



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

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[www.epa.gov/region8](http://www.epa.gov/region8)

Ref: 8ARD-PM

Michael Moss  
Gingerminion DBA Colors on Parade  
106 Ridge Lane  
Bailey, Colorado 80421

Re: Petition for Exemption from 40 CFR Part 63, Subpart HHHHHH

Dear Mr. Moss:

This letter is in response to your May 11, 2020 petition for exemption from the motor vehicle and mobile equipment surface coating requirements of the National Emission Standard for Hazardous Air Pollutants, Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR part 63, subpart HHHHHH (Subpart HHHHHH) for the Gingerminion DBA, Colors on Parade mobile operation that operates within Colorado and maintains records at 106 Ridge Lane, Bailey, Colorado. The U.S. Environmental Protection Agency grants your petition for exemption.

To obtain an exemption, 40 CFR 63.11170(a)(2) requires that as the owner or operator of a motor vehicle surface coating operation you demonstrate, to the EPA's satisfaction, that you spray apply no coatings that contain the target hazardous air pollutants (HAP), as defined in 40 CFR 63.11180. The petition must include a description of the coatings that you spray apply and your certification that you do not spray apply any coatings containing the target HAP.

Based upon the information provided in your petition for Gingerminion DBA, Colors on Parade and your signed certification that none of the coatings sprayed at this facility contain the target HAP, the Gingerminion DBA, Colors on Parade facility that operates within Colorado and maintains records at 106 Ridge Lane, Bailey, Colorado is exempt from the Subpart HHHHHH requirements for its spray-applied coating activities, but it must still comply with any applicable requirements of paint stripping when using methylene chloride.

Keep a record of the exemption on site at your operation for as long as you perform motor vehicle and mobile equipment surface coating operations. The Agency notes that a subset of the PPG brand paints you list target HAPs in their safety data sheets (SDS). If circumstances change such that you intend to spray apply coatings containing any target HAP, the owner or operator must submit the initial notification required by 40 CFR 63.11175 and comply with the requirements of Subpart HHHHHH.

This exemption is based on information that you have provided to the EPA. Nothing in this exemption shall be construed as limiting the ability of the EPA or delegated agencies to pursue enforcement action, if it is determined that you were not eligible for this exemption or for any other violations under the Clean Air Act. Providing false information to a federal official is a criminal violation pursuant to federal law, 18 U.S.C. Section 1001.

If you have any questions regarding this response, please contact Daniel Fagnant, of my staff, at (303) 312-6927 or at [fagnant.daniel@epa.gov](mailto:fagnant.daniel@epa.gov).

Sincerely,

12/14/2020

 Carl Daly

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Signed by: CARL DALY

**Carl Daly**  
Acting Director  
Air and Radiation Division

cc: Christine Hoefler, Colorado Department of Public Health and Environment  
Elizabeth Pilson, Colorado Department of Public Health and Environment