

40 CFR 63 Subpart HHHHHH Area Source NESHAP Spray Painter Training & Certification Requirements

In January 2008, the *National Emission Standards for Hazardous Air Pollutants (NESHAP): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources* (6H NESHAP) went into effect, regulating facilities that spray-apply coatings which contain target HAPs*, or hazardous air pollutants. Since these HAPs are released into the atmosphere as they are atomized during the spray painting process, spray painters at these shops must be stringently trained and certified in techniques in which minimize these emissions.

This fact sheet assumes that your shop has already determined* that it is 1) subject to this regulation and therefore 2) all of your spray painters are required to attend training and become certified on the training components outlined below.

* If you need more information or assistance making this determination, please refer to the two following fact sheets: *EPA Requirements for Automotive Refinishing Industry* and *EPA Requirements for Metal & Plastic Parts Surface Coating Operations*. For additional help, please contact the SBEAP at our phone number listed below.

Applicability and Compliance Standards: Spray Painter Training & Certification

Existing Facilities – Facilities that began spray painting operations on or before September 17, 2007 are considered “existing” facilities. New operations/businesses that move into an established building are considered “existing” as long as spray painting operations occurred at the location on or before September 17, 2007. Spray painters at these facilities have until January 10, 2011 or within 180 days from the date of hire (whichever is later) to receive appropriate training and certification.

New Facilities – Facilities that began spray painting operations after September 17, 2007 are considered “new” facilities. Spray painters at these facilities have 180 days from the date of hire to receive appropriate training and certification.

Certifications are valid for *five years* from the date the training is successfully completed. Refresher training and re-certification is required every five years. Training components for both initial and refresher training are outlined in the *Training Program* section.

Training Program Requirements

All new, existing and contracted spray painters are required to be trained in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. The regulation allows painters to attend professional training or they can be trained ‘in-house’ as long as the course provides classroom and hands-on elements. The course must include all of the following, at a minimum:

1. A list of all current personnel by name and job description who are required to be trained.
2. Hands-on and classroom instruction (initial training and then refresher training every 5 years) on the following topics:
 - Spray gun equipment selection, set up and operation, including measuring coating viscosity and selecting the proper fluid tip or nozzle.
 - Achieving the proper spray gun pattern, air pressure and volume, and fluid delivery rate.



- Spray techniques for different types of coatings to improve transfer efficiency and minimize coating usage and overspray which include: maintaining the correct spray gun distance and angle to the part; using proper banding and overlap; and reducing lead and lag spraying at the beginning and end of each stroke.
 - Routine spray booth maintenance and filter selection, installation and maintenance.
 - Review of environmental requirements of this regulation.
3. Training programs must document that their program meets the above requirements. Spray painters must receive certification upon successful completion of the training program.

The EPA has indicated that they will not be approving each training program. Several nationally recognized companies have already developed training programs, available in both internet based format and the more traditional classroom style setting. Check with the SBEAP or your industry representatives for leads on programs that will best suit your needs.

Documentation

Facility owners must maintain a list of all spray painters and ensure that the spray painter's certifications are up-to-date. Records must include each spray painter's date of hire and certification that each painter has successfully completed a suitable training program, and the dates of completion for both their initial training and most recent refresher training. Records should be maintained in an appropriate format so that is easily accessible upon inspection.

For more information regarding the regulation and additional requirements call the Small Business Environmental Assistance Program at 1-800-780-7227.

Small Business Environmental Assistance Program
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