

Reassessment of Auto body Industry and Air Quality Implications

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Introduction

- There is a regional effort underway evaluating VOC reductions for this sector
- For this sector we have a need to learn more as we do not have a significant knowledge base
- Partnering on data collection
- Work with auto body association to collect baseline data on the number of shops and emissions in CT

Background

40 CFR Part 63 Subpart HHHHHH

6H applies to paint stripping and miscellaneous surface coating operations at many body shops that are Area Sources

EPA administers the program, Connecticut does not have delegation

6H

Requirements

Initial Notification due January 11, 2010

Compliance Certification due March 11, 2011

Recordkeeping Requirements

Application Equipment Requirements

Application Cleaning Equipment Requirements

Work Practices

Training Requirements

6H

What Are the Reductions?

- Reduce 1,000 tons MeCl annually
- Reduce 6,900 tons of HAP annually including 11 tons of metal HAP.
- For more information

<http://www.epa.gov/ttn/atw/area/arearules.html>

- VOC reductions unquantified

Potential VOC Reduction Opportunity

OTC Model Rule

- VOC limits
- Application Equipment Requirements
- Cleaning Equipment Requirements
- Work Practices
- Training Requirements

**Information specific to CT is needed to evaluate
if appropriate strategy to pursue in CT**

Assess For Connecticut

- CT specifics need to be considered because CT differs from California
- Evaluation will benefit from stakeholder input
 - Technical support
 - Cost evaluation
 - Qualitative knowledge

Connecticut Assessment

- What VOC reductions are achieved with 6H?
- What requirements for notification, certification, equipment, cleaning, work practice and training are achieved by 6H?
- What additional VOC reductions will be achieved via rule adoption in Connecticut?
- What additional VOC reductions will be achieved via business trends/compression?

What We Plan To Do

- Contact auto body shops
- Include representatives from auto body shop industry & CBIA
- Gather CT specific data to inform decision making
- Gather state specific data from states that already have restrictions on VOC use at auto body shops
- Evaluate if OTC strategy is appropriate for CT

Outreach in Process

- Site visits to various sized shops
- January 6th meeting with trade groups and auto body shop representatives
- Questions for attendees are due January 15th
- Analyses of reductions and costs is needed
- Trade Association data to inform decision making