

Air quality technical standards checklist for coating facilities

Small Business Assistance

New option for small facilities: Coating facilities in Minnesota that use less than 2,000 gallons of coatings and cleaners each year or meet certain emission limits are exempted from needing an air quality permit if they follow specific requirements. The requirements are described in a technical standard in [Minn. R. 7008.2400](#) and summarized in this checklist. A notification form must be submitted to the Minnesota Pollution Control Agency (MPCA). There are no application fees. You can find the text of the Minnesota Rules on the Office of the Revisor of Statutes website at <https://www.revisor.mn.gov/rules/agency/167>.

Technical standard or permit

Overall, this technical standard is intended to be clearer and easier to follow than a permit. Technical standards establish requirements that allow facilities with low overall air emissions to bypass the paperwork and cost of an air permit while remaining environmentally protective. The requirements are written to echo federal requirements that many facilities are already following and common best practices in the industry. Proof of compliance is based on business information that most facilities are already tracking. However, if you prefer to have a permit, you can apply for a permit. Facilities that already have a permit can keep their permit or switch to this technical standard if they qualify and will follow the requirements.

If your facility has been operating without a permit and qualifies for this technical standard, the MPCA encourages you to get into compliance with this technical standard and submit the required notification form.

Requirements

Eligibility

- Substantially all air emissions at this facility must come from the coating process, and this facility is not an auto body refinishing facility.
- All other air emissions must be from insignificant activities listed in [Minn. R. 7007.1300](#), subp. 2 and 3, and the conditionally insignificant activity for mechanical finishing described in [Minn. R. 7008.4110](#). See the “Common Insignificant Activities” section below for examples.
- This facility must purchase or use less than 2,000 gallons of coatings and cleaning materials each calendar year, **or** limit Volatile Organic Compounds (VOC) emissions to 20,000 pounds and Hazardous Air Pollutants (HAP) emissions to 12,000 pounds each calendar year. This information is usually available from your supplier. If you ship waste coatings and cleaning materials off-site for reclamation or reuse, you can subtract the shipped amount from your annual total.

Operational requirements

- Painters must be trained in proper setup and maintenance of spray equipment and application of coatings. Painters must be trained within 180 days after they are hired and every 5 years after that.
- Painting must be done in a booth or prep station that is designed to confine and direct paint overspray, fumes, and vapors to a powered ventilation system. The ventilation system must have either filters or a water-wash system to ensure the paint overspray, fumes, and vapors are captured. Exceptions: painting done with a 3 ounce or smaller cup or with a 16 ounce or smaller aerosol or pump spray container can be done outside of a booth or prep station.
- Spray painting equipment, filtration systems, and booths must be used and maintained according to the manufacturers' specifications.
- Spray guns must be cleaned in a way that does not create atomized spray or mist outside of an enclosed gun washer. Examples include manual cleaning, using a gun cleaner that flushes solvent through the gun without atomizing it, or using a fully enclosed gun washer.
- If the [federal 6H National Emission Standards for Hazardous Air Pollutants \(NESHAP\) regulation](#) applies to your facility, comply with the 6H NESHAP requirements for booth specifications, methylene chloride use, filter efficiency, spray gun specifications, solvent storage, training, monitoring, and reporting. If your facility has petitioned for exemption from the 6H NESHAP regulation, you do not have to follow the requirements listed in this bullet, but you must follow all the other requirements of this technical standard. More information on the 6H NESHAP can be found on the U.S. Environmental Protection Agency (EPA) website at <https://www.epa.gov/stationary-sources-air-pollution/paint-stripping-and-miscellaneous-surface-coating-operations>.

Recordkeeping requirements

- Record the number of gallons of coatings and cleaning materials purchased or used each calendar year. If you choose to follow the emission limits option, also record the maximum VOC and HAP content of each coating and cleaning material, and keep a copy of the safety data sheet (SDS) or signed statement from the supplier verifying the maximum content.
- For facilities that subtract waste coating and cleaning materials shipped off site from their annual total, keep records of the gallons of waste coating and cleaning materials that are shipped. If you choose to follow the emission limits option, also calculate and record the pounds of VOC and HAP that were shipped for reclamation and reuse.

Recordkeeping requirements (continued)

- Record the inspection, maintenance, and repair of spray painting equipment, filter systems, and spray booths.
- Keep records showing that each painter has completed the required training.
- Keep records required by the 6H NESHAP regulation if it applies to your facility.
- Keep all records for at least five years.

Notification requirements

- To operate under this technical standard, the facility must follow all the requirements listed above and submit a [notification form](#) to the MPCA. The notification form can be found in the miscellaneous requests and notification section of the MPCA's website at <https://www.pca.state.mn.us/business-with-us/air-permit-application-forms>.
- If you have an air quality permit from the MPCA, void the permit. Request to void the permit online using MPCA's [Notice of Permit Termination e-Services](#). **Note:** If you need assistance, there are two guidance documents available: one is for first-time users called [Getting started with MPCA e-Services](#); the second is the [Guidance: Notification of permit termination e-Service](#). (Found on the MPCA's e-Services webpage at <https://www.pca.state.mn.us/about-mpca/online-services>.)

Definitions: Coatings and cleaning materials

Coatings include paint, stain, sealant, varnish, liquid-plastic coating, caulk, ink, adhesive, primer, deadener, and maskant that contain a VOC or hazardous air pollutant and are applied to a surface for decorative, protective, or functional purposes. Protective oils for metals, acids, bases, and paper or plastic film that is precoated with an adhesive by the film manufacturer are not considered coatings.

Liquid-plastic coating means a coating made from fine-particle-size polyvinyl chloride in a solution referred to as a plastisol.

Cleaning material means a solvent that contains either a VOC or hazardous air pollutant and is used to remove contaminants and other materials including dirt, grease, oil, and dried or wet coatings from a surface or from coating equipment, such as spray booths, spray guns, racks, tanks, and hangers.

Common insignificant activities

A full list of insignificant equipment and processes are found in [Minn. R. 7007.1300](#), subp. 2 and 3 and in [Minn. R. 7008.4110](#). These activities emit insignificant amounts of pollutants and do not affect whether a facility qualifies to follow a technical standard. However, note that coating facilities cannot combine this technical standard and the conditionally insignificant activity for material usage listed in Minn. R. 7008.4100.

Common insignificant equipment and processes at coating facilities include:

- Space heaters fueled by kerosene, natural gas, or propane that are rated at less than 420,000 British thermal units (BTU). A space heater is not connected to piping or ducting to distribute heat. BTU ratings are listed on the nameplate for most heaters, furnaces, and boilers.
- Furnaces and boilers with individual ratings less than 420,000 BTU and combined ratings less than 1,400,000 BTU.
- Handheld equipment used for buffing, polishing, carving, cutting, drilling, machining, routing, sanding, sawing, surface grinding, or turning.
- Blasting that uses abrasives suspended in water or sponge.
- Welding, braising, torch-cutting, and soldering.
- Plasma- or laser-cutting operations that use a water table.
- UV-light curing.
- Solvent distillation equipment with a batch capacity of 55 gallons or less.
- Dust from unpaved parking lots.

Common questions

What if my shop uses far less than 2,000 gallons of paints and solvent in a year?

You may qualify as an insignificant facility. Insignificant facilities have low enough potential air emissions that the MPCA does not require an air permit. For more information, see the MPCA webpage at <https://www.pca.state.mn.us/business-with-us/insignificant-facilities>.

Parts of this technical standard refer to the 6H NESHAP. Do I still have to follow the 6H NESHAP?

Yes, you still have to follow the parts of the 6H NESHAP that apply to your facility. Facilities that follow the requirements of the 6H NESHAP will find that they already meet many of the operational and recordkeeping requirements of this technical standard. However, keep in mind that this makes it twice as important to follow the requirements correctly.