



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

Mr. Michael F. Szabo
Senior Environmental Engineer/Consultant
GZA
11499 Chester Road, Suite 511
Cincinnati, Ohio 45246

RE: Request for applicability determination of 40 CFR Part 63 Subpart HHHHHH to Hartford Finishing Inc., Wisconsin

Dear Mr. Szabo:

The U.S. Environmental Protection Agency has received and reviewed the request from GZA on behalf of Hartford Finishing Inc. (Hartford), located in Hartford, Wisconsin, dated December 28, 2020. This request asks for an EPA determination on the applicability of the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR § 63 Subpart HHHHHH (6H), to Hartford's Polyurea line operation (line 3). In summary, as explained below, Subpart 6H does not apply to line 3 as long as this line does not use a spray coating with a hazardous air pollutant (HAP) included under Subpart 6H.

Hartford's Request

Hartford contends that Subpart 6H does not apply to its line 3 because this operation does not use a spray coating containing a HAP regulated by Subpart 6H (target HAP).

Analysis

Hartford is a contract miscellaneous surface coating facility and coats a variety of metal components for various manufacturing companies. According to Hartford, line 3, the specific line at issue, applies a spray coating that does not contain target HAPs to metal components.

40 CFR Part 63 Subpart 6H covers two categories of sources: 1) motor vehicles and mobile equipment surface coating operations, and 2) miscellaneous surface coating operations. The final rule for Subpart 6H, found at 73 Fed. Reg. 1738 (January 9, 2008), provides that for motor vehicle and mobile equipment coating, Subpart 6H applies to all operations at the facility that spray apply coatings. "The applicability language in § 63.11170 for motor vehicle and mobile

equipment surface coating operations has been revised to clarify that the standards apply to all sources that spray apply these coatings.” (73 Fed. Reg. 1744). That is, for motor vehicle or mobile equipment coaters, all operations at a facility that spray coatings are subject to this standard.

While the final rule explains that Subpart 6H standards apply to motor vehicle and mobile equipment coating facilities regardless of whether the coating contains a target HAP, the final rule also explains that for miscellaneous surface coating facilities, Subpart 6H only applies to operations that spray coatings containing a target HAP covered by Subpart 6H. “For miscellaneous surface coating operations, the rule has been revised so that it applies only to those surface coating operations that spray apply coatings that contain the target HAP; other surface coating operations do not need to comply with those requirements.” (73 Fed. Reg. 1744). The definition of “miscellaneous surface coating operations” specifies that a single affected source may have multiple surface coating operations. 40 CFR § 63.11180. Accordingly, for miscellaneous parts coating, if a surface coating operation at the facility applies target HAP coating, then that operation is subject to Subpart 6H, if the operation does not apply target HAP coating, that operation is not subject to the Subpart.

If line 3 at Hartford does not use any coatings which contain a target HAP covered by Subpart 6H, then line 3 operation is not subject to the requirements of Subpart 6H. However, if at any time, line 3 were to use a spray coating containing a target HAP, line 3 operation would be subject to the requirements in Subpart 6H.

If you have any further questions, please contact Susan Kraj of my staff at (312) 353-2654.

Sincerely,

**DOUGLAS
ABURANO** Digitally signed by
DOUGLAS ABURANO
Date: 2021.02.16
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Douglas Aburano
Acting Chief
Air Programs Branch

cc: Kristin Hart, Program Manager
Permits and Stationary Source Modelling Section
Wisconsin Department of Natural Resources

Paul Yeung
Air Management Engineer
Wisconsin Department of Natural Resources