



NESHAP Subpart 6H for Automobile Refinish

Training Requirements and Self Certification¹

Many shops owners/managers are asking questions about the training requirements under this new rule from the Environmental Protection Agency (EPA). What are the training requirements and how can you certify your painters?

How can shop owners and /or operators certify their painters have received the required training?

Shop owners who can show by documentation or certification that a painter's work experience and / or training has resulted in training equivalent to the required training are **not** required to provide the initial training required by § 63.11173 (f)(2). Painter training that meets the following two conditions can be used to satisfy this training requirement:

- Completed within five years prior to the date training is required (January 10, 2011 for existing shops), and
- Meets the training requirements of the rule.

What are the painter training requirements? (§ 63.11173 (f)(2))

Painters must be certified as trained in proper spray application of surface coatings, setup and maintenance of spray equipment, including the following topics:

- Equipment selection, set up, and operation including:
 - measuring viscosity,
 - selecting proper tip or nozzle,
 - proper spray pattern,
 - air pressure and volume, and
 - and fluid delivery rate.
- Best spray technique for different types of coatings to improve transfer efficiency and minimize overspray including:
 - spray gun distance and angle to the part,
 - proper banding and overlap, and
 - reducing lead and lag spraying.
- Routine booth and filter maintenance, filter selection and installation.
- Environmental compliance with requirements of the NESHAP (see below)

What are the environmental compliance requirements of this rule?

Spray Booths

Spray-applied coatings must be applied in spray booth, preparation station, or mobile enclosure that meets a, and either b, c or d:

- a. Fitted with filter system demonstrated to have 98% collection efficiency, using vendor provided test data, or using water wash spray booths operated to manufacturer's specs
- b. Booths and prep stations for complete motor vehicles or mobile equipment must
 - Have full roof and four walls or side curtains, and operate and negative pressure; OR
 - Use downdraft booth operated at up to, but no more than, 0.05 inches w.g. positive pressure

- c. Booths or prep stations for coating of miscellaneous parts or vehicle subassemblies
 - Have full roof, at least 3 complete walls or side curtains, and ventilated so air is drawn into the booth
 - Roof and walls may have openings for conveyors
- d. Mobile enclosures for spot repairs must enclose and seal against the surface being coated so that overspray is retained in enclosure and directed to the filter.

Spray Equipment

Spray-applied coatings must be applied using one of the following gun technologies:

- High volume, low pressure (HVLP)
- Electrostatic
- Airless
- Air-assisted airless, or
- With written approval from Administrator, other spray technology demonstrated to achieve equivalent transfer efficiency

Spray Gun Cleaning

Spray gun cleaning operation must avoid the creation of an atomized mist and avoid spraying cleaning solvent and paint residue outside container used to collect waste solvent.

- Acceptable options include:
 - Hand cleaning of disassembled gun,
 - Flush gun with solvent, without spraying,
 - Use fully enclosed gun cleaner, or
 - Combination of non-atomizing methods.

What else must be included in the training plan?

The training program must include the following items:

- A current list of all current personnel by name and job description who are required to be trained (i.e. painters).
- A description of the training requirements of the rule (§ 63.11173 (f)(2)).
- A description of the methods used to document the completion of
 - Initial training
 - Refresher training, required every five years.

What must be done to certify painter training?

By using the **NESHAP 6H Self Certification Checklist** provided by AkzoNobel, owners can review their painter's previous training and compare that to the elements of the required training outlined in the checklist. Owners can then use the **NESHAP 6H Self-Certification Form** provided by AkzoNobel to document and certify that their painters have been trained. This method can be used for the initial training only.

¹It is ultimately up to the individual shop owners/managers to independently evaluate the EPA NESHAP Subpart 6H for Automobile Refinish and determine whether their program complies with the rules regarding training and self-certification. This information is provided to assist in this determination and is current as of the printing of this document.



NESHAP Subpart 6H Self-Certification Checklist

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 in paragraph (f) (2) of section §63.11173 are **not** required to provide the initial training required by said paragraph to these painters. The painters must be knowledgeable in the following:

Paint and Spray Technique

- _____ Spray gun equipment selection, set-up and operation (including proper fluid tip or nozzle)
- _____ Measuring coating viscosity
- _____ Proper spray pattern
- _____ Achieving proper air pressure, volume and delivery rate.
- _____ Spray technique for different types of coatings, improving transfer efficiency, minimize coating usage and overspray.
- _____ Maintaining correct spray gun distance and angle to part.
- _____ Using correct overlap and triggering methods.
- _____ Routine spray booth and filter maintenance, which includes filter selection and installation (selecting filters with 98% efficiency rating).

Environmental Requirements of Subpart 6H

- _____ All spray applied coatings must be applied in a spray booth or preparation station that has 98% efficient filters.
- _____ Spray booths and preparation stations used for complete motor vehicles must be fully enclosed with full roof and four complete walls or side curtains and must be ventilated at negative pressure, or if using an automatic pressure balancing system, at 0.05 inches positive pressure.
- _____ Spray booths and preparation stations that are used to paint miscellaneous parts and products or vehicle subassemblies must have a full roof, at least three complete walls and must be ventilated so that air is drawn into the booth.
- _____ All spray applied coatings must be applied with an HVLP spray gun, electrostatic application, airless spray gun, air assisted airless spray gun or equivalent technology.
- _____ All paint spray gun cleaning must be done so that an atomized mist or spray gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent.

