



MPC 6H Rule Resource Guide

Federal EPA rule 40 CFR Part 63, Subpart HHHHHH (6H)

6H Rule Official Documents and Contacts

There are a variety of sources for information about Federal EPA rule 40 CFR Part 63, Subpart HHHHHH (6H), but the best and most accurate source of information is with the EPA directly. It is imperative that paint shops read and understand the national ruling (which goes beyond just paint use) as well as assess whether and how state or local requirements amend the requirements.

According to the EPA, copies of the rule and other materials are located at:

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

For information on state requirements, state representatives can be identified at:

http://www.epa.gov/ttn/atw/area/table_state_contacts.doc

<http://www.4cleanair.org/contactUsaLevel.asp>

PPG Refinish, MPC's parent organization, has a helpful series of documents regarding this rule available at the following website: <http://www.ppg.com/coatings/refinish/en/safetyhealth/Pages/RulesRegs.aspx>

Affected MPC Users

The Federal EPA rule 40 CFR Part 63, Subpart HHHHHH (6H) affects the following operations, with limited exception:

- Paint stripping operations that use methylene chloride (MeCl)-containing paint stripping formulations;
- Spray application of coatings to motor vehicles and mobile equipment;
- Spray application of coatings to a plastic and/or metal substrate where the coatings contain compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

Operations affected by the ruling must make initial notification to the EPA by January 11, 2010, be compliant with the ruling by January 10, 2011, and submit notification of compliance to the EPA by March 11, 2011.

There are four MPC products specifically affected by this ruling; they each contain the regulated HAP material Chromium (Cr):

- 74 734SP Metal Pretreatment
- 74 760SP PT Filler
- 74 770SP HBPT (High Build PT Filler)
- 74 780SP HBEF (High Build Etching Filler)

These products are all generally categorized as etch primers. The ruling does not state that these products may no longer be used. The ruling simply states that these products must be used in accordance with specific guidelines and compliance records must be kept by shops using them.



MPC offers a variety of primer options which do not contain the regulated HAP materials. Contact your local MPC representative, visit our website at www.matthewspaint.com, or call our customer service line at 800-323-6593.

Shop and Painter Certification Resources

There are a variety of options to certification under the ruling, including self certification. Below are a few resources to consider for assistance in training and compliance:

1. GRC-Pirk Management Company

This is the most notable certification source catering to the sign industry. Their contact information is as follows:

Government Regulatory Compliance LLC
d.b.a. GRC-Pirk Management Company
Registered Environmental Assessors
P.O. Box 21270, Reno, NV 89515
1135 Terminal Way, Reno, NV 89502

888-374-7475 (Toll Free Phone)
775-824-9008 (Reno Local)
866-729-3892 (Toll Free Fax)
<http://www.haps6h.com>

2. International Sign Association

ISA is partnering with **GRC-Pirk** to train and certify member companies on the EPA 6H rule.

The following statement was excerpted from the ISA website on July 13, 2010 at
<http://www.signs.org/IndustryNews/ISAPartnerswithGRCPirktoTrainIndustryonEP.aspx>

On Jan. 10, 2011, all companies that use spray guns must be in compliance with the EPA's National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (HAPs 6H). The rule requires employee training (classroom and hands-on); approved spray guns, filters and prep booths; and annual notification and record keeping of compliance. ISA and GRC-Pirk will be holding trainings across the country for ISA members. If you have questions about the rule or would like information on the training, e-mail Sapna Budev, ISA director of industry programs, at sapna.budev@signs.org.

3. Regional and Local Sign Associations

Many regional and local sign associations are also offering programs and training through **GRC-Pirk**. Check with your local sign association.

4. Matthews Paint Company Training Classes

MPC has for years offered complimentary painter training to our valued customers. As part of our standard training program at these classes, painters receive specific training in the application



requirements identified in the 6H rule. They will receive a training booklet and a written test, which can be used as record of painter training as part of a shop's 6H compliance records.

To find out more about class dates and locations or register for a class, contact your local MPC representative, visit our website at www.matthewspaint.com, or call our customer service line at 800-323-6593.