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 HHHHHHH

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 6\textsuperscript{th} meeting with trade groups and auto body shop representatives
• Questions for attendees are due January 15\textsuperscript{th}
• Analyses of reductions and costs is needed
• Trade Association data to inform decision making