



IOWA DEPARTMENT OF NATURAL RESOURCES
AIR QUALITY BUREAU

**DRAFT NOTIFICATION LETTER FOR
PERMIT BY RULE FOR SPRAY BOOTHS**

To be eligible for a permit by rule for spray booths, a facility must meet all applicable requirements established in 567 Iowa Administrative Code (IAC) subrule 22.8(1) **and** must certify that the facility currently is or will be in compliance with or otherwise exempt from the requirements of National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Surface Coating Operations at Area Sources (40 CFR Part 63, Subpart HHHHHH) and the NESHAP for Metal Fabrication and Finishing at Area Sources (40 CFR Part 63, Subpart XXXXXX) by the applicable NESHAP compliance dates. The owner or operator shall complete this form and submit **one (1) original** to: Iowa DNR, Air Quality Bureau, 7900 Hickman Road, Suite 1, Windsor Heights, Iowa, 50324.

***Retain a copy of the completed form for your records.
The permit becomes effective upon the DNR's receipt of this notification letter.***

Section 1 – Facility Information

Print in ink or type		For DNR Use Only	
		Field Office _____	
		Facility ID _____	
_____ Name of Firm/Company	_____ Facility Name (if different)		
_____ Mailing Address -Street/PO Box	_____ City	_____ State	_____ Zip
_____ Equipment Location - Street	_____ City	_____ State	_____ Zip
_____ Person to Contact	_____ Phone Number	_____ Fax Number	

Section 2 - Applicability

Please complete the seven applicability questions below unless otherwise directed. A facility that is not eligible to use this form must apply for a construction permit as specified under 567 IAC subrules 22.1(1) and 22.1(3) unless otherwise exempt from the requirement to obtain a construction permit.

1. What is the facility-wide spray material use *per day*? (check one)

- One Gallon per day or less (Must record amount of paint used each day per 22.8(1)"b")
- More than one gallon per day but less than three gallons per day (Spray booth must be vented with a stack which is at least 22 feet tall, as measured from the ground and must record amount of paint used each day per 22.8(1)"c")
- Three gallons or more per day (Not eligible for Permit by Rule for Spray Booths)

2. The spray booth(s) at the facility will spray paint or coatings on what type of materials? (check **all** that apply)

- Motor vehicles or mobile equipment (e.g. any device that may be drawn or driven on a roadway)
- Plastic or metal parts and products
- Wood or other substrates not metal or plastic

Section 2 – Applicability (continued)

3. Is the *primary*¹ activity of your facility in one of the following nine metal fabrication and finishing source categories? Autobody shops are currently not included in any of the nine listed metal fabrication and finishing source categories. **Check all that apply below and proceed to question 5. If none of the categories below apply to your facility, check “none” below and proceed to question 4.**

- Electrical and Electronic Equipment Finishing Operations (including motor and generator manufacturing, and electrical machinery, equipment, and supplies, not elsewhere classified) [SIC codes 3621 or 3699];
- Fabricated Metal Products, not elsewhere classified [SIC code 3499];
- Fabricated Plate Work (Boiler Shops) [SIC code 3443];
- Fabricated Structural Metal Manufacturing [SIC code 3441];
- Heating Equipment, except Electric [SIC code 3433];
- Industrial Machinery and Equipment Finishing Operations (including construction machinery manufacturing; oil and gas field machinery manufacturing; and pumps and pumping equipment manufacturing) [SIC codes 3531, 3533 or 3561];
- Iron and Steel Forging [SIC code 3462];
- Primary Metal Products Manufacturing [SIC code 3399];
- Valves and Pipe Fittings, not elsewhere classified [SIC code 3494].
- None** (proceed to question 4)

4. Are the operations at your facility specifically exempt from NESHAP Subpart HHHHHH - Miscellaneous Surface Coating Operations at Area Sources? A complete list of exemptions is included in 40 CFR Section 63.1169(d). **Check all exemptions that apply and Skip to Section 3. If none of the exemptions listed below apply, check “no” and go to question 6.**

- Surface coating is performed **only** on wood, leather, rubber, ceramics, stone, masonry or substrates other than metal or plastic.
- Coatings applied consist **only** of adhesives, sealants, maskants, caulking materials or decorative, protective or functional materials that consist only of protective oils for metal, acids or bases.
- Surface coating performed on site at installations owned or operated by the US Armed Forces, NASA or the National Nuclear Security Administration.
- Surface coating of military munitions, as defined in §63.11180, manufactured by or for the US Armed Forces or equipment directly and exclusively used for the purposes of transporting military munitions.
- Coating performed by an individual on their possessions (not including motor vehicles or mobile equipment), either for hobby or maintenance.
- Coating performed by an individual on others’ possessions (not including motor vehicles or mobile equipment), either for hobby or maintenance for which no compensation is received.
- Coating performed by an individual on personal or others’ motor vehicles or mobile equipment as long as no more than two vehicles or pieces of mobile equipment are coated per year.
- Surface coating that meets the definition of “research and laboratory activities” in §63.11180.
- Surface coating that meets the definition of “quality control activities” in §63.11180.
- Surface coating activities that are covered under another area source NESHAP.
- No** (proceed to question 6)

¹ Many facilities perform these metal fabrication and finishing processes but are not subject to NESHAP Subpart XXXXXX unless they are “primarily engaged” in operations which are classified in one of the listed nine source categories. To check if you are subject, check your SIC code(s) with the SIC codes that are subject to this rule and listed above. A more detailed description of the affected source categories is included in the text of the rule at <http://www.epa.gov/ttn/atw/area/compilation.html>.

Section 2 – Applicability (continued)

5. Are all of the operations at your facility specifically exempt from NESHAP Subpart XXXXXX – Metal Fabrication and Finishing Operations? A complete list of exemptions is included in 40 CFR Section 63.11514. **Check all exemptions that apply and Skip to Section 3. If none of the exemptions listed below apply to all operations at your facility, check “no” and go to question 6.**

- Surface coating performed at research or laboratory facilities as defined in section 112(c)(7) of the CAA.
- Surface coating performed at tool or equipment repair operations, for facility maintenance or for quality control as defined in §63.11522.
- Surface coating performed on site at installations owned or operated by the US Armed Forces, NASA or the National Nuclear Security Administration.
- Surface coating of military munitions, as defined in §63.11522, manufactured by or for the US Armed Forces or equipment directly and exclusively used for the purposes of transporting military munitions.
- No** (proceed to question 6)

6. Do the paint or coatings spray applied in your booth(s) contain² Cadmium, Chromium, Lead, Manganese or Nickel?

- Yes**
- No.** The spray booth(s) is not subject to the requirements of 40 CFR Part 63, Subpart HHHHHH or Subpart XXXXXX. (Skip to Section 3)

7. Which Area Source NESHAP applies to your surface coating operation? (the spray booth(s) at the facility cannot be subject to both NESHAP.)

- 40 CFR Part 63, Subpart HHHHHH³ The spray booth(s) are subject to the requirements of 40 CFR Part 63, Subpart HHHHHH if you checked “none” in question 3, the booth(s) do **not** meet one of the exemptions listed in question 4 and you answered “yes” to question 6.
- 40 CFR Part 63, Subpart XXXXXX⁴ The spray booth(s) are subject to the requirements of 40 CFR Part 63, Subpart XXXXXX if you checked any category (besides “none”) in question 3, the booth(s) do **not** meet one of the exemptions listed in question 5 and you answered “yes” to question 6.

² In order for a coating or paint to contain these compounds as defined under the NESHAP, the compounds must be present in concentrations equal to or greater than 0.1 percent by mass for Cadmium, Chromium, Lead and Nickel or be present in concentrations equal to or greater than 1.0 percent by mass for Manganese. Refer to product MSDS, Manufacturer’s Product Specification Sheet, or contact the coating or paint manufacturer directly to determine if the coating or paint contain any of the compounds at the defined concentrations.

³ Please refer to the full rule text of 40 CFR Part 63, Subpart HHHHHH available at <http://www.epa.gov/ttn/atw/area/compilation.html> to determine all applicable equipment requirements, management practices, monitoring requirements, recordkeeping requirements and reporting requirements necessary to be in compliance with this rule. The DNR has also developed a guide to the NESHAP for Miscellaneous Surface Coating Operations at Area Sources. This guide is available on our website at <http://www.iowadnr.gov/air/prof/NESHAP/>.

⁴ Please refer to the full rule text of 40 CFR Part 63, Subpart XXXXXX available at <http://www.epa.gov/ttn/atw/area/compilation.html> to determine all applicable equipment requirements, management practices, monitoring requirements, recordkeeping requirements and reporting requirements necessary to be in compliance with this rule. NESHAP Subpart XXXXXX applies not only to spray booths, but also to dry abrasive blasting, machining, dry grinding and polishing with machines and welding. If a facility that is primarily engaged in one of the nine metal fabrication and finishing operations listed in question 3 also performs any other of these industrial processes, it is possible that these other operations are subject to NESHAP Subpart XXXXXX. Each industrial process is regulated only if they use materials that contain or have the potential to emit the compounds listed in question 6. Any operations other than spray booths subject to the requirements of NESHAP Subpart XXXXXX may be required to obtain a construction permit unless otherwise exempt. The DNR has also developed a summary of requirements for this rule for each industrial process. These documents are available on our website at <http://www.iowadnr.gov/air/prof/NESHAP/>.

Section 3 – Spray Booth Description

Please provide the following details for each of the paint booths at your facility. If additional space is needed, please attach a separate sheet.

LIST ALL SPRAY BOOTHS AT THE FACILITY:

	Spray Booth ID #	Booth Type	Location
<i>Ex.</i>	<i>Spray booth 1</i>	<i>Cross-draft automotive</i>	<i>N.E. Corner of building A</i>
1			
2			
3			
4			
5			
6			
7			
8			

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Section 4 – Certifications (PLEASE READ CAREFULLY)

SPRAY BOOTH CERTIFICATION: All facilities must complete this certification and sign below.

- "I certify that all spray booths at the facility and listed in Section 3 are in compliance with all applicable requirements of rule 567 IAC 22.8(1)(455B). I understand that this equipment shall be deemed permitted under the terms of 567 IAC 22.8(1)(455B) only if all applicable requirements of 567 IAC 22.8(1)(455B) are met. This certification is based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete."*

SPRAY MATERIAL CERTIFICATION: Only facilities that answered "none" in question 3 and "no" in question 6, or answered question 7 must complete one of these certifications and sign below. Answer box 1 or 2, as applicable, not both.

1. *"I certify that none of the coatings used in my motor vehicle or mobile equipment spray booth contain Cadmium, Chromium, Lead, Manganese or Nickel. I understand that if circumstances change, such that I intend to spray apply coatings containing these materials, I shall comply with the requirements of the NESHAP for Miscellaneous Surface Coating (40 CFR Part 63, Subpart HHHHHH) and submit the initial notification required by §63.11175."*

*I intend to use the following types of coatings in my motor vehicle or mobile equipment spray booth:
(for example: polyurethane coatings)*

OR

2. *"I certify that I am subject to 40 CFR Part 63, Subpart HHHHHH or Subpart XXXXXX, as specified in this form. I understand that I must submit all subsequent notifications and reports as required by the applicable NESHAP. I further certify that in regards to Subpart HHHHHH and Subpart XXXXXX the facility:*

Currently is/will be in compliance with 40 CFR Part 63, Subpart HHHHHH or Subpart XXXXXX by the applicable NESHAP compliance dates.

or

I plan to be exempt from 40 CFR Part 63, Subpart HHHHHH or Subpart XXXXXX by the applicable NESHAP compliance dates. I understand that if circumstances change, such that I am not longer exempt, I shall comply with the requirements of the 40 CFR Part 63, Subpart HHHHHH or Subpart XXXXXX and submit the initial notification required by §63.11175 or §63.11519. If I spray apply coatings to motor vehicles or mobile equipment, I understand that I must petition for an exemption if I no longer spray apply coatings that contain Cadmium, Chromium, Lead, Manganese or Nickel.

Signature

Title

Date

Print Name