

Frequently Asked Questions (FAQ) for Autobody Refinishing Area Source Rule

Why is this rule being considered?

The Clean Air Act (CAA) requires EPA to develop air emission standards for a list of 187 hazardous air pollutants (HAP). Since 1990, EPA has developed emission standards for the largest sources of these pollutants, known as “major sources.” However, the CAA also requires EPA to identify and regulate the sources that pose the greatest potential health threat from these pollutants in urban areas. In urban areas, these are generally sources that are individually small, but large in number and collectively may pose health risks. They have been termed “area sources.” The EPA has identified 70 different area source categories for these air toxics that need to be regulated. So far, regulations have been developed for 15 categories and regulations for the remaining 55 categories are under development. Autobody refinishing has been identified as one of the 55 source categories that still need to be regulated. More information on the regulation of these area source categories can be found at <http://www.epa.gov/ttn/atw/urban/arearules.html>

Who would be regulated by this new rule?

This rule would likely regulate all entities that are engaged in automobile and mobile equipment refinishing, including collision repair shops, “one day” vehicle paint shops, fleet maintenance facilities, professional restoration shops, professional race car teams, and shops that customize vans and limousines.

What pollutants would EPA be targeting with this action?

The CAA requires EPA to reduce exposure to HAPs because these chemicals are known, or suspected, to cause cancer or other serious health effects, such as birth defects. Data from paint suppliers has shown that coatings used in automobile and mobile equipment refinishing contain HAP, such as hexavalent chrome, lead, toluene, xylene, methyl isobutyl ketone, and isocyanates.

Is this action similar to previous EPA or State actions to reduce volatile organic compound (VOC) emissions from paints?

No. State and Federal VOC rules were intended to reduce chemicals that form ground-level ozone. This rule would limit emissions of, and exposure to, toxic chemicals that have other adverse health effects, but this rule would not change the regulation of the VOC content of coatings.

What impact would this rule have on refinishers?

The proposed rule is still under development, but it would likely require shops to do the following:

- All shop (not office) personnel would need to complete training in the proper use of refinish materials and be certified through a national certification body, such as I-CAR and ASE, to buy and use auto refinish materials.
- All shops would need to have a filtered spray booth and all spraying of coatings would need to be done in the spray booth, or in a similar filtered enclosure, such as a prep station.
- All spraying of coatings would need to be done with an HVLP spray gun, or one with equivalent transfer efficiency.
- All shops would need to have an enclosed spray gun cleaner.

EPA is still in the early stages of developing rule requirements. We welcome your input and participation in developing the rule. It is not our intent to prohibit the purchase or use of refinish materials.

Why would a certificate be necessary to buy paints and coatings?

The paints and coatings that are readily available and widely used in automobile and mobile equipment refinishing are intended for professional use. The potential to emit harmful pollutants increases if the operator is not properly trained, or sprays coatings using improper equipment in a residential area. The certificate would establish that the user understands the requirements of this regulation and accepts responsibility for using these materials properly to protect the environment.

Would these regulations cover the use of aerosol cans or touch-up paint?

No, aerosol cans and touch-up paint would be exempt from these regulations. These regulations would only regulate coatings that are applied with compressed air spray guns.

Would this rule increase the cost of professional repairs?

We do not anticipate that this rule will increase the cost of refinishing automobiles, either associated with collision repairs or with shops that completely refinish older cars. EPA has observed that most well-operated shops are already meeting the requirements being considered by EPA and it will likely not add any burden or additional overhead to their operating costs.

When would the rule take effect?

EPA is likely to publish a proposed rule in 2007, followed by a 60-day public comment period, and publish a final rule in 2008. After the final rule is published, shops would have a specified period of time (to be determined, but not to exceed 3 years) to come into compliance.

Where can I learn more?

EPA has developed a website to highlight the rule development, you may access the webpage at http://www.epa.gov/ttn/atw/area/auto/autobody_area.html. We welcome information on the practices currently used for refinishing and your input on the potential requirements of the rule. Kim Teal of EPA is the lead for this project. She can be contacted through email at teal.kim@epa.gov, telephone at (919) 541-5580, or mail comments to her attention at U.S. EPA (C539-03), Research Triangle Park, NC 27711.