

# Training Issue



## *“OSHA” now “EPA”*

It used to be that compliance with OSHA regulations was the # 1 worry for body shops (safe work area, respirator programs, etc.). Now a new EPA regulation, Rule 40 CFR Part 63 Subpart HHHHHH, has been added and requires that body shops certify personnel who use spray equipment. The new “6H” rule mandates several changes for shops in many markets that were previously out of compliance. Some of these changes will affect the way shops repair cars.

1. All spray painting must be done in a spray booth (there used to be an exception for less than 15 SQF—that is gone now). Full cars require a booth with 4 sides, and parts of cars require a booth with 3 sides or flaps and a roof with a ventilation system. Ventilation filters must remove at least 98% of particulate. Spot repairs must be done in an enclosure that prevents any mist escaping. “No more priming or jamming in the open shop area.”
2. Spray guns must be HVLP or transfer compliant.
3. Any employee who does spray painting must receive training. Shop owners must maintain certification on each employee who sprays paint. Certification is good for 5 years.
4. Spray gun cleaning must be done only by spraying into an enclosed gun cleaner or the gun must be manually cleaned. Solvent can no longer be sprayed into the air to clean a gun.
5. Shops need to send the EPA an “initial notification” document. The form can be found on the following internet link: [http://www.epa.gov/ttn/atw/area/paint\\_strip\\_example.doc](http://www.epa.gov/ttn/atw/area/paint_strip_example.doc) This notice was due January 2010, so if it has not been submitted, it's time.

There is an exemption for companies doing parking lot repairs that require paint gun cup sizes of 3 oz. or less, along with other regulations.

The bottom line is that this is a law your shop should pay attention to! Many government entities are experiencing budget shortfalls while at the same time feeling pressure to not raise taxes. Collecting fines from small businesses (like body shops) will provide a new source of revenue that will help close budget gaps. This law goes into effect for existing shops January 2011, and is in effect immediately for new shops.

There are several companies certifying painters for this law. Some of them are charging up to \$100 per employee. It pays to shop around for this service. There are paint companies, paint jobbers, and reps from spray gun companies doing training certification for little or no money as long as you listen to their sales spiel.

If you have any questions about this law or want a copy of the complete rule, contact your local EPA. Find your local office at [http://www.epa.gov/ttn/atw/area/regional\\_contacts.pdf](http://www.epa.gov/ttn/atw/area/regional_contacts.pdf)

**Courtesy of RTi Reading Technologies Inc.  
[www.rti-pbe.com](http://www.rti-pbe.com)**

