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January 29, 2010

Subject: Envirobase High Performance Waterborne Basecoat HAP Exemption Under EPA's Area Source Rule

In the past two years, body shops have been impacted by new air quality regulations implemented in California and across the country. The South Coast AQMD, Bay Area AQMD, San Joaquin Valley Unified APCD and other air districts in California now have regulations calling for 3.5 lbs VOC/gal basecoat. The federal EPA has enacted a NESHAP for Paint Stripping and Miscellaneous Surface Coatings Operations at Area Sources (40 CFR Part 63 Subpart HHHHHH), which regulates operations that spray-apply coatings on plastic and metal substrates.

Waterborne products such as Envirobase High Performance (EHP) are popular solutions to California's low-VOC requirements. Even in areas of the country where they are not mandated, waterborne basecoats have gained traction, so PPG frequently receives customer inquiries about whether its EHP Waterborne Basecoat meets the requirements for an exemption from the federal NESHAP.

The NESHAP applies to facilities that use coatings which contain MSDS-reportable levels of "target heavy metal HAPs" (lead, chromium, manganese, nickel and cadmium) and/or use methylene chloride-containing products in stripping operations. These MSDS-reportable levels are 0.1% by weight for listed carcinogens and 1.0% by weight for other listed substances. Refinish facilities that wish to apply to EPA for an exemption from the NESHAP cannot use coatings that contain the target heavy metal HAPs at levels equal to or greater than the levels above, or methylene chloride-based strippers.

While a limited number of specialty effect toners (T4020-T4026) contain elemental chromium, the percentage by weight is below the U.S. MSDS-reportable level of 1.0% by weight for that substance. When these specialty effect toners are used in color formulas, the weight percentage of elemental chromium is further reduced. A quick check of the EHP Basecoat MSDS, which can be found on the PPG NA website at www.ppgrefinish.com, will confirm that none of the target HAPs are listed at levels that would be "MSDS-reportable" in the U.S. You can read the MSDS by clicking on "Safety & Health" in the gray toolbar at the top of the page and then on "MSDS Search", and then entering EHP under product code.

Use of EHP Waterborne Basecoat should not prevent an application for an exemption from the federal NESHAP because it does not contain MSDS-reportable levels of the target heavy metal HAPs.

For additional assistance, please use the PPG NA website or contact your local PPG distributor.

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