Rule 201, Section 110.2.

Under previous requirements, automotive refinishing operations using less than a gallon/day of paint and solvents combined (small facilities) were exempt from the requirement to obtain a SMAQMD permit. Given that *all* automotive refinishing operations are now subject to NESHAP requirements, all must have a SMAQMD permit to operate, regardless of amounts used.

To facilitate compliance with SMAQMD permit requirements, enclosed you will find an application for a permit to operate. In addition, you will find a pamphlet describing the NESHAP requirements. Please note that in addition to the requirement to obtain a SMAQMD permit there is a federal notification requirement you must complete by January 11, 2010. A form for this notification is enclosed as well.

Please be advised that operation of any automotive refinishing operation without a SMAQMD permit is now a violation of SMAQMD Rule 201 and subject to penalties as specified in California Health and Safety Code, Section 42402.

If you are a facility doing automotive refinishing, the SMAQMD hereby requests that you complete and submit an application for a permit with required fee by **August 1, 2009**. To fulfill both local and federal requirements as expeditiously as possible, the SMAQMD recommends you submit a copy of your federal notification form with your application for permit.

If you need assistance in completing your application for permit or have any questions regarding these requirements, you may call Brian Krebs at (916) 874-4856 or the SMAQMD's *Compliance Assistance Hotline* at (916) 874-4884.