

FREQUENTLY ASKED QUESTIONS

What do I need to do?

A shop must have an environmental “permission” to spray paint. In the past this was called a Certificate of Approval or CofA. After October 31, 2011, most shops can qualify for a much more simplified and less expensive Registry

What is a Certificate of Approval (CofA)?

This is an “instrument” issued by the Ontario Ministry of Environment that specifies what activities (paint use, stack height, booth air movement, distance from neighbours etc., that you must follow. Each shop is different.

What is the Environmental Registry?

Similar instrument but now the entry rules are consistent and simpler, the operating standards are the same for each shop, it is predictable, better understood and less expensive and much less time consuming to obtain. Most Ontario shops would qualify for the Registry.

What are the eligibility requirements to be in the Registry?

There are four:

- 1) The number of spray booths and the rate at which coatings are used. These limits depend on whether the facility occupies all or part of a building. If the facility occupies all of the building the facility must:

Have a least one and no more than three spray booths and spray no more than six liters of coatings in total per hour. (If you have one booth with an indoor fan, then no more than 2 liters per hour is maximum rate otherwise distance separation is higher)

For facilities in a building that contains more than one unit e.g. –multi-tenanted buildings, the facility must have:

Only one spray booth and spray no more than two liters per hour. If there is another spray booth in the multi-tenanted building, a shop should call us at 1-866-309-4272.

- 2) Distances between the facility’s exhaust stacks and property lines, and the distance between the facility’s stacks or outdoor fans and neighbours . This distance is called setback. The minimum setback for your facility depends on: the number of spray booths, whether exhaust fans are located indoors or outdoors, the amount of coatings applied per hour and the use of acoustic barriers. Most shops with one booth, and an indoor fan and using less than 2 liters per hour will need at least 40 meters of space between their stack and the residential neighbour’s lotline.

- 3) Waste water must be managed appropriately e.g.- it goes to a municipal sanitary sewer.
- 4) A permit issued by the Niagara Escarpment Commission (if you are within their jurisdiction area). Permit conditions must not conflict with the requirements of the Registry.

What if I exceed the paint use requirement level?

That would be highly unusual to be over 6 liters an hour. If you are, then you would not qualify for the Registry and must apply for the “old” Certificate of Approval (CofA)

What if I have more than three booths?

Three booths is the Registry maximum. You must apply for a CofA. It is also over the Certificate of Approval simplified limit as well, so a process called Emission Summary and Dispersion Modeling must now be used. You should call us for details.

What if I am too close to a residential use area?

You would not qualify for the Registry. You must apply for a Certificate of Approval.

What if I am in a multi-tenanted building that already has a booth in one of the units?

You would not qualify for the Registry. You must apply for a Certificate of Approval.

Do I need to register if I already poses a current valid Certificate of Approval?

If your current CofA includes the waterborne or low-VOC product that you are now using, then you need not do anything.

What is the 5 year time limit?

Oct. 31, 2016 is the time limit when shops that have an “old” CofA must transfer to the Registry but only if they meet entry requirements. Otherwise they simply continue using the “old” CofA.

Why do I have to update the Registry annually ?

This is to determine if there are any changes in equipment or product. Your association can help with that and check with you each year and handle that reporting.

What do I do if I need an amendment to my CofA?

There are options here. If you meet the Registry entry requirements then you would be better to apply to the Registry. If you do not meet the Registry entry requirements then you would apply for an amended Certificate of Approval. If you meet the Registry entry requirements but not the operating requirements or can't meet them, then you should call us.

What is the difference between an entry requirement and an operating requirement?

The four entry requirements are consistent for all shops. If you meet these four standards then you are eligible for inclusion in the Registry. If you meet these standards, a Certificate of Approval can NOT be issued and you MUST proceed unless you have a problem with the operating requirements.

What are the operating requirements?

The operating requirements are:

- You must use waterbased or low-VOC product that meets the new federal guidelines. Use of non low-VOC product after October 31, 2011 is not allowed
- Your facility must continue to meet registration requirements
- Your registration remains up-to-date
- You or your association confirms yearly that the information in your registration is complete and accurate
- Use operation and maintenance of specified equipment at the facility
- Exhaust stack configuration (the stack should be 1.5 times the building height)
- Hours that coatings can be applied (7:00 a.m. to 7:00 p.m.) and specified fans used
- Efficiency standard for the spray guns and the booth filters
- Record keeping kept up-to-date
- Training requirement met

What training?

All painters and at least one management person from each shop must successfully complete a training program. The association training program is easy to do at the shop or at home and meets the standards required. Over 1000 students have taken the course in Ontario so far. Just call us at 1-866-309-4272 and we can help you meet this requirement.

Can I register my spray booth if I do not meet the operating requirements?

Yes, but you need, once the Registry approval has been received, to then modify equipment or process to meet the compliance operating requirements. We are awaiting an answer from the Ministry if you are a shop that is unable to meet registry operating standards, yet can meet the entry standards .

What do I do if I am unable to meet Registry entry requirements but need an approval?

Apply for a Certificate of Approval

What do I do if I have a CofA and I do not meet Registry entry standards and need an amendment?

Apply for an amended Certificate of Approval

What do I do if I have a CofA and I do meet Registry operating standards but not operating standards?

We are awaiting an MOE reply to our question

Can the Ministry demand me to change my application or deny it?

They can ask for clarity, can reject the application on grounds, or force an applicant that is using the Registry to obtain a Certificate of Approval instead. Often the reasons for this are based on a complaint history, an abatement order or noise concern.

What about other local environmental approvals?

Currently only the Town of Oakville (shop report due March 2011) and the City of Toronto (shop report due June 2012) have additional reporting requirements. Your trade association is handling Oakville applications for shops and has a written agreement with the City of Toronto to assist shops with their program. If you are in either of these two municipalities, you should call us for further information.

What are the costs?

You can go to the Service Ontario web site and complete this work yourself or you can ask your Association to handle this for you. Our fee is \$300 plus HST for a registry inclusion for members and \$500 plus HST for non-members (Yes- you should be a member). The training course manual and included cd-rom is \$150 plus HST per student.

If you are one of those few shops that do not qualify for Registry inclusion, then we can complete an application for you for a simplified Certificate of Approval. We charge \$500 plus HST for members and \$750 plus HST for non-members for most applications.

If you are one of those rare shops that still ***cannot*** qualify for the simplified Certificate of Approval- you need to talk to us. Shops seldom ever get to this level, and other requirements apply.

Is there a help line?

Yes. The Ministry offers a help line at 416-314-8001 and the association offers a help line at 1-866-309-4272.

What's next?

Call the office at 1-866-309-4272 or info@cia.com and we handle everything for you. Most shops in Ontario ask us to handle environmental approvals for them.

***If there are any differences between the information in this FAQ and the regulation.
Please take the regulation as correct.***