

RICK CARLESKI'S NOTES

2/26/08 MEASUREMENT NESHAPP PAINT STRIP, MOTOR COAT. CONF CALL.

EPA: SHARON NIZICH, WARREN JOHNSON MARY Z., KIM TGR

HISTORY - TECHS WORKED W/ W. JOHNSON, K. TGR

§ MOTOR HARPS → FOCUS OF PAINTING

PAINT STRIP + AUTO BODY, + MISC MOTOR PARTS INCLUDE PLASTIC

MOBILE EQUIPMENT, ~~WATER~~ MOTOR VEHICLE DEFINITIONS INCLUDE GOLF CARTS
MOTORCYCLES,

EXCLUDED HOBBYISTS, FACILITY MAINTENANCE, FIELD MOBILE EQUIPMENT

EXCLUDED COATINGS

NEW SOURCE - HAS EXCEPTIONS FOR MAKING NEW BOOTH TO EXISTING PAINTING FACILITY.

EXIST. SOURCE - THREE YEARS TO COMPANY.

BOOTH REQ'D DIFFERENT FOR WHOLE VEHICLES VS. JUST PARTS

↑ 4 HOURS

↑ 3 HOURS

TRAINING REQ'D - OWNERS CAN DEVELOP THEIR OWN PROGRAM TO MEET CRITERIA.

Q: CAN OARPS DO APPLICABILITY DETERMINATION MEMO? → NO, OECA DOES THIS
BUT CAN CONSULT WITH OARPS.

RECORDKEEPING

NOTIFICATION - NEW SOURCES = 180 DAYS ⇒ JULY 2008, EXISTING = 1/9/10
(2 YEARS AFTER)

Q&A FORUM

NOTIFICATION

Q: DOES EPA HAVE SYSTEM FOR LOGGING NOTIFICATIONS THAT STATES CAN SEE?
KIM - DON'T KNOW. PAGE 10 SNA TRYING PROBABLY. MAY BEHOLD ON STATES
ACCEPTING DELEGATIONS.

SPRAY GUN CLEANING

Q: CAN SPRAY GUNS BE CLEANED BY SPRAYING INTO CLOSED CONTAINER? ⇒ CAN NOT BECAUSE ⇒
NEEDS TO ASK OECA.

Q: GUNS W/ LGS THAN 3 OZ. CAP SIZE ⇒ RR. SAYS THIS CONFLICTS WITH OTC RULES. →

Q: WHAT ARE OBLIGATIONS W/OSHA RULES LIKE BOOTH CURTAINS, FAN SIZE, ETC.?

SOME NESHAP REQ'S SEEM TO

Q: OPT-OUT PROVISIONS?

1. METAL/PLASTIC - NO FORMAL PETITION NEEDED

2. AUTO BODY - MUST PETITION EPA → EPA HASN'T DEVELOPED METHOD YET
NEED TO ASK EPA ABOUT THIS → GA HAS DRAFTED FORM TO PETITION 4

WARREN J. = 63 111 73 ENV. STAT. PARAGRAPH b LAST SENTENCE FACILITIES
← 1 TON MUST HAVE MINIMIZ. PLAN. RET. → WAS CORRECTED IN 2/13/08 FR.

Q: ARE TRUCK BGS LINER COATINGS COVERED? → HAVE REF IN DEFINITIONS, NOT IN RULE → ASK DECA.

Q: JOBS COMM. COURSE/TRAINING SCHOOLS EXCLUDE METAL REFINISH SHOPS FOR
REAL VEHICLES, NOT JUST TRAINING? → DON'T KNOW. → SHOULD ASK DECA.

OUTREACH DISCUSSION FOR NESHAP

1. GA'S PETITION FORM FOR NON-METAL HAP COATINGS.

COLORADO FACT SHEET

REG IV TRAINING

REG X → NOTIFICATION FORM; NEEDS APPROVAL YET. RTP CAN CREATE
EXAMPLES, BUT NOT "OFFICIAL" FORMS

REG IV → TN DRAFTED FORMS TO REG IV → EPA SAID "OK" BUT NOT FORMAL
APPROVAL

NOTE: HAVE VIDEO OF AKZO-NOBEL TO DESCRIBE RULE IN DIFFERENT LANGUAGES
_{FOOTAGE} _{ACTIVITY IN MO.}

EPA MIGHT REVERSE THROUGH APTI. CONTACT HOLLY WILSON - CRC

(WAS NOTICED IN EPA RULE FACT SHEET).

GA: WORKING ON SELF-AUDIT CHECKLIST.

* WARREN J. → ARI CLEARER AMENDMENTS ① PARAGRAPH (b) CROSS REFERENCES WERE

NOT CORRECT; ② MONITORING CONDENSED → PRESSURE GAUGE OR TEMPERATURE OR, IT
DOESN'T GIVE PREFERENCE TO DP GAGES. EPA PRESENTLY WAITING ON LITIGANTS
OK TO PROCEED AS DIRECT FINAL FR NOTICE. ③ MOVING MACHINES → REG 1 MTRG DETERMINATION

HHA INSTRUMENTS FOR 25 ppm → \$200.
→ INTEGRATED FOR CFC DETERMINATION, NOT PERC.

RICH R. SAID \$795 FOR "CERTIFIED" APM MEASURING DEVICE.
FOR PERC GAS ANALYZER (PID)