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Subject: Exemption from HHHHHH Area Source Rule

40 CFR Part 63, Subpart HHHHHH, the **National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coatings Operations at Area Sources**, also known as the 6H Area Source Rule, regulates facilities that spray-apply coatings on metal and plastic substrates. Non-refinish industrial facilities are automatically exempted from the 6H Area Source Rule if they do not use methylene chloride-based strippers or any coatings that contain the target heavy metal HAPs (lead, chromium, cadmium, nickel and manganese) – no application or notification is needed. However, there is no automatic exemption for auto refinish facilities that meet the same requirements. Refinish facilities must apply for an exemption to either U.S. EPA or to their state or local agency if the agency has been delegated responsibility for administering the 6H Area Source Rule.

The 6H Area Source Rule provisions include spray gun transfer efficiency limits; prep station, spray booth and spray gun cleaning standards; painter training requirements, and recordkeeping requirements. There are also specific requirements for operations using methylene chloride-based strippers.

PPG Refinish has developed support documents for facilities subject to the regulation, which can be found on our website at www.ppgrefinish.com. A copy of the 6H Area Source Rule also can be found on the website by clicking on "Safety and Health" in the gray toolbar at the top of the page, and then on "Rules and Regulations" in the column at the left. Painter training classes are available through coatings manufacturers and vocational education programs; some state or local agencies administering the rule may offer classes as well.

If you only use PPG products and you'd like to see if you meet the requirements for an exemption, you can use the tools on the PPG Refinish website www.ppgrefinish.com to check. Click on "Safety and Health" in the gray toolbar at the top of the page, and then on "Products Containing Metals" in the column at the left. Open **the lower pdf** on the page "[View products containing Pb, Cd, Cr, Mn, Ni.](#)" Find the product lines used at your facility and review the codes listed as containing heavy metal HAPs. If your facility uses any of the products on this list and you plan to keep on using them, you are not eligible for an exemption from the 6H Area Source Rule.

For your convenience, a short list of PPG Refinish product favorites that do not contain the target heavy metal HAPs is contained in the table below. Customers using only these PPG products may be eligible for an exemption if they don't use any other non-PPG products containing the target heavy metal HAPs and don't use methylene chloride-based strippers. The product list below is not all-inclusive. There are other PPG Refinish products that do not contain U.S. MSDS-reportable levels of the Area Source Rule listed heavy metal HAPs. You can check by consulting the MSDS Hazardous Ingredients Section for specific products. If no compounds are listed that contain lead, cadmium, chromium, manganese or nickel – they would be allowed under an exemption from the rule.

If a facility obtains an exemption, then chooses to use or accidentally selects coatings products that contain US MSDS reportable levels of the listed heavy metal HAPs, they should notify the EPA administering party (where they obtained the exemption). They will likely have to file a report with the EPA; it is possible that their exemption could be withdrawn.

| 40 CFR Part 63, Subpart HHHHHH, the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coatings Operations at Area Sources | | | |
|---|---|--|--|
| HHHHHH Area Source Rule exemption application compliant products | | | |
| 1.) The following products, if used with their TDS recommended ancillary products will not contain US MSDS reportable levels of heavy metal HAPs. | | | |
| 2.) Use of these products is recommended as of 7/8/10, if more than one year passes we expect users should check the PPG Refinish website at www.ppgrefinish.com for an updated document. Product lists can be revised on a yearly basis. | | | |
| 3.) List is not intended to be all inclusive. Check website www.ppgrefinish.com pdf " View products containing Pb, Cd, Cr, Mn, Ni " under "Safety and Health"/ "Products Containing Metals" page for items to be avoided | | | |
| 4.) Note: where a color system is listed and followed by "only", users MUST pay particular attention to selecting PPG supplied formulas that are defined for label and MSDS -1 designations, NEVER to use -2, -3 or -4. | | | |
| <u>Nexa Autocolor 2K</u> | <u>Deltron</u> | <u>Envirobase HP</u> | <u>OMNI</u> |
| P190-5520 P190-6659 P190-6690 P420/421 (lead free colors only) P422 (lead free colors only) P565-301X P565-314X P565-51X P565-530X P565-713 P572-4001 | DAS302X DPLF DBC-1** only DPLV305X DBU-1** only DPS305X DC3000 DPX171 DC3010 DPX801 DC4000 K36* DC4010 K38* DC4126 K93* DCC-1 only NCP250 DCU2002 NCP27X DCU2010 NCP280 DCU2021 NCS200X DCU2042 | ECP1X ECS2X ECS6X EHP EC700 EC750 <u>OneChoice</u> SX1071 SU4902 SU4903 | MBC-1 only MP180 MBP-1 only MP282 MBX-1 only MP292 MC260 MP801 MC262 MTK-1 only MC262 MTX-1 only MC770 MP178 |
| <u>Global</u> | <u>ValuePro</u> | <u>Aquabase Plus</u> | <u>ShopLine</u> |
| BC-1 only D825* D808X D831 D8102 D839* D8126 D890 D8150 D893 D8152 D894 D8170 DG-1 only D8188 DLV800X D820 DLV808X D822 | P330-1900 P390-4005 P330-1200 VB-1 only P330-1700 VBP-1 only P330-1800 VBX-1 only P390-4000 VU-1 only P390-4001 VUX-1 only P390-4003 P390-4004 | P565-9880 P565-520X P565-312X P110-5000 P989 P190-6490 P190-6730 P190-6759 P190-6790 | JAU-1 only JC780 JB-1 only JC781 JBP-1 only JLV-1 only JBX-1 only JP202 JC620 JP2282 JC630 JP252 JC660 JP355 JC661 JTX-1 only JC70 P390-4001 JC7200 |
| * Tintable versions of these primers should not use heavy metal toners listed on the website (see note 3 above). | | | |
| ** DBU-1 & DBC-1 intermix colors MUST NOT use PRL 94 or DMX dyes due to possibl Cr(III) content | | | |

Products are included on the table above because they do not contain the target heavy metal HAPS in the 6H Area Source Rule. However, other regulations may apply to your use of the products, such as state or local limits on VOC content. It is the responsibility of the jobber and end user to determine whether a particular product complies with federal, state and local regulations.

Use of Aquabase Plus & Envirobase High Performance color would not restrict a user from applying for an exemption from the 6H Area Source Rule. These products do not contain U.S. MSDS-reportable levels of the target heavy metal HAPs in the 6H Area Source Rule. For other color systems, note that the recommended intermix color formulas are restricted to PPG supplied “-1” formulas. In the case of DBC-1, users must also be certain these formulas do not contain DMX toners (found in DBCFLM-1, DBCHE-1, DBCLUM-1, DBCRBASE-1 and DBCTINT-1 special effect colors).

It is the responsibility of the formulator in charge to determine the heavy metal content of all components used to create field matches. PPG Refinish recommendations in this document are based solely on the intermix color match formulas that we provide through PPG’s online color and Paint Manager programs.

Check with your state or local air agency to obtain forms or instructions for applying for an exemption from the 6H Area Source Rule. If your state or local agency has not been delegated authority to administer the 6H Area Source Rule, you can contact the regional EPA office for your area. For regional EPA contact information, go to <http://www.epa.gov/epahome/regions.htm>.

An exemption from the 6H Area Source Rule does not exempt the facility from the requirements of any other applicable local, state or federal rule.

This “Exemption from HHHHHH Area Source Rule” document is intended to provide INFORMATION for review by PPG’s customers. In providing this document, PPG makes no separate or additional warranties, express or implied, and assumes no liability or responsibility arising out of its use. It is the responsibility of each customer, RE-SELLER AND END USER of PPG’s products to independently ascertain that their practices are legal, appropriate and constitute sound product stewardship. This “Petition for exemption from HHHHHH Area Source Rule” document is general in nature and is not intended to address site OR PRODUCT-specific issues. Approaches to different issues may vary depending on individual circumstances. This document is not INTENDED to define or create legal rights or obligations. It is the responsibility of each customer, RE-SELLER AND END USER to comply with federal state and local laws.