

**Region 5 Autobody ERP – Survey Instrument for EPA Inspections**

KEY:  
**Boldface Font** – Spoken question  
 Normal Font – Site visit record/contacts and response options  
*Italics* – Instruction for inspector (not spoken)

<b>Facility Information</b>	
<b>Facility Unique project ID</b>	
Facility Name	
Facility Address	
Name of Facility Contact Person	
Telephone number of Facility Contact	
<b>Facility in EJ Area? [Y/N and why]</b>	
<b>Survey Contact Info</b>	
Date of Visit	
State/EPA	
Name of Inspector	
Phone	

**Baseline Visit Script**

*If you wish to call ahead to confirm shop is actively painting:*

**Hi. My name is \_\_\_\_\_ and I am from the USEPA Region 5. We are ...confirming shops that are affected by a federal rule that is now effective. Are you the person I should talk to, or is there an owner or manager who could better answer my questions?**

**[Reintroduce if transferred to another person.] Thank you for speaking to me. First, I would like to confirm whether you are the type of shop that may be impacted by the rules.**

**Do the operations at your shop include spray painting vehicles or parts of vehicles with a spray gun?**

- Yes → *Ask next question.*
- No → *No need to schedule a visit. Track as a "DROP" on the sample list. Read paragraph A.*

**Do you use ONLY spray guns (including those spraying primer) with 3oz cup size or less?**

- Yes → *Could DROP, or visit to confirm. If dropped, track as a "DROP" on the sample list and explain why.*
- No → *Read the scheduling script in B:*

Updated 3/2011

**A. Thank you, but it appears you are not affected by the air toxics rule that we are focusing on at this time. If you would like information on other environmental requirements, I can put you in contact with your state environmental assistance program.**

**B. As a shop that does spray painting, you may be affected by a number of regulations and in particular the new EPA rule. [Anything else to say since not prearranging for a time?]**

*On site - Introduction*

**Hi, my name is [interviewer name]. Is (name of contact) available? [If not available...] Is there another person I should speak to about environmental issues, usually related to use of paints, solvents and disposing of wastes, in your shop? (The ideal respondent is the person from the shop who keeps up with environmental requirements, is familiar with shop set up and operations, and perhaps receives information through training or attending workshops or manages the operations of the shop.)**

**Hi (name of contact). I am from the USEPA Region 5 office. We are conducting an inspection to check whether you comply with the new rule on autobody refinishing shops. As part of that inspection, I will be going through a survey related to environmental practices at autobody shops.**

**It will take us about 1 – 2 hrs to talk about these environmental issues and walk through the shop. While we do that, I will be asking a series of questions to complete our survey. Is there an office, or a place where we can sit to go over some of the basic questions first?**

*It works best to go through all interview questions up front in a quiet office area and then ask to be shown through the shop for observations. Sections A through G = in office. Section I = Walk through questions. If time seems limited (shop owner seems rushed) you may prioritize the questions in order of (1) Basic Info and Air regulatory [A-C & I1 – I8], (2) HW and WW Regs (D-E, I9-I15), (3) BMPs [F-G]. Section A is critical for categorizing the results of the project in the final analysis – DO NOT skip any of those questions unless prompted.*

SECTION A: INTRODUCTION	Instructions and Tips
<p><b>A1. Which of the following categories best describes your role at this shop?</b> <i>(read categories):</i></p> <ul style="list-style-type: none"><li><input type="checkbox"/> Owner</li><li><input type="checkbox"/> Manager</li><li><input type="checkbox"/> Technician who applies spray coatings</li><li><input type="checkbox"/> Another role <i>(specify)</i> _____</li></ul>	

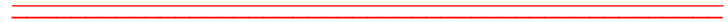
SECTION A: INTRODUCTION	Instructions and Tips
<p><b>A2. What type of services does your shop provide? (mark all that apply)</b></p> <p> <input type="checkbox"/> Auto mechanical repair    <input type="checkbox"/> Salvage Yard  <input type="checkbox"/> Autobody shop                <input type="checkbox"/> Car dealership  <input type="checkbox"/> Mobile Paint Service        <input type="checkbox"/> Car wash  <input type="checkbox"/> Other (explain): _____                 </p>	
<p><b>A3. Did your shop start coating vehicles or parts after September 17, 2007?</b></p> <p> <input type="checkbox"/> Yes  <input type="checkbox"/> No                 </p>	<p>Defined as a new affected source, and compliance was due Jan 8, 2008.</p> <p>Mainly, brand new shops only ones affected by this definition. Adding a new booth doesn't make whole shop "new", but new booth must meet rule requirements when installed.</p>
<p><b>A4. How many employees and paint technicians (or anyone who may paint) do you have in your shop?</b></p> <p> <input type="checkbox"/> # employees (total at shop)  <input type="checkbox"/> # paint technicians                 </p>	<p># employees means total for shop, including owner/manager and office staff</p> <p><b>MAKE SURE AND INCLUDE "BODY" GUYS SPRAYING PRIMERS ON THE FLOOR AS PAINT TECHS.</b></p>

**SECTION A: INTRODUCTION** **Instructions and Tips**

**A6. a. Referring to point of sales reports or information from your supplier, how much of each of the following materials have you used or purchased in the last few months? [12 months preferred]**

	Gallons	# mo
(i) Solvent-based (high VOC) coatings		
(ii) Water-based coatings (<2 lb/gal VOC)		
(iii) High-VOC cleaning solvents		
(iv) Low-VOC cleaning solvents		
(v) Liquid paint strippers – MeCl		
(vi) Liquid paint strippers – non-MeCl		

**This information may be used to calculate the environmental improvement achieved in the next few years by you and your fellow auto body shops as a group.**



**c. Were numbers provided in A6a obtained through accurate records? (Answer NO if estimates.)**

- Yes
- No

VERY important to get accurate numbers for purposes of making emissions estimates or reduction estimates at the end of the project

Most shops use computerized mixing systems. If, upon inspection, person knows how to use computer, this information can be obtained easily.

Option to just ask for print out from supplier/vendor of 6-12 months of purchase records and calculate at a later time.

SECTION A: INTRODUCTION	Instructions and Tips
<p><b>A7a. What are your total paint hours from the past <u>few months</u>? [12 months preferred; enter # months]</b></p> <p>_____ hours per _____ # mo</p> <p><b>b. Were numbers provided in A7a obtained through accurate records? (Answer NO if estimates.)</b></p> <p>___ Yes ___ No</p>	<p>[More easily tracked by shops than jobs.] Take six months if that's all they can get, but 12 months will be a better average across the year.</p>
<p><b>A8. Do you do any paint work using a gun with 3ounce cup or less?</b></p> <p>___ Yes ___ No</p> <p><b>If yes, please describe the types of job and frequency:</b> _____ _____</p>	<p>Useful to capture for future training and providing information on when/where using 3 oz cup is acceptable – if any limitations exist.</p> <p>That's about ½ of a Styrofoam coffee cup</p>

SECTION C: EPA NESHAP		Instructions and Tips																				
<b>SPRAY BOOTH/PREP STATION QUESTIONS</b> When we walk through the shop, it would be helpful if you could show me your spray booth and exhaust filter system.																						
<b>C1. a. Does your shop have a spray booth?</b>  <input type="checkbox"/> Yes <input type="checkbox"/> No → <i>Skip to C2</i>  <b>b. How many spray booths do you have?</b> _____	Answer YES for anything they consider a “booth”—I1 will capture description.																					
<b>C2. a. Do you have a prep station/area where coatings are applied on vehicle components?</b>  <input type="checkbox"/> Yes <input type="checkbox"/> No → <i>Skip to C3, or if NO to both C1 and C2 skip to C5</i>  <b>b. How many prep stations/areas do you have?</b>  _____	Answer YES if any area besides booth used for painting. I3 will capture description.																					
<b>C3. a. What is the estimated percentage of spray coatings that are applied in each spray booth versus any prep stations or other areas in the shop?</b>  <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 70%;">Booth or Prep Station Name/ID</th> <th style="width: 30%;">% coatings/jobs in booth</th> </tr> </thead> <tbody> <tr><td>i. Booth 1</td><td></td></tr> <tr><td>ii. Booth 2</td><td></td></tr> <tr><td>iii. Booth 3</td><td></td></tr> <tr><td>iv. Booth 4</td><td></td></tr> <tr><td>v. Prep 1</td><td></td></tr> <tr><td>vi. Prep 2</td><td></td></tr> <tr><td>vii. Prep 3</td><td></td></tr> <tr><td>viii. Prep 4</td><td></td></tr> <tr><td>Other: (describe)</td><td></td></tr> </tbody> </table>	Booth or Prep Station Name/ID	% coatings/jobs in booth	i. Booth 1		ii. Booth 2		iii. Booth 3		iv. Booth 4		v. Prep 1		vi. Prep 2		vii. Prep 3		viii. Prep 4		Other: (describe)		Note: these are estimates and will be used for informational purposes	
Booth or Prep Station Name/ID	% coatings/jobs in booth																					
i. Booth 1																						
ii. Booth 2																						
iii. Booth 3																						
iv. Booth 4																						
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vi. Prep 2																						
vii. Prep 3																						
viii. Prep 4																						
Other: (describe)																						

**SECTION C: EPA NESHP** **Instructions and Tips**

**C3. b. Did your shop first begin using each enclosure to apply coatings on or before Sept 17, 2007?**

**c. If any enclosure (paint booth, walled prep area) was installed after September 17, 2007, was the installation due to the new area source NESHP regulations?**

**Any new booth added to existing source, booth must be in compliance with NESHP – ONLY booth is treated as new source, not whole facility.**

*b. Mark an X in the box that applies for each enclosure*

c. Please note if companies that purchase and install equipment to comply with the area source NESHP, this would not make an existing source a new source per 63.11171(c)(1). If they just happened to install or start new operations, then needed to comply by Jan 8, 2008 or upon start up.

<b>C3</b>	<b>b.</b>	<b>c.</b>
<b>Booth/Prep name/ID</b>	<b>Enclosure used on or before 9/17/2007?</b>	<b>Installed to meet rule?</b>
<b>i. Booth 1</b>	Yes / No	Yes / No
<b>ii. Booth 2</b>	Yes / No	Yes / No
<b>iii. Booth 3</b>	Yes / No	Yes / No
<b>iv. Booth 4</b>	Yes / No	Yes / No
<b>v. Prep 1</b>	Yes / No	Yes / No
<b>vi. Prep 2</b>	Yes / No	Yes / No
<b>vii. Prep 3</b>	Yes / No	Yes / No
<b>viii. Prep 4</b>	Yes / No	Yes / No

**SECTION C: EPA NESHP** **Instructions and Tips**

**C4. a. Is each spray booth/prep station ventilated with an exhaust fan?**

Yes  
 No →

(i) \_\_\_\_\_ out of \_\_\_\_\_ booths/prep areas have an exhaust fan

**b. Does your exhaust system have a filter system?**

Yes  
 No → Skip to C5

CA note: Define that general building with multiple prep areas and wall fan may not be enough for compliance. A small room designed to meet same booth specifications could be OK depending on the exact circumstances.

**Depending on what EPA says about determination of room as a booth, we may tweak this instruction.**

Regardless of issue above, capture what exists without evaluating compliance in a and b.

*Enter answers in table below.*

**c. Is the filter capture efficiency rating of your exhaust/filter system at least 98 percent?**

**d. Is the documentation related to the capture efficiency of your exhaust and filter system present and available for review?**

**e. When was the filter system first used at your shop?**

Booth ID/Name	c. Capture >=98%	d. Docs?	e. Date first used
<b>i. Booth 1</b>	Yes / No / Don't Know	Yes / No	
<b>ii. Booth 2</b>	Yes / No / Don't Know	Yes / No	
<b>iii. Booth 3</b>	Yes / No / Don't Know	Yes / No	
<b>iv. Booth 4</b>	Yes / No / Don't Know	Yes / No	
<b>v. Prep 1</b>	Yes / No / Don't Know	Yes / No	
<b>vi. Prep 2</b>	Yes / No / Don't Know	Yes / No	
<b>vii. Prep 3</b>	Yes / No / Don't Know	Yes / No	
<b>viii. Prep 4</b>	Yes / No / Don't Know	Yes / No	

**f. Do ALL of the booths meet the exhaust/filter requirements in C4 at this time?**

Yes  
 No

Enter responses for c-e in Table at bottom of question.

If respondent is unsure of answers, note that this information would typically be found on the filter package or provided by the distributor. **If not purchased directly, but through a subcontractor they may need to get in touch with them to make sure what they have.**

**Must show % efficiency.**

**Acceptable proof of eff% = reference to EPA rule or list basic test criteria, even if Method not written down:**

- uses a high solids bake enamel
- delivered at a rate of at least 135 grams per minute from a conventional (non-HVLP) air-atomized spray gun
- operating at 40 pounds per square inch (psi) air pressure, and
- the air flow rate across the filter shall be 150 feet per minute

**We'll consider documentation complete if it includes: test parameters OR references the 6H rule OR the ASHRAE method.**

**Watch out to be sure documents match brand of filters in use, if possible.**



SECTION C: EPA NESHP	Instructions and Tips
<p><b>SPRAY GUN CLEANING</b>  <b>When we walk through the shop, it would be helpful if you could show me the gun cleaning area and operations.</b></p> <p><b>C5. a. Is all paint spray gun cleaning done with a fully enclosed spray gun washer or in a manner that avoids creating a mist of solvent?</b></p> <p><input type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p><b>b. If you answer YES to C5a, identify which method(s) are used:</b></p> <p><input type="checkbox"/> Fully enclosed spray gun washer  <input type="checkbox"/> Fully enclosed spray gun washer and occasionally disassemble and clean by hand  <input type="checkbox"/> Flush with solvent (but don't spray)  <input type="checkbox"/> Clean disassembled gun by hand or through mechanical methods</p> <p><b>c. If you answer YES to C5a, when was this spray gun cleaning approach first used at your shop?</b></p> <p>_____ (specific date)</p> <p><b>d. If you answered No to C5a, how do you clean your guns?</b></p> <p><input type="checkbox"/> Spray coatings and/or solvent through the gun  <input type="checkbox"/> Other (specify) _____</p>	<p><b>Using air compressor to quick dry guns after cleaning not relevant to rule, but may increase VOCs...</b></p>

SECTION C: EPA NESHP	Instructions and Tips
<p><b>PAINT STRIPPING</b> When we walk through the shop, it would be helpful if you could show me the paint stripping operation.</p>	
<p><b>C6. a. Do you use chemical products for paint stripping tasks?</b></p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No → <i>Skip to C9</i></p> <p><b>b. Do any of the chemical products you use for paint stripping contain Methylene Chloride?</b></p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No, based on shop knowledge/review → <i>Skip to C9</i> <input type="checkbox"/> No, after reviewing materials (MSDS or can) at visit → <i>Skip to C9</i></p>	<p>Some likely brands: StripRDry, Booth Floor Stripper (both made by CMA Philadelphia); Airplane stripper;</p> <p>Might be used in restoring old cars to take off layers, otherwise unlikely to need solvents – just sanding.</p> <p>Also known as di-chloromethane (DCM) or methylene dichloride – CAS # is 75-09-2</p> <p>What if shop uses MeCl to clean tables? Does rule apply to cleaning? <b>YES, since no exemptions are mentioned in the rule – only whether MeCl is used.</b></p>
<p><b>C7. a. Do you have records related to your shop’s use of paint stripping products containing MeCl?</b></p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><b>b. If there is documentation, how much product containing MeCl is used annually?</b></p> <p>_____ Gallons per year (as supported by documentation)</p>	<p>Material usage or purchase records. How many gallons of product do you use?</p>
<p><b>C8. a. Does your shop have a minimization plan for use of MeCl?</b></p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><b>b. If you use more than 2000 pounds (~150 gallons of MeCl) per year, do you have the minimization plan written and posted where paint stripping is conducted?</b></p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>If yes, Field Staff examines documentation.</p> <p>Plan should include:</p> <ul style="list-style-type: none"> <li>• Evaluate need to remove paint</li> <li>• Evaluate each application for alternatives: (non- or low-; blasting; mechanical; thermo)</li> <li>• Reduce MeCl stripper exposure to air</li> <li>• Optimize to reduce evaporation during use</li> <li>• Proper storage and disposal techniques</li> </ul> <p>If below 150 gallons, considering options for how they are using it and if they can eliminate it.</p>

SECTION C: EPA NESHP	Instructions and Tips
<b>PAINT FORMULATION/DOCUMENTATION</b>	
<p><b>C9. a. Does your shop have Material Safety Data Sheets (MSDS) and coating formulation data supplied by the manufacturer for ALL the solvents and coatings that you use?</b></p> <p> <input type="checkbox"/> Yes  <input type="checkbox"/> No                 </p>	<p>Electronic versions will be acceptable if they are easily available to employees.</p>
<p><b>C10. a. Do the coatings used by your shop contain any of the following hazardous air pollutants: chromium, lead, cadmium, nickel, or manganese (includes compounds of these metals)?</b></p> <p> <input type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Don't know                 </p> <p><b>b. If you answered No or Don't Know, have you asked your supplier whether you have the HAPs in the paint?</b></p> <p> <input type="checkbox"/> Yes  <input type="checkbox"/> No                 </p>	<p>Example of MSDS sheet that shows formulation data.</p> <p>If they answer No or Don't know, you could review a few MSDS:                      red/orange/yellow – lead, chromate                      blue/green – cadmium                      primer – chromates for corrosion resistance</p> <p>Capture whether they've attempted to determine if HAPs are present by discussion with supplier, in place of field staff going through to determine.</p>
<b>EPA RULE FOLLOW UP</b>	
<p><b>C11. Before this visit, did you know you are affected by the new EPA rule that affects autobody shops and other small paint shops? This standard applies to businesses that coat parts and vehicles and use coatings that contain chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd) or use paint stripping materials that contain methylene chloride.</b></p> <p> <input type="checkbox"/> Yes  <input type="checkbox"/> No  <input type="checkbox"/> Don't Know                 </p>	<p>This is not meant to make a determination, but to gauge their understanding at this point in time. Some may still be completely in the dark about the rule...</p>

SECTION C: EPA NESHP	Instructions and Tips
<p><b>C12. a. Are you aware that autobody shops may be able to petition out of new requirements by changing the paints they use?</b></p> <p> <input type="checkbox"/> Yes, I am aware  <input type="checkbox"/> Yes, I have submitted the petition <u>or</u> received my exemption  <input type="checkbox"/> No    <input type="checkbox"/> I would like more information on how to petition out.                 </p> <p><b>b. To petition out you must certify that you do not spray apply any coatings containing chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd) or compounds containing these metals. Given this information, do you intend to:</b></p> <p> <input type="checkbox"/> Definitely stop using coatings containing these materials and petition out.  <input type="checkbox"/> Explore alternate coatings from your supplier and decide at a later time.  <input type="checkbox"/> Continue using coatings containing these metals and comply with the rule.  <input type="checkbox"/> Not sure                 </p>	<p><b>You can you petition out of coatings requirements but still have to comply with MeCl</b></p>
<p><b>C13. a. Have you submitted an <u>initial notification form</u> (due Jan 10, 2010) to USEPA and the state, where required?</b></p> <p> <input type="checkbox"/> Yes  <input type="checkbox"/> No                 </p> <p><b>b. Have you submitted a <u>notification of compliance status form</u> (due Jan 10, 2011) to USEPA and the state, where required?</b></p> <p> <input type="checkbox"/> Yes  <input type="checkbox"/> No                 </p>	<p><b>[Illinois, Wisconsin, Ohio required; Indiana is requesting copies]</b></p>

[11 - 18]

SECTION B.i: EPA Rule TRAINING	Instructions and Tips
<p><b>B2. a. Have ALL your paint technicians been trained in proper selection, use, maintenance of spray equipment, and the requirements of the rule, within the proper time frames?</b></p> <p>___ Yes ___ No →</p> <p>(i) If no, <i>How many?</i> ___ out of ___ <i>paint techs have been trained</i></p>	<p>Add proper time frames tips to answer accurately. <b>MAKE SURE AND INCLUDE “BODY” GUYS SPRAYING PRIMERS ON THE FLOOR.</b></p> <p><b>Baseline timelines:</b></p> <ul style="list-style-type: none"> <li>• Existing – 1/10/11.</li> <li>• New – within 180 days of hire or shop start up, whichever is later; may go back 5 years for equivalent training</li> </ul>
<p><b>b. Has the training addressed and/or included the following regarding spray equipment? (read responses; check all that apply)</b></p> <p>(i) <i>Hands on and Classroom:</i></p> <p>___ Spray Gun Selection and Set Up (including measuring viscosity, selecting proper fluid nozzle or tip, achieving proper spray pattern, air pressure and volume, and fluid delivery rate)</p> <p>___ Spray gun use – (spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke)</p> <p>___ Maintenance (booth and filter - including filter selection and installation)</p> <p>(ii) <i>Classroom:</i></p> <p>___ Environmental requirements in federal NESHAP-</p>	<p>Hands on training resources vary: paint suppliers (Dupont, PPG), jobbers, associations, tech colleges, etc.</p> <p>BRING A LIST of resources? [But no official approval of training.]</p> <p><b>“Hands on” will mean some amount of actual practice with a gun, for selection, setup and use, but we will not judge the time spent on hands on.</b></p> <p>OECA is making a determination of extent of “hands on” definition.</p> <p>Owner or painter can watch DVD online and certify that they watched it/been trained for that piece. May want to have alternate video available. Michigan has video training online.</p>

SECTION B.i: EPA Rule TRAINING	Instructions and Tips
<p><b>c. Do you have records on technicians trained on the use of spray equipment?</b></p> <p><input type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p><i>c.(i) Capture who is trained, and whether equivalent work experience is being used, based on records:</i></p> <p><input type="checkbox"/> All technicians have been properly trained.  <input type="checkbox"/> Some (but not all) technicians have been properly trained or trained on all but environmental requirements  <input type="checkbox"/> None of the technicians has been properly trained  <input type="checkbox"/> Some technicians using equivalent work experience #: ___ of ___</p> <p><b>d. Are there any specific reasons paint technicians have not been trained on ALL of the topics?</b></p> <p><input type="checkbox"/> Yes  <input type="checkbox"/> No - <i>Skip to Section C.</i></p> <p><b>e. If yes to B2d, what are some of the reasons technicians have not been trained?</b></p> <p><input type="checkbox"/> no locations close by  <input type="checkbox"/> costs  <input type="checkbox"/> timing was bad (describe: _____)  <input type="checkbox"/> unaware of training requirements  <input type="checkbox"/> other: _____            _____            _____</p>	<p>Field Staff may examine documentation (certificates, dates, places) to determine whether or not the spray technicians have been properly trained (meaning they have been trained in all areas listed in question B2b. above).</p> <p><b>MAKE SURE AND INCLUDE "BODY" GUYS SPRAYING PRIMERS ON THE FLOOR.</b></p> <p>30 year expert still has to provide proof of experience.            "Owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in paragraph (f)(2) of this section are not required to provide the initial training required by that paragraph to these painters."</p> <p>Document how training has met each of the elements.</p>

**END EPA REGULATIONS...MOVE ON TO STATE REGULATIONS.**

SECTION H: COMPLIANCE ASSURANCE	Instructions and Tips												
<p><b>H4. a. Have you already received some information on this rule?</b></p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No → <i>Skip to H5</i></p> <p><input type="checkbox"/> Don't know → <i>Skip to H5</i></p> <p><b>If yes, then how and from whom?</b></p> <p><b>b. How:</b></p> <table border="0"> <tr> <td><input type="checkbox"/> Mailing/written materials</td> <td><input type="checkbox"/> Videos – training or “fact sheets”</td> </tr> <tr> <td><input type="checkbox"/> E-mail messages/documents</td> <td><input type="checkbox"/> Web training</td> </tr> <tr> <td><input type="checkbox"/> Web site</td> <td><input type="checkbox"/> Facebook/twitter/YouTube</td> </tr> <tr> <td><input type="checkbox"/> On site visit</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Training sessions/workshops</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Other (specify: _____)</td> <td></td> </tr> </table> <p><b>c. From whom:</b></p> <p><input type="checkbox"/> Coating manufacturers or suppliers</p> <p><input type="checkbox"/> Corporate environmental division</p> <p><input type="checkbox"/> Educational institutions (vocational technical school, community college, specialized training center, etc.)</p> <p><input type="checkbox"/> Environmental consultant</p> <p><input type="checkbox"/> Other auto body shops</p> <p><input type="checkbox"/> Local government (town, city, or county)</p> <p><input type="checkbox"/> OSHA</p> <p><input type="checkbox"/> Small Business Environmental Assistance Program</p> <p><input type="checkbox"/> State environmental agencies</p> <p><input type="checkbox"/> Suppliers – equipment/other</p> <p><input type="checkbox"/> Trade association</p> <p><input type="checkbox"/> U.S. EPA</p> <p><input type="checkbox"/> Other (Specify) _____</p> <p><input type="checkbox"/> Don't know</p>	<input type="checkbox"/> Mailing/written materials	<input type="checkbox"/> Videos – training or “fact sheets”	<input type="checkbox"/> E-mail messages/documents	<input type="checkbox"/> Web training	<input type="checkbox"/> Web site	<input type="checkbox"/> Facebook/twitter/YouTube	<input type="checkbox"/> On site visit		<input type="checkbox"/> Training sessions/workshops		<input type="checkbox"/> Other (specify: _____)		
<input type="checkbox"/> Mailing/written materials	<input type="checkbox"/> Videos – training or “fact sheets”												
<input type="checkbox"/> E-mail messages/documents	<input type="checkbox"/> Web training												
<input type="checkbox"/> Web site	<input type="checkbox"/> Facebook/twitter/YouTube												
<input type="checkbox"/> On site visit													
<input type="checkbox"/> Training sessions/workshops													
<input type="checkbox"/> Other (specify: _____)													

SECTION H: COMPLIANCE ASSURANCE	Instructions and Tips
<p><b>H5. a. Has your shop been inspected or visited by a government environmental or health and safety official?</b></p> <p> <input type="checkbox"/> Yes  <input type="checkbox"/> No → <i>Skip to H6</i>  <input type="checkbox"/> Don't know → <i>Skip to H6</i> </p> <p><b>b. What type of government official inspected or visited your shop? (check all that apply)</b></p> <p> <input type="checkbox"/> EPA  <input type="checkbox"/> State  <input type="checkbox"/> Local government (environmental, health or fire department)  <input type="checkbox"/> OSHA  <input type="checkbox"/> Other (specify) _____  <input type="checkbox"/> Don't know/Cannot recall                 </p>	
<p><b>H6. Is there any other information about your shop's operations that you'd like to share before we walk through the shop together?</b></p> <p>Comment:</p>	

**Now, I would like to walk through the shop.**

*(The order of these questions may have to be rearranged based on the set up of the shop.)*



**SECTION I: WALK THROUGH**

**Instructions and Tips**

**[I1 – I8 confirm compliance with NESHAP]**

**I1. a. May I see your spray booth(s)?**

*Check all that apply to each booth ID'd:*

Booth ID (separate column for each booth)	(i) Booth1	(ii) Booth2	(iii) Booth3	(iv) Booth4
Fully enclosed - roof, 4 sides (down draft or similar)				
Not fully enclosed, but has:				
no roof, 4 sides				
roof, 3 sides				
no roof, 3 sides				
roof, 2 sides				
no roof, 2 sides				
no roof or sides (open space)				
Booth has exhaust fan				
Other notes:				

**b. Is there evidence that at least some spray coating occurs outside of a spray booth?**

- Yes
- No
- Not sure (Field Staff describe: \_\_\_\_\_ )

**c. Do the spray booths ALL meet the requirements in I1 at this time?**

- Yes
- No

Comments:

*Check off booth description and mark whether exhaust present for each booth.*

Rule requires booth to have four complete side walls or curtains and a complete roof if large enough to fit a whole vehicle. Only new operations (after 9/17/07, and not done to meet rule) must comply at baseline.

Nothing in rule that says exhaust has to be outdoors, but it does need to be outside the booth (space where painting is taking place, however defined). For now, a space (garage, shed, or other) can be considered a “booth” if doors are kept closed during painting and:

- Negative pressure is maintained with sufficient make-up air, proper filtration, and venting
- Positive pressure if space has downdraft, proper filtration, and venting to outdoors
- No evidence of paint particulates outside openings

If parts are not removed, then full vehicle has to be painted in full booth (four walls/fully enclosed)

OECA is making determination on whether small building is “booth” enclosure.

**SECTION I: WALK THROUGH** **Instructions and Tips**

**[1 – 18 confirm compliance with NESHAP]**

**I2. May I see the filter on the spray booth exhaust? Is the filter in good condition? Look for rips or gaps in the filters; check to see if the filters appear to be clogged with paint residue or dust.**

*Answer YES if booth has waterwash system in place of dry filters. May not be able to see filter within waterwash system to answer “condition” question. May be installed on enclosed, positive pressure downdraft booths.*

Booth ID	a. Has Filter?	b. Condition? (write in good or poor; NA if no filter present)	c. Exhaust pressure (positive or negative to room)
<b>i. Booth 1</b>	Yes / No		
<b>ii. Booth 2</b>	Yes / No		
<b>iii. Booth 3</b>	Yes / No		
<b>iv. Booth 4</b>	Yes / No		

**d. Do the spray booth exhaust/filter systems ALL meet the requirements in I2 at this time?**

- Yes
- No

**Comments:**

Field Staff performs visual inspection of booth and filter and determines whether or not there is a particle filter on the exhaust.

Note to Field Staff: you may see a wall fan and small box with filter. Waterwash booths will not have the same type of filters to observe.

If the filters are not in good condition, Field Staff should ask the shop to revisit manufacturer’s recommendation.

Good = not Poor. Poor will be pretty bad, e.g. holes, rips, gaps, no air movement at all.

Power up booth to evaluate pressure.

Positive only allowed for “downdraft” designed booth – fully enclosed, hard walls, and exhaust in floor.

Anything else must have negative, even 4 curtains and roof with air inflow above and exhaust at floor level. Negative should be “felt” standing at openings.

Mobile operation/enclosure should be observed as well. Try to see it, even if not in operation.

When looking at filters, look for evidence of painters clearing guns into the filters. This would look different than any patterns left on the filters by protective grates.

**SECTION I: WALK THROUGH** **Instructions and Tips**

**[[1 – 18 confirm compliance with NESHAP]**

**I3. a. May I see your prep station(s)/area(s) where painting is done?**  
*If no prep station/area(s) present, skip to I5.*

**Check all that apply to each area ID'd:**

Prep Area ID (separate column for each area/station)	(i) Prep 1	(ii) Prep 2	(iii) Prep 3	(iv) Prep 4
Fully enclosed - roof, 3 sides				
Not fully enclosed, but has:				
no roof, 3 sides				
roof, 2 sides				
no roof, 2 sides				
no roof or sides (open space)				
Prep area has exhaust fan				
Other:				

**b. Do the prep stations/areas ALL meet the requirements in I3 at this time?**

Yes

No

Comments:

Field Staff performs visual inspection to confirm that prep station/area(s) is enclosed and ventilated.

Rule requires for motor vehicle and mobile equipment subassemblies, any coatings must be spray applied in a booth with a full roof and at least three walls or side curtains. Only new operations (after 9/17/07, and not done to meet rule) must comply at baseline.

Remember that painting part(s) of a car without disassembling from the whole car requires the whole car to be painted inside a 4-walled booth.

“Spot” painting with an encircling ring which draws spray into the ring and then directs it through proper filtration is permitted by the rule.

**SECTION I: WALK THROUGH** **Instructions and Tips**

**[1 – 18 confirm compliance with NESHAP]**

**I4. May I see the filter on the prep station(s)/area(s) exhaust?** *Is the filter in good condition? Look for rips or gaps in the filters; check to see if the filters appear to be clogged with paint residue or dust.*

Prep Station/Area ID	a. Has Filter?	b. Condition? (write in good or poor, or NA if no filter)	c. Exhaust pressure (positive or negative to room)
(i)	Yes / No		
(ii)	Yes / No		
(iii)	Yes / No		
(iv)	Yes / No		

**d. Do the prep station/area exhaust/filter systems ALL meet the requirements in I4 at this time?**

- Yes
- No

**Comments:**

Field Staff performs visual inspection of pipe and filter and determines whether or not there is a particle filter on the exhaust

Note to Field Staff: you may see a wall fan and small box with filter.

If the filters are not in good condition, Field Staff should ask the shop to revisit manufacturer's recommendation.

Doesn't have to be exhausted outdoors, but it does need to be outside the booth (space where painting is taking place, however defined).

Negative should be "felt" standing at openings – even at 3 wall booth, should feel breeze, papers flap toward back of booth, something.

May be good to have hand out for facilities to what to do.

**I5. Field Staff:** *Is lighting in the booths/paint areas clean of paint residue, besides what may be present from the most recent job?*

- Yes
- No

Based on own observations. Overspray may be indication of poor ventilation.

**SECTION I: WALK THROUGH** **Instructions and Tips**

**[1 – 18 confirm compliance with NESHAP]**

**16. a. May I see the spray guns you have in the shop?** *(Check all that apply, or if multiple of same gun, fill in separate lines; include guns not in regular use but available)*

Spray Gun	Manufacturer/ Model (X = if gun is stamped HVLP)	Have Docs? Y/N
HVLP (High Volume Low Pressure)	1.	
	2.	
	3.	
	4.	
	5.	
	6.	
HVLP Equivalent	1.	
	2.	
	3.	
	4.	
	5.	
	6.	
Electrostatic		
Airless spray gun		
Air assisted airless		
Conventional (non-compliant)		
Other:		
Don't know		

**b. Do they have only compliant spray guns, based on the requirements for 6H, available for use at this time?**

Yes  
 No  
 Comments:

Field Staffs: Look for "HVLP" stamped on the body of the spray gun. If no stamp is visible, air flow of 15-26 cubic feet per minute and PSI at orifice of less than 10 lbs, or at inlet of less than 40 lbs is likely to be an HVLP spray gun. You can also look at purchase records or manuals for indicators of whether a gun is HVLP or not. May want to take HVLP list along with us.

**DO NOT EVALUATE HVLP GUN STATUS BASED ON USE OR TECHNIQUE. Not in the scope of the project.**

Look at all guns, even if not used. RECOMMEND removing any non-approved guns.

Rule preamble does indicate CA approved guns are OK for HVLP-equivalent. We will use those, and anything else would need separate EPA approval to qualify.

- Conventional: >40 psi and spray 10-12 inches away from vehicle.
- HVLP: <40 psi and spray 8-10 inches from vehicle.

Strong recommendation that any non-compliant guns should be removed from shop by next year compliance deadline.

**Manufacturer/Model:** only enter info if unsure of HVLP/equivalent status – if shop say it is but not on list or stamped. Just check box if HVLP is obvious.

**Documentation:** answer yes or no if document was presented for an HVLP equivalent gun. (List of guns provided separately.)

SECTION I: WALK THROUGH	Instructions and Tips
<b>[[1 – 18 confirm compliance with NESHAP]</b>	
<p><b>17. May I see the gun cleaning area, operations? Explain to me what you do here.</b></p> <p><i>Field Staff observes cleaning procedures and categorizes cleaning technique:</i></p> <p><input type="checkbox"/> Uses a fully enclosed spray gun washer</p> <p><input type="checkbox"/> Uses a fully enclosed spray gun washer and occasionally disassembles and cleans by hand</p> <p><input type="checkbox"/> Flush with solvent (but don't spray)</p> <p><input type="checkbox"/> Spray coatings and/or solvent through the gun</p> <p><input type="checkbox"/> Clean disassembled gun by hand or through mechanical methods</p> <p><input type="checkbox"/> Other (specify) _____</p>	<p>Look for any evidence of painters clearing paint from guns into the ventilation hoods or other areas with or without filters.</p> <p>Not required by rule (possibly by OSHA?), but we can suggest that air flow from above and behind the cleaning station/technician to below and in front of the station/technician (drawing fumes away from the technician's face).</p>
<p><b>18. a. Does chemical paint stripping occur in the shop?</b></p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No → <i>Skip to 19</i></p> <p><b>b. If yes, ask: May I see the products you use for paint stripping?</b></p> <p><i>Examine products for ingredients with methylene chloride. Do they contain MeCl?</i></p> <p><input type="checkbox"/> Yes, products with methylene chloride are used</p> <p><input type="checkbox"/> No, products with methylene chloride are not used</p>	<p><b>Look at MSDS sheets and/or cans. May want to note whether response matches office visit response.</b></p> <ul style="list-style-type: none"> <li>• Also known as di-chloromethane (DCM) or methylene dichloride</li> <li>• Chemical Abstracts Service (CAS) Registry Number is 75-09-2</li> <li>• Advice for you and shops: read the label or MSDS and don't trust your sense of smell (you may only start smelling MeCl at 200 ppm)</li> </ul>
<p><b>Thank you for your time.</b></p>	<p>Close inspection as appropriate.</p>