
ENVIRONMENTAL Fact Sheet



29 Hazen Drive, Concord, New Hampshire 03301 • (603) 271-3503 • www.des.nh.gov

CO-18

2012

Conducting Flammable and Combustible Spray Coating Operations *Are You in Compliance with State Regulations?*

What is a “Spray Coating Operation”?

“Spray coating operation” means the application of any material in a solid or liquid form that is applied to a solid object for the purpose of adding color or protecting the solid object from corrosion. Examples of spray coating operations include:

- Auto body refinishing
- Painting of sheet metal parts
- Applying spray adhesive
- Furniture finishing

In general, a spray coating operation is the application of a coating to another object through the use of an air-assisted transfer device such as a spray gun.

What is meant by the terms “Flammable” and “Combustible”?

Flammable materials are liquids that have a “flash point” of less than 100° F. The flash point is the lowest temperature at which a liquid will generate sufficient vapor to flash (ignite) when exposed to a source of ignition. Examples include auto refinishing paints, oil based wood stains and other non-aqueous (water) based coatings.

Combustible materials are substances that can be burned to provide heat or power. Examples include motor oil, some powder coatings and some flocks.

What are the requirements for conducting spray coating operations?

There are a number of existing regulations affecting the spraying of any flammable or combustible material. In general, the following requirements apply to a facility conducting these operations:

- All spraying operations must be conducted in a spray booth or a designated spray area meeting the requirements of the National Fire Protection Association (NFPA) Standard 33, “Spray Application Using Flammable and Combustible Materials.” (OSHA Regulation 29 CFR 1910.107, New Hampshire State Fire Code and NFPA 1, “Fire Prevention Code”)

- The emissions from the use of any coating material must be evaluated to ensure that these emissions do not cause an undue health risk to the general public. (RSA 125-I and Code of Administrative Rules Chapter Env-A 1400)
- Depending on the actual and potential usage levels of the spray coatings used, a Permit to Operate may be required from the Department of Environmental Services.
- Unused waste coatings and solvents may be considered hazardous waste and must be disposed of in accordance with state and federal regulations.

What do I need to do in order to be in compliance?

There are a number of steps to take to be in compliance with the regulations and avoid enforcement actions. These include:

- Conduct all spraying operations in a spray booth or designated spray area complying with the requirements of NFPA Standard 33.
- Keep accurate records of the total amount of coatings and solvents used on a daily and annual basis.
- Perform a Regulated Toxics Air Pollutant (RTAP) analysis of the emissions from the operation.
- Ensure all hazardous waste is disposed of in compliance with state and federal regulations.

Where can I go for help?

For information and assistance in complying with NFPA and Fire Code regulations, contact your local fire department or the State Fire Marshal's Office at (603) 271-3294.

For assistance in determining compliance with environmental regulations, contact Sara Johnson, NH Small Business Technical Assistance Program, at (603) 271-1379 or sara.johnson@des.nh.gov.