

# **Instruction for use of “Initial Notification” Form**

(Applicable to **new** paint stripping operations)

## **General**

This form may be used by facilities that operate **new** paint stripping operations that use chemical strippers containing methylene chloride to comply with the initial notification requirements in 13.5.1 of Regulation 1138. The use of this form is optional. However, other means of notification must contain the information required under 13.5.1.1 through 13.5.1.9 of Regulation 1138.

“New source” means a miscellaneous parts or products surface coating operation that was not actively engaged in miscellaneous parts or products surface coating operations prior to September 17, 2007.

## **Required Submittal Date**

The owner or operator shall submit an “Initial Notification” to the Department (with copy to the U.S. Environmental Protection Agency) no later than 180 days after initial startup or October 11, 2010, whichever is later.

The addresses for these submittals are provided below and in Item 9 of the “Initial Notification” form.

## **Items 1 and 2**

Provide the name of the affected paint stripping operations, its physical location, and the address where compliance records are kept, if different than the physical location of the facility.

## **Items 3**

Identify the owner or operator of the facility where paint stripping operations occur, identified in Items 1 and 2, and provide the owner or operator’s mailing address.

## **Item 4**

The owner or operator of the affected paint stripping operations indicates (checks appropriate box) whether the facility is subject to the provisions of Section 13 of Regulation 1138. The facility is subject to Section 13 if both of the following statements are applicable.

### **1. The facility is an area source.**

“Area source” means any stationary source or group of stationary sources located within a contiguous area and under common control that does not emit nor have the potential to emit considering controls, in the aggregate, 10 tons per year or more of any hazardous air pollutant (HAP) and 25 tons per year or more of any combination of hazardous air pollutants (HAPs).

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2. **The facility performs paint stripping using chemical strippers that contain methylene chloride (MeCl) for the removal of dried paint (including but not limited to, paint, enamel, varnish, shellac, and lacquer) from wood, metal, plastic, and other substrates.**

### Item 5

The owner or operator of the affected paint stripping operations identifies (checks appropriate box) whether the facility expects to use more than one (1) ton of methylene chloride (100% basis) annually after the new source compliance date (initial startup).

**For example**, if a facility expects to use **no more than** 5000 pound per year of a chemical stripper that contains 40% MeCl, the facility would check “No”.

$$5000 \text{ lbs/yr times } 0.4 \text{ MeCl} = 2000 \text{ lbs MeCl or } 1 \text{ ton/yr.}$$

In this example, the owner or operator would check “Yes”, if the facility expects to use more than 5000 pound per year of a chemical stripper that contains 40% MeCl.

### Item 6

The owner or operator of the facility where paint stripping operations occur identifies (checks appropriate box) whether the paint stripping operations at the facility is a new source or an existing source.

- An affected source is **new**, if the facility was not actively engaged in paint stripping operations prior to September 17, 2007.
- An affected source is **existing**, if the facility was actively engaged in paint stripping operations prior to September 17, 2007.

### Item 7

The owner or operator of the affected paint stripping operations provides a brief description of the paint stripping operation. The description must include the method or methods of paint stripping used (e.g. chemical, mechanical or both) and the types of substrates stripped (e.g. wood plastic metal, etc.).

### Item 8a

Requirement 13.4 of Regulation 1138 provides the requirements that the owner or operator of an affected paint stripping operations must be in compliance with to satisfactorily demonstrate initial compliance with Section 13 of Regulation 1138.

For this form, the owner or operator would certify initial compliance with Section 13 of Regulation 1138 by checking the appropriate boxes listed under Item 8a.

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### **Item 8b**

The owner or operator of the affected paint stripping operations certifies that the “Initial Notification” is true, accurate, and complete as demonstrated by the completion of Item 8c.

### **Item 8c**

The owner or operator of the affected paint stripping operations provides the information needed and signs the form to certify the truth, accuracy, and completeness of the notification.

### **Item 9**

The owner or operator must submit the completed “Initial Notification” to the Department of Natural Resources and Environmental Control (with a copy to the U.S. Environmental Protection Agency) at the addresses provided below and in Item 9 of the form. The owner or operator should keep a copy of the completed form.

### **Submit the Initial Notification to the following addresses**

Delaware Department of Natural Resources and  
Environmental Control  
Director, Division of Air Quality  
Blue Hen Corporate Center  
655 S. Bay Road, Suite 5N  
Dover, DE 19901

U. S. Environmental Protection Agency  
Director, Air Protection Division  
1650 Arch Street  
Philadelphia, PA 19103

# Initial Notification

## Regulation 1138 – Section 13

### Emission Standards for Area Source Paint Stripping Operations

For  
New  
Sources

**Submittal Date:** The “Initial Notification” must be submitted no later than 180 days after initial startup or October 11, 2010, whichever is later.

[1] **Name of the facility:** \_\_\_\_\_

[2] **Physical location – Street Address:** \_\_\_\_\_

City, State, Zip Code : \_\_\_\_\_

**Address where compliance records are kept, if different than the physical location**

Street Address: \_\_\_\_\_

City, State, Zip Code: \_\_\_\_\_

[3] **Name of Owner or Operator:** \_\_\_\_\_

Mailing Address: \_\_\_\_\_

City, State, Zip Code: \_\_\_\_\_

[4] **Is the facility subject to Section 13 of Regulation 1138?**

Check appropriate box

Yes  No

[5] **Does the facility plan to use more than one ton of methylene chloride (MeCl) annually after January 10, 2011?**

Check appropriate box

Yes  No

[6] **Is the paint stripping operation a new affected source or an existing affected source?**

Check applicable box

New affected source  
 Existing affected source

[7] **Provide a brief description of the paint stripping operation. The description must include the method or methods of paint stripping used (e.g. chemical, mechanical or both) and the types of substrates stripped (e.g. wood plastic metal, etc.).**

# Initial Notification

## Regulation 1138 – Section 13

### Emission Standards for Area Source Paint Stripping Operations

For  
New  
Sources

Name of the facility:

[8] **Certification of Initial Compliance**

- a The owner or operator of the affected paint stripping operations shall certify initial compliance with Section 13 of Regulation 1138 by checking (√) the following compliance statements, where appropriate.

**Certify initial compliance for new paint stripping operations by checking appropriate boxes**

The owner or operator certifies that the affected paint stripping operations are in compliance with all applicable requirements of Section 13 of Regulation 1138.

The owner or operator certifies that this “Initial Notification” serves as the “Notification of Compliance Status” in accordance with 13.5.1.8.

If the facility expects to use over one ton of MeCl annually, the owner or operator certifies that a written methylene chloride minimization plan has been developed and is being implemented in accordance with the requirements of 13.4.2.

- b **I certify that all the information contained in this notification is true, accurate, and complete.**

c Signature: \_\_\_\_\_ Date : \_\_\_\_\_  
Title/Position: \_\_\_\_\_ Telephone No: \_\_\_\_\_  
Email Address: \_\_\_\_\_  
Printed Name: \_\_\_\_\_

- [9] **The owner or operator must submit this “Initial Notification” to the following agencies by the submittal date provided on page 1 of this form. Remember to keep a copy of this notification.**

Delaware Department of Natural Resources  
and Environmental Control  
Director, Division of Air Quality  
Blue Hen Corporate Center  
655 S. Bay Road, Suite 5N  
Dover, DE 19901

U. S. Environmental Protection Agency  
Director, Air Protection Division  
1650 Arch Street  
Philadelphia, PA 19103