
ENVIRONMENTAL Fact Sheet



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Toxic Air Pollutants and Auto Body Spray Coating Operations

Toxic air pollutants, also known as hazardous air pollutants, are pollutants that have the potential to cause severe human health effects and environmental impacts. NHDES protects public and environmental health by reducing exposure to toxic air pollutants through regulating toxic emissions from businesses in the state following NH Administrative Rules Env-A 1400 *Regulated Toxic Air Pollutants*. A list of regulated toxic air pollutants (RTAPs) is updated yearly by NHDES. Many paints and solvents used in the auto body refinishing sector contain toxic air pollutants and, therefore, use of such substances is subject to Env-A 1400.

Auto body shops that perform spray coating operations are exempt from the requirements of Env-A 1400 if the following conditions are met:

- The facility vents emissions from each spray booth/station through an exhaust stack that is vertical and unobstructed, meaning that there is no impediment to vertical flow and the stack extends at least 2 feet higher than any roofline within 10 feet of the stack exit, measured horizontally;
- The facility is in compliance with the federal regulation 40 CFR Part 63, Subpart HHHHHH *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources* (see <http://www.epa.gov/collisionrepair/> for information regarding this regulation); and
- The facility uses less than 500 gallons per year of commercially available paints or coatings. Auto body shops must maintain records of paint and coating usage on-site to confirm compliance with the usage limit of 500 gallons per year.

If a source cannot demonstrate the conditions of exemption listed above, Env-A 1400 allows sources several methods for demonstrating compliance, including air dispersion modeling analysis, a de minimis (minimal) emission level method, an in-stack concentration method, or a NHDES-approved alternative method.

Exhaust stacks can be designed to prevent incoming water from rain and snow while remaining vertical and unobstructed, as defined by NHDES. A rain cap is considered to be an impediment to vertical flow. A stack equipped with a rain cap would not be considered “vertical and unobstructed.” Such caps are allowed, but certain methods of demonstrating compliance with Env-A 1400 are only available for sources equipped with stacks that are vertical and unobstructed.

UNOBSTRUCTED STACK

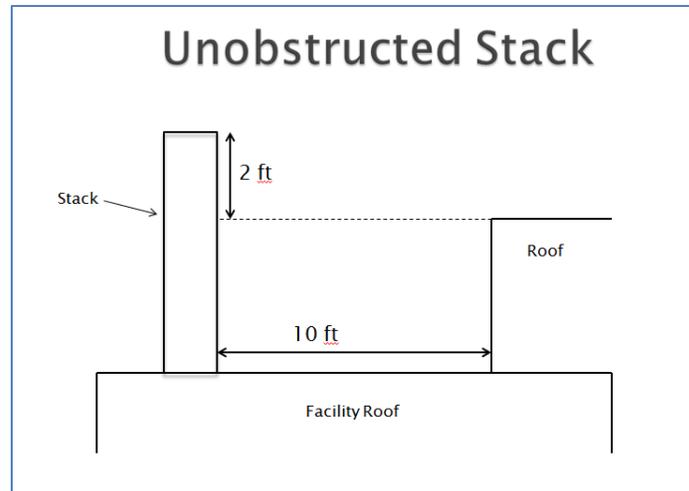


Figure 1 - Example of an unobstructed stack. The stack is at least 2 feet higher than any roofline within 10 feet of the exhaust stack exit, measured horizontally, and there is no impediment to vertical flow (e.g. a rain cap) from the exhaust stack.

OBSTRUCTED STACK

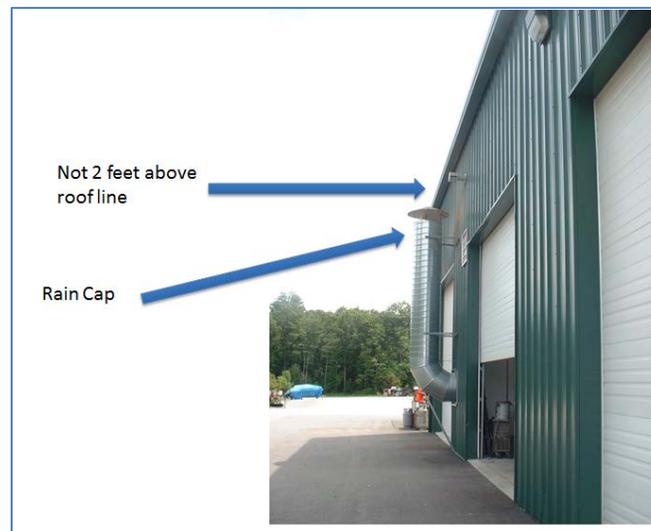


Figure 2 - Example of an exhaust stack that does not meet the criteria to be considered vertical and unobstructed. The stack is below a roofline that is within 10 feet of the stack exit and there is a rain cap installed on the top of the stack which impedes vertical flow from the stack.

For Information and Assistance

The New Hampshire Small Business Technical Assistance Program is available to assist small businesses in determining which regulations apply to them. Small businesses can contact Sara Johnson, Small Business Ombudsman, at (603) 271-1379 or sara.johnson@des.nh.gov.