

August 30, 2012

**Carcoon USA**  
**P O Box 331193**  
**Atlantic Beach, FL 32233**

RE: 1) EPA Miscellaneous Surface Coating Operations at Area Sources Rule  
2) Mobile Paint Booth – Carcoon CSS Workstation Model CPB-30

To whom it may concern:

GRC- Pirk Management company has been retained by Carcoon USA to evaluate the compliance of Carcoon mobile enclosure equipment with the U.S. Environmental Protection Agency (EPA) National Emission Standards for Hazardous Air Pollutants Rule: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources 40 CFR 63 Subpart HHHHHH published 73 FR 1759, January 9, 2008 (also referred to herein as “HAPs 6H”)

In accordance with the American Society for Testing and Materials “ASTM 1527” standards and government guidelines required to identify regulatory compliance, and pollution prevention assessments, we have examined the information necessary to accomplish the environmental assessments requested of us, including a review of the applicable codes, rules and standards pursuant to:

40 CFR Section 63.11173 paragraph (e)(2)(i) All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, “Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992”

40 CFR Section 63.11173 paragraph (e)(2)(ii) Spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. However, if a spray booth is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to, but not more than, 0.05 inches water gauge positive pressure.

In cooperation with U.S. Environmental Protection Agency testing protocols and engineering standards, our findings are as follows:

1. We have tested and evaluated the equipment and written specifications provided to us for Carcoon CSS Workstation Model CPB-30. Accordingly, the Mobile Paint Booth meets and exceeds the requirements of 40 CFR Section 63.11173 paragraph (e)(2)(i) for the use of filter technology that achieves at least 98-percent capture of paint overspray. Viz., PAINT ARRESTANCE FILTER TEST REPORT R 042 T 079, January 8, 1997, per ASHRAE Method 52.1 has been digitally certified for authenticated copies upon request.
2. We have tested and evaluated the equipment and written specifications provided to us for Carcoon CSS Workstation Model CPB-30. Accordingly, the Mobile Paint Booth meets and exceeds the requirements of 40 CFR Section 63.11173 paragraph (e)(2)(ii) for Spray booth operation to refinish complete motor vehicles or mobile equipment as a fully enclosed containment system with a full roof, four complete walls, and ventilated at negative pressure so that air is drawn into any openings in the booth walls. Viz., AIR BALANCE DIFFERENTIAL PRESSURE TEST REPORT N<sup>o</sup> 1699, August 6, 2012, per National Environmental Balancing Bureau Certification N<sup>o</sup> 3459 has been digitally certified for authenticated copies upon request.
3. The Carcoon CSS Workstation Model CPB-30 is a Limited Finishing Workstation intended to be operated in accordance with the requirements of NFPA 33-12.3.1 through 33-12.3.9 where dangerous quantities of flammable or combustible vapors, mists, residues, dusts, or deposits are present as a result of spray processes in either enclosed or unenclosed areas. The Model CPB-30 meets or exceeds the applicable requirements of NFPA 33 Chapters 2 through 8 and Chapter 16, Section 12.3.4. The Model 5410 workstation conforms to the requirements of NFPA Standard 33 Section 12.3 including, but not limited to: (1) A dedicated make-up air supply and air supply plenum; (2) Containment materials consisting of limited combustible material, as defined in NFPA 220; (3) A dedicated mechanical exhaust and filtration system; (4) An approved automatic extinguishing system that meets the requirements of NFPA 33-12.3.2; (5) Interlocking capability to connect the exhaust ventilation system with the spray application equipment; (6) Exhaust fans and drives designed and integrated as per NFPA 33 Section 5.10.1.
4. Best Management Practices "BMPs" for Carcoon CSS Workstation Model CPB-30: (1) The amount of material sprayed shall not exceed 1 gal (3.8 L) in any 8-hour period; (2) Enclosure shall be fully closed during any spray application operations; (3) The area inside the enclosure shall be considered a Class I, Division 1 or Class II, Division 1 hazardous (classified) location, as defined by NFPA 70, National Electrical Code; (4) The hazardous location shall extend horizontally and vertically beyond the volume enclosed by the outside surface of the curtains as follows: (a) Five feet (1525 mm) horizontally and 3 feet (915 mm) vertically if the spray application equipment is interlocked with the exhaust ventilation system, or (b) Ten feet (3050 mm) horizontally and 3 feet (915 mm) vertically, if the spray application equipment is not interlocked with the exhaust ventilation system; (5) Interlocked shall mean that the spray application equipment cannot be operated unless the exhaust ventilation system is operating and functioning as designed and spray application is automatically stopped if the exhaust

ventilation system fails; (6) The ventilation system air movement shall remain in operation for the prevention of fire and explosion as long as flammable or combustible materials are at issue; (7) The air flow of the ventilation system is considered adequate if the air movement is sufficient to prevent accumulation of significant quantities of vapor-air mixtures in concentrations over one-fourth of the lower flammable limit, e.g., 30:1.6; and, (8) The workstation operation shall be separated from other operations by a minimum distance of 3feet (915 mm) or by a partition, wall, or floor/ceiling assembly having a minimum fire resistance rating of 1 hour.

We have examined and evaluated the Carcoon CSS Workstation Model CPB-30 and determined that the equipment represented is in accordance with the applicable Miscellaneous Surface Coating Operations at Area Sources 40 CFR Part 63 rules and regulations for spray booth compliance.

Respectfully submitted,

*GRC-Pirk Management Company*

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Steven E. Schillinger  
Registered Environmental Assessor

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Authentication:

To: \_\_\_\_\_  
Company and/or Individuals Name

Attested: **Carcoon USA**

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Signature Title Date