

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection**

N724028348

FACILITY: Cooper Standard Automotive Inc.		SRN / ID: N7240
LOCATION: 4700 Industrial Row, OSCODA		DISTRICT: Saginaw Bay
CITY: OSCODA		COUNTY: IOSCO
CONTACT: Howard Scholtz III, HSE		ACTIVITY DATE: 01/15/2015
STAFF: Sharon LeBlanc	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Scheduled site inspection		
RESOLVED COMPLAINTS:		

On Thursday, January 15, 2015, a scheduled site inspection was conducted at the Cooper Standard Automotive (CSA) North America Division Facility (SRN N7240) located in the AuSable Township Industrial Park, 4700 Industrial Row, Oscoda, Michigan. Site inspection activities were conducted with the intent of confirming the operational status of the permitted equipment and that monitoring/reporting activities were being conducted per the referenced permit and applicable exemptions. Mr. Howard Scholtz III, HSE for the facility provided a tour of the facility and answered questions regarding facility operations and compliance.

FACILITY DESCRIPTION

CSA is an international company specializing in automotive components. The subject site is part of the North America Division, and per the company website is reported to produce tubes and hoses, fuel and brake assemblies as well as single lines and bundles. A review of District Files indicates that ownership of the subject site changed to CSA on February 7, 2006. Prior to that date the subject site was operated under/known as ITT Automotive, ITT Industries, ITT Industries Fluid Handling Systems and ITT Higbie Baylock (ITT).

The subject site is located in the AuSable Township Industrial Park, west of US 23. Located within the boundaries of the Huron National Forest, the facility, is bounded on the immediate north and south by a mix of industrial/commercial and undeveloped forest lands, and to the east and further to the north by small residential properties.

Historical - Records indicate that up to four ITT facilities were operated in the Tawas, East Tawas and Oscoda, Michigan areas. Initial PTI applications for ITT facilities were submitted in 1991, however it is unclear as to whether the applications were for proposed or existing processes. The four locations of record include;

- N7240 located at 4700 Industrial Row, Oscoda (subject site)
- N7055 located at 645 Aulerich Road, East Tawas
- N5071 located at 620 9th Ave, Tawas City and
- N0571 located at 4676 N. Industrial Row, Oscoda

Of the referenced facilities, the CSA website indicates that there are only two active facilities within the Saginaw Bay District, which includes the subject site (N7240) and the present East Tawas facility (SRN N7055). During the October 16, 2009, site inspection it was confirmed that N0571 and N7240 (subject site) were the same physical location. SRN N0571 had been identified by the previous owner as a separate plant based on production related activities rather than physical location. AQD databases have since been updated to reflect a single SRN for the geographic location by merging N0571 permits with N7240 data.

Property associated with the N5071 facility was sold by CSA in Spring 2008, and is presently owned and operated by AuSable Industries. A review of files indicates that all permits associated with N5071 and N0571 were voided in 2000-2003 and in 2006, respectively.

Operations - The facility consists of one building, which appears to have been added to in multiple phases. Activities onsite consist primarily of line extrusion, tube bending, as well as assembly of fuel and brake line bundles. Extrusion (aka extrusion molding) activities are conducted in the northern end of the facility. This automated process uses resin/plastic chips, which are manually fed into a bulk hopper for production of single or multi-layered lines to meet contract specifications. The process is mostly enclosed, with no vapors or odors noted during the site inspection. Extruded tubing is trimmed mechanically, and the trimmed ends are collected and recycled for use. Extruded lines are labeled with CSA product information.

Tube bending and forming activities (for both onsite extruded plastic tubing and purchased metal tubing) are performed onsite. The bent and formed lines are used in fuel and brake line bundles put together in segregated "cells" based on make and model of vehicle the bundles are for.

Extrusion dies and equipment are cleaned using a fluidized bed oven (permitted oven) to burn off plastics/resins remaining on the tooling/dies after excess materials has been physically removed. Metal components are placed in a basket and placed into a heated, fluidized bed using a lifting system. The plastic/organic materials are transformed from a solid to a gaseous form during contact with the heated sands, the gases rise from the bed, and are burned off in the afterburner, with residual particulates captured by a ceramic filter.

The facility also operates an ultrasonic cleaner that uses an aqueous solution to remove oil and grease from the cvt blocks.

Permits - One Permit to Install (PTI) 264-02 is associated with N7240, and was approved on February 6, 2004. The referenced permit is for a fluidized bed burn-off oven for plastics removal.

A number of voided permits are of record for the site. Voided PTIs 23-92 and 24-92 were issued for extrusion, pelletizing and inking machines associated with extrusion molding and surface coating processes. Correspondence in the district files requested the voiding of the referenced permits based on R336.1287. However, upon review it would appear that these processes would be exempt from permitting based on R336.1286(a) which exempts plastic extrusion, rotocasting and pultrusion equipment and associated plastic resin handling, storage and drying equipment, as well as R336.1287 (surface coatings) for the limited inking activities onsite.

Voided PTIs 1284-91, 1286-91 and 1287-91 (all voided May 27, 1994) were for ovens used in plastic tube forming processes. Correspondence in the district files indicates that the request for void was based on exemption under R 336.1287, but R 336.1286(d) may be more appropriate as the ovens are plastic thermoforming equipment.

In addition to the previously referenced permits, two permits (1288-91 and 1285-91) for adhesive application processes were previously associated with N0571 (now merged with N7240). The referenced application processes were voided due to low emissions under R336.1290 in December 2002. During the 2009 site visit, it was reported that the application process was no longer conducted onsite.

COMPLIANCE EVALUATION

Operational Status - During the facility tour the facility was in production with most phases of process activities ongoing. However, the permitted parts cleaner was not operating at the time of the site inspection.

No visual emissions or accumulated particulate matter were noted at the work stations. In addition, only a faint odor of warmed plastic was noted during the site inspection.

Material Usage Rates - This facility is predominantly a fabrication facility with production based on orders. No material usage restrictions are associated with the present active PTI for the site.

The facility has a number of heaters for office and work spaces; in addition, they reported having a number of tube heaters, as well as 2 small griever batch ovens and a conveyor oven that is used for tube

bending processes. Fuel type for furnaces and heating equipment associated with the site is predominantly natural gas, but a limited number of electric units are also present onsite. Output for the units is reported to range from 10K BTUs (lab ovens) to 400K BTUs (one of the grievance batch ovens).

Raw materials reported for the line extrusion process contains a number of various types of plastics/resins in a variety of material formulas.

No coatings are reported to be used in the extrusion molding, tube bending or bundling processes. "Blue Merpel Mix" which is composed of 99% water is used to lubricate components such as connectors and tubing during the bundle assembly process.

Inks were reported to be used on extruded lines to label lines with manufacturer information, but were reported to be a very low volume use.

Emission Points/Limits - Emission points identified included general maintenance equipment, extrusion equipment, tube bending ovens, ultrasonic cleaner, smog hog and the fluidized bed cleaning oven (EUCleanFurnace). With the exception of the tube bending ovens, smog hog and fluidized bed cleaning oven, emission points vent into the general work environment. Drives associated with the facility were paved and clean. No visible emissions were noted from equipment operating or stacks associated with the facility.

Special Condition 1.2 (SC1.2) limits visible emissions from EUCleanFurnace to not exceed 5% opacity on a six-minute average basis. The furnace was not operating at the time of the site visit and compliance under the reference condition could not be verified during the site visit. Operation logs for the equipment indicated that staff monitors VE associated with the equipment from the stack.

CSA staff reported that the stack associated with EUCleanFurnace was constructed per the permit, and discharged above the minimum height above ground of 37 ft. (SC1.23)

Operational Parameters - Operational parameters for the facility are limited to operating conditions associated with the Seghers fluid clean, fluidized bed Type D.866 cleaning furnace. CSA staff reported that the unit was installed per the permit, with the associated emission control systems (afterburner zone, ceramic element filter system and lime injection systems) (SC 1.3 - SC1.5). The unit was equipped at the time of installation with an automatic temperature control system for the furnace (SC1.9) and a datalogger to monitor the temperature in the afterburner once every minute. (SC1.15) The associated afterburner temperature sensor was reported to be installed at the exit of the afterburner zone. (SC1.15) CSA staff also reported that the unit was equipped with an interlock system to shut down the furnace when the automatic temperature control for the furnace is not operating. (SC1.16)

Total annual operating time for EUCleanFurnace 2004 through 2014 ranged from 767.3 to 572.5 hours, which is well below the 1200 hours per 12 month rolling time period limit specified in the permit (SC1.14).

SC1.7 and SC1.12 requires that the approved lime feed setting, corresponding minimum lime feed rate and minimum afterburner temperature are maintained during operation. In addition SC 1.12 requires a minimum retention time of 0.5 seconds be maintained in the afterburner zone. Facility staff report that the unit was programmed at the time of installation per permit requirements, and that no changes have been made regarding system operation. Lime feed rates reported for the previous year were noted to be ranging from 3.0 -3.6 rpm (3.5 rpm was the lime feed rate proposed by permittee in April 2004).

SC1.8 requires that the lime injection system is inspected at least once per batch to determine whether lime in the feed device hopper is free flowing or if there is blockage in the lime hopper. A review of the extrusion die cleaner tracking form maintained at the facility indicates that the lime injection flow is verified during every batch.

SC1.10 requires that the sand bed associated with EUCleanFurnace be preheated to 850 °F before loading parts into the sand bed for processing. A review of the extrusion die cleaner tracking form indicates that operators record the temperature at the start of cleaning cycle and identified a minimum

temperature consistent with the PTI. No temperatures below the minimum temp of 850 °F were reported during the period for the past year.

The permit restricts loading of any materials other than cured plastic residues on metal parts into EUCleanFurnace. (SC1.13) CSA has developed an operator training program with regards to the tool cleaning/purging procedures. The purpose of which is to ensure that proper cleaning of plastic/resin materials is conducted before tooling/dies are treated in EUCleanFurnace. Per the PTI the referenced plan outlines special cleaning procedures for halogenated materials.

Equipment Maintenance – CSA staff provided copies of the preventative maintenance plans that exist for the EUCleanFurnace. The plan includes calibration of the thermocouples associated with the sand bed and afterburner on an annual basis. SC1.17 requires yearly calibration of the referenced equipment. Annual calibration checks were confirmed as part of the 2009 site inspections, and facility staff confirmed that they had maintained the annual schedule. More recently, the facility had the emission unit serviced in October 2013, and due to the level of servicing indicated that the annual calibration check was not required.

Monitoring and Testing – SC1.6 and SC1.11 required that within 60 days of permit approval, that the permittee shall evaluate the lime feed system and afterburner zone temperature (2 weeks period) and submit a report to the AQD District Supervisor, summarizing the measurement data and proposing a minimum lime feed setting and corresponding minimum lime feed rate that will be maintained thereafter. The required evaluation and report was submitted to the AQD Permit Section on April 5, 2004.

As noted previously, SC1.2 limits visible emissions from EUCleanFurnace to a not to exceed 5% opacity on a six-minute average basis. The furnace did not appear to be operating at the time of the site visit and compliance under the reference condition could not be verified during the site visit. Operation logs for the equipment indicated that staff monitors and records VE associated with the equipment from the stack. A cursory review of the written logs did not identify any reported VEs.

Record Keeping and Reporting –

In order to meet compliance under PTI 264-02, the permittee is required to keep the following records in a satisfactory manner for a period of at least five years:

- Temperature data records for the EUCleanFurnace afterburner zone. (SC1.18)
- Lime feed settings for each batch of material processed in EUCleanFurnace. (SC1.22)
- Annual hours of operation for EUCleanFurnace on a monthly basis. (SC1.21)
- Current listing from the manufacturer of the chemical composition of each material being removed from the parts processed in EUCleanFurnace. (SC1.20) and
- Records of the date, duration and description of any malfunctions of the cleaning furnace, any maintenance performed and any testing results for EUCleanFurnace. (SC1.19)

With respect to the above referenced record keeping, the permit for EUCleanFurnace the furnace is equipped with a data logging system, which is downloaded by the facility and stored. Recordkeeping was presented at the time of the inspection, and appears to be in general compliance with the permit requirements.

Based on the information collected during the January 15, 2015, site visit, and subsequent information provided by CSA, it appears that the facility is being operated in compliance with its PTI. A review of potential federal regulations indicated that the facility was not subject to any federal standards due to size, process or materials reported. sgl

NAME Maion H. Blane

DATE 2/6/15

SUPERVISOR C. Hall

LeBlanc, Sharon (DEQ)

From: Scholtz, Howard <HScholtz@cooperstandard.com>
Sent: Tuesday, January 27, 2015 2:27 PM
To: LeBlanc, Sharon (DEQ)
Subject: RE: Oscoda report
Attachments: Permit 264-02 Dinamec Die Cleaner Hours of Operation.xlsx; 2013 2014 Seghers Fluid Clean Annual PM Records.pdf

Sharon,

Thank you for giving me the opportunity to review the Oscoda Plant Draft Report. It is very accurate also,

With regards to the Seghers Fluidized Bed Cleaner...

We do internal preventative maintenance on the unit annually and monthly based on the recommendations made by the manufacturer. Attached are records for the annual pm for 2013 and 2014 which include the thermocouple calibration data. In 2013 we had Seghers in to do an extensive additional inspection and therefore we had the additional report for your review.

The Hours of Operation spreadsheet is attached per your request.

With regards to reinforced plastic products...

I did a search for styrene in our Safetec MSDS's database. It only appeared in 2 of our items: Citgo Gasoline, Valve Regulated/Lead Acid Batteries. None of our production materials returned styrene as a constituent.

After our tubes are extruded, some of the tubes receive an ink jet print. The inks that we are using are Gem Gravure White Inkjet Ink WTG1660-LE, Gem Gravure Yellow Inkjet Ink YLG3364-LE. The Gem products are MEK based. Our Vanguard purchasing records indicate that we used 47.55 gallons of these inks in 2014. We also use 3-4 drums of MEK annually. That is primarily the extent of our production solvent usage annually.

Thank you,


Sr. Health, Safety & Environmental Professional

 

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From: LeBlanc, Sharon (DEQ) [<mailto:LeBlancS@michigan.gov>]
Sent: Monday, January 26, 2015 9:56 AM
To: Scholtz, Howard
Subject: Oscoda report

Howard,

Attached is the draft inspection report for the Oscoda facility. I do need to clarify two things with you. First is the Oct 2013 on the fluidized bed burn off oven, did I write down the correct date? Did the manufacturer rep say to skip the annual and worry about it for year 2? From the date I wrote down (2013) there would have been another in 2014...Or

did I misunderstand and you did the maintenance in 2013 and then an annual calibration check in 2014...but there was no calibration check in 2013 because of the extent of the work that was being conducted....

I should have asked to see the spreadsheet for the 12-month ROLLING total of hours of operation for the fluidized bed burn off oven. If you can send it to me, with the formulas intact so I can double check that would be great. It should show at least the last 5 years.

I think that if there are any federal regs that might be applicable, they are going to be the same ones that I already sent the overviews for.

Let me know if there are any comments on the reports? I will of course tweak this one based on your response to my two questions.

Thanks

Sharon G. LeBlanc
AQD, Saginaw Bay District Office
989-894-6212

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LeBlanc, Sharon (DEQ)

From: Scholtz, Howard <HScholtz@cooperstandard.com>
Sent: Monday, January 26, 2015 2:07 PM
To: LeBlanc, Sharon (DEQ)
Subject: RE: federal regs
Attachments: Petroferm Axarel 6100.pdf; Rohm Haas Thixon 803-1-F.pdf

Good Morning Sharon,

Thank you for providing the Draft Report for our East Tawas location. I have read it and it is very accurate.

With regards to our surface coating operation, here is some additional information that may be helpful.

Emission Unit Name	Plant Source I.D.	Contaminants
Axarel & Thixon Dip Process-Boiler, Oven and Ventilation	Coating Area	Trace amounts of VM & P Naphtha, Heptane N, Carbon Black, Chlorinated Paraffin Wax, Vinyltris from Thixon; Hydrocarbons, Dimethyl Glutarate from Axarel 6100 ; Carbon Dioxide from NG boiler

The coating used is 95% Axarel 6100 and 5% Thixon 803-1-F (MSDS attached). The current barrel of the Axarel/Thixon mixture was prepared on March 20th 2008. The drum is approximately 1/2 full. During the period of 2008-2014 we used <30 gallons of the coating mixture. Per our Production Control Department we have not coated product in this area under a regular production schedule for numerous years. The process is virtually obsolete with the slight possibility that we may receive a small service parts order in the next few years.

With regards to reinforced plastic products...

I did a search for styrene in our Safetec MSDS's database. It only appeared in 3 of our items: Citgo Gasoline, Sealed Lead Acid Batteries and a non production repair compound called Marine Resin. None of our production materials returned styrene as a constituent.

Thanks,


Sr. Health, Safety & Environmental Professional



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From: LeBlanc, Sharon (DEQ) [<mailto:LeBlancS@michigan.gov>]

Sent: Friday, January 23, 2015 4:07 PM

To: Scholtz, Howard

Subject: federal regs

Howard,

I am looking at the federal regs to see if there are any applicable to your site. I see two possibilities, one is the surface coating of plastic pats and products NESHAP (subpart PPPP) and the other is reinforced Plastics Composites Production NESHAP (Subpart WWWW)... For the coatings, the question becomes are you using 100 gallons or more per years of coatings that contain HAPs. You are so small I would think not. But I don't know what the coatings/inks you use are. For the plastic production, I don't think your producing reinforced plastic products. But you can answer that better than I can.

I am attaching the draft report for Tawas City. I may tweak it again next week when I take a look at it with a clear mind. But this should give you an idea what it will contain.

Sharon G. LeBlanc
AQD, Saginaw Bay District Office
989-894-6212

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Am I subject to the rule?

You are subject to the rule if...

- You own or operate a reinforced or non-reinforced plastic composites production facility that is located at a major source of HAP emissions and that uses thermoset resins and/or gel coats that contain styrene.

You are exempted from the rule if...

- Your facility is an area source.
- Your facility only repairs reinforced plastic composites.
- Your facility is a research and development facility as defined in the Clean Air Act.
- Your reinforced plastic composites operations use less than 1.2 tpy combined of thermoset resins and gel coats that contain styrene.

If you manufacture fiberglass boats or boat parts...

- You are not subject to this rule if all the reinforced plastic composites you manufacture are used in your boats. You are subject to the Boat Manufacturing NESHAP (40 CFR 63 Subpart VVVV).
- If you meet the applicability criteria of this rule and the Boat Manufacturing NESHAP, operations associated with the manufacture of composites that are not used in fiberglass boats are subject to this rule.
- Facilities potentially subject to this rule and the Boat Manufacturing NESHAP may elect to have all operations covered by the Boat Manufacturing NESHAP if HAP emissions will not increase as a result.
- Facilities that make boat parts but are not subject to the Boat Manufacturing NESHAP are subject to this rule if they meet this rule's applicability requirements.

Am I a new or existing source?

You are a new source if...

- Construction commenced after August 2, 2001 AND no other reinforced plastics composites affected source existed at the site when construction commenced.

You are an existing source if...

- You do not meet the criteria for a new source.

What do I have to do?

- Comply with emission limits (see Table 1), HAP content limits, or emission reduction requirements as applicable. You may use emissions averaging.
- Comply with work practices (see Table 2).
- Keep records.
- Submit notifications and reports.
- Certain operations are excluded (e.g., non-gel coat surface coating, application of mold sealing agents).

What if I am an existing source?

- If your source has no centrifugal casting or continuous lamination/casting operations, you must comply with the emission limits in Table 1 below.
- If your source does have centrifugal casting and/or continuous lamination/casting operations but the combined emissions from these operations are less than 100 tpy, you must comply with the emission limits in Table 1 below.
- If your source emits 100 tpy or more from the combination of all centrifugal casting and/or continuous lamination/casting operations, you must reduce the emissions from these operations by at least 95% and you must meet the emission limits in Table 1 below for all other operations.
- Certain operations for which specific requirements are not listed, such as polymer casting and resin transfer molding, do not have emission limits but are still subject to MACT and must comply with all applicable requirements, such as notification requirements.

What if I am a new source?

- If your source emits less than 100 tpy from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing, you must comply with the emission limits in Table 1 below.
- If your source emits 100 tpy or more from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing, you must reduce the emissions from those operations by 95%.
- Open molding and pultrusion operations for certain large parts are exempt from the 95% reduction requirement but must comply with emission limits and additional work practice requirements.

Table 1. Emission Limits for Existing Sources and for New Sources Emitting Less Than 100 TPY

Type of Material and/or Application	Limits by Type of Operation (lb/ton)						
	Mechanical	Filament	Manual	Centrifugal Casting	Gelcoat	Continuous Lamination/Casting	Pultrusion
Corrosion-Resistant and/or High Strength	112	171	123	25	605	--	--
Non-Corrosion-Resistant and/or Non-High Strength	87	188	87	20	--	--	--
Tooling	254	--	157	--	437	--	--
Low-Flame/Low-Smoke Resin	497	270	238	--	854	--	--
Shrinkage Control	354	215	180	--	--	--	--
White/Off-white pigmented gel coat	--	--	--	--	267	--	--
All other pigmented gel coat	--	--	--	--	377	--	--
Clear gel coat	--	--	--	--	522	--	--
All resins	--	--	--	--	--	15.7 lb/ton OR 58.5% reduction	60% reduction

Table 2. Work Practice Standards (Existing and New Sources)

Operation	Requirement
Compression/injection molding	Uncover only one charge per mold cycle per machine. One charge means sufficient material to fill all molds for multiple-mold machines or to fill the hopper for hopper-fed machines.
Cleaners	Use non-HAP containing cleaners, except styrene can be used to clean closed systems and organic HAP cleaners can be used to clean cured resin from application equipment.
Containers	Keep closed when storing HAP-containing materials.
Mixing/BMC manufacturing	Use covers with no visible gaps except for up to 1 inch around mixing shafts and instrumentation. Close mixer vents that are not vented to a 95 percent (or more) efficient control device when mixing (except when adding materials or as needed for safety reasons).
SMC manufacturing	Enclose resin delivery system to the doctor box and use nylon-containing film to wrap SMC.
Pultrusion (large parts)	Reduce air velocity; limit ambient air across wet-out area; no point suction of ambient air (unless directed to a control device); cover vessels containing HAP-containing materials.

When do I have to comply?

If your facility is an existing major source...

- You must comply by April 21, 2006; OR
- You must meet an enforceable HAP emissions limit below the major source threshold prior to April 21, 2006.
- If your facility emits less than 100 tons per year (tpy) of organic HAP from the combination of all centrifugal casting and continuous lamination/casting operations prior to or on April 21, 2003, and then increases emissions to 100 tpy or more from these operations, you must comply with the 95% reduction requirement within 3 years after the semi-annual compliance report indicates that your facility meets or exceeds the 100 tpy threshold.

If your facility is an existing area source...

- And becomes a major source after April 21, 2003, you must comply within 3 years after your facility becomes a major source.

If your facility is a new source and...

- It is a major source at startup, you must comply upon startup.
- It becomes a major source, you must comply immediately upon becoming a major source.
- It is initially only subject to the Table 1 or Table 2 limits, and subsequently increases actual organic HAP emissions to a level where the 95% reduction requirement applies, you must comply with the 95% reduction requirement (or the 95% requirement limit alternatives) within 3 years after the semi-annual compliance report indicates that your facility meets or exceeds the 100 tpy threshold.
- You use add-on controls to initially comply, you must demonstrate compliance within 180 days after start-up.

If your facility is using averaging to comply...

- You must initiate collection of required data on the compliance date (April 21, 2006, for existing sources, start-up for new sources) and demonstrate compliance 1 year later (April 21, 2007, for existing sources, 1 year after start-up for new sources).

Is my facility a major source or an area source?

It is a major source of HAP if...

- Your facility emits or has a potential to emit (considering controls) 10 tons per year or more of any single HAP or 25 tons per year or more of any combination of HAP.

It is an area source of HAP if...

- It is not a major source.

If you have a reinforced plastic composites operation, you may be affected by EPA air emission standards that were promulgated on April 21, 2003 [68 FR 19402]. This rule establishes requirements for organic hazardous air pollutants (HAP).

For More Information

Copies of the rule and associated materials are located at EPA's Reinforced Plastic Composites Production web site:

<http://www.epa.gov/ttn/atw/rpc/rpcpg.html>

You can also contact your regional EPA air toxics office as shown below:

Address	States	Website/ Phone Number
Region 1 1 Congress Street Suite 1100 Boston, MA 02114-2023	CT, MA, ME, NH, RI, VT	www.epa.gov/region1 (888) 372-7341
Region 2 290 Broadway New York, NY 10007-1866	NJ, NY, PR	www.epa.gov/region2 (212) 637-3000
Region 3 1650 Arch Street Philadelphia, PA 19103-2029	DE, MD, PA, VA, WV, DC	www.epa.gov/region3 (800) 438-2474 (215) 814-3297
Region 4 Atlanta Federal Center 61 Forsyth Street, SW Atlanta, GA 30303-3104	FL, NC, SC, KY, TN, GA, AL, MS	www.epa.gov/region4 (800) 241-1754
Region 5 77 W. Jackson Blvd Chicago, IL 60604	IL, IN, MI, WI, MN, OH	www.epa.gov/region5 (800) 621-8431
Region 6 1445 Ross Avenue Suite 1200 Dallas, TX 75202	AR, LA, NM, OK, TX	www.epa.gov/region6 (800) 887-6063 * (214) 665-6444
Region 7 901 N. 5 th Street Kansas City, KS 66101	IA, KS, MO, NE	www.epa.gov/region7 (800) 223-0425
Region 8 999-18th St. Suite 300 Denver, CO 80202-2466	CO, MT, ND, SD, UT, WY	www.epa.gov/region8 (800) 227-8917 * (303) 312-6312
Region 9 75 Hawthorne St., San Francisco, CA 94105	CA, AZ, HI, NV	www.epa.gov/region9 (415) 947-8000
Region 10 1200 6 th Avenue Seattle, WA 98101	AK, ID, WA, OR	www.epa.gov/region10 (800) 424-4372 * (206) 553-1200

* For sources within the region, only.

United States
Environmental Protection
Agency
<http://www.epa.gov/ttn/atw/rpc/rpcpg.html>

March 2004

Office of Air Quality Planning & Standards (E143-02)



REINFORCED PLASTICS COMPOSITES PRODUCTION NESHAP 40 CFR 63 SUBPART WWWW

AN OVERVIEW OF THE FINAL RULE

Reinforced plastic composites production is . . .

Limited to operations in which reinforced and/or nonreinforced plastic composites or plastic molding compounds are manufactured using thermoset resins and/or gel coats that contain styrene. Cleaning, mixing, HAP-containing materials storage, and repair operations associated with the production of plastic composites are also included.

New EPA air emission standards for Plastic Parts and Products Surface Coating Operations were promulgated on April 19, 2004 [69 FR 20968]

Who is covered by the rule?

[§§63.4481 and 63.4482]

You are subject if you own or operate a new, reconstructed or existing affected source at a facility that is a major source, is located at a major source, or is part of a major source of hazardous air pollutants (HAP) and uses 100 gallons per year or more of coatings that contain HAP to coat plastic parts or products.

An Affected Source is . . .

The collection of all coating operations; storage containers and mixing vessels used for coatings, thinners and/or other additives, cleaning materials and wastes; and manual and automated conveying equipment and containers used for coatings, thinners and/or other additives, cleaning materials and wastes.

Plastic parts and products includes, but is not limited to . . .

Plastic components of the following types of products: motor vehicle parts and accessories for automobiles, trucks, RVs; sporting and recreational goods; toys; business machines; laboratory and medical equipment; and household and other consumer products.

Coatings are . . .

Materials applied to a substrate for decorative, protective, or functional purposes and include, but are not limited to, paints, sealants, caulks, inks, adhesives, and maskants.

Who is not covered by this rule?

[§63.4481]

The following sources are not covered under Subpart PPPP:

- ❖ Sources that only use coatings, thinners and other additives, and cleaning materials containing no organic HAP
- ❖ Research or laboratory facilities, janitorial or building and facility maintenance operations, hobby shops operated for noncommercial purposes
- ❖ Surface coating of plastic parts and products performed on-site at installations owned by the US Armed Forces or NASA
- ❖ Surface coating of military munitions manufactured by the US Armed Forces
- ❖ Extrusion of a plastic covering onto plastic parts or products to form a coating
- ❖ Surface coating of magnet wire

- ❖ In-mold coating operations or gel coating operations in the manufacture of reinforced plastic composite parts that meet the requirements of subpart WWWW.
- ❖ Surface coating of plastic components that meet the applicability criteria of any of the following surface coating NESHAP in Part 63, Subparts: JJ (wood furniture), NNNN (large appliances), RRRR (metal furniture), QQQQ (wood building products), GG (aerospace manufacturing and rework), II (shipbuilding and ship repair), JJJJ (paper and other web coating), and VVVV (boat manufacturing, except that post-mold coating operations for personal watercraft and parts of personal watercraft are subject to PPPP)
- ❖ Surface coating of plastic parts intended for use in an aerospace vehicle or component using specialty coatings as defined in appendix A of 40 CFR 63, subpart GG
- ❖ Surface coating of fiberglass boats or parts of fiberglass boats, not including
- ❖ Coating application using hand-held nonrefillable aerosol containers, touchup markers, or marking pens

What standards must I follow?

[§63.4490]

You must meet the emission limit for the subcategory or subcategories present in your facility. The subcategories are: general use coating, automotive lamp coating, thermoplastic olefin (TPO) coating, and assembled on-road vehicle coating.

Operating Limits

[§63.4492]

The operating limits are the site-specific parameter limits you determine for your capture and control devices during the performance test. Your operating limits must be monitored by a continuous parameter monitoring system (CPMS).

Compliance Dates

[§63.4483]

If your Initial startup is ...	Then you're *	And must comply by ...
On or before December 4, 2002	An existing source	April 19, 2007
After December 4, 2002	A new source	By April 19, 2004 or the initial startup of your affected source, whichever is later

* When determining whether a source is new or existing, the General Provisions (40 CFR 63, Subpart A) requires us to use the proposal date of the rule as the cutoff date. For subpart PPPP, the rule proposal date was December 4, 2002.

Noncompliance with applicable regulations after the compliance date may result in fines and penalties of up to \$25,000 per day per violation.

Compliance Calculations

[§§63.4541 – 63.4566]

For Compliance Option No. 1, the collected data for coatings, thinners, and cleaning materials are used to calculate the organic HAP content of each material used during each 12-month compliance period. For Compliance Options No. 2 and 3, an organic HAP emission rate for the 12-month compliance period is calculated.

Notification, Recordkeeping, and Reporting Requirements

Initial Notification: [§63.4510]

The initial notification states that your facility is subject to the plastic parts and products surface coating standards. You must submit this no later than April 19, 2005, if you are an existing source. If you are a new source, you must submit this by April 19, 2004, or initial startup, whichever is later.

Notification of Intent to Conduct a Performance Test: [§63.9(e)]

If your facility is required to conduct performance tests (e.g., those with add-on control equipment), you must submit a notification of intent to conduct a performance test 60 days prior to the test.

Notification of Compliance Status: [§63.4510]

You must submit a Notification of Compliance Status (NOCS) within 30 days after initial compliance period. The initial compliance period ends on the last day of the 12th full month following the compliance date.

Performance Test Report: [§63.4520]

If your facility is required to conduct performance tests (e.g., those with add-on control equipment), you must submit a performance test report within 60 days after completion of the performance test.

Startup, Shutdown, Malfunction Reports: [§63.4520]

A startup, shutdown, and malfunction report must be submitted immediately if there was a startup, shutdown, or malfunction of the control device during the reporting period that is not consistent with the startup, shutdown, and malfunction plan. If actions taken were consistent with the startup, shutdown, and malfunction plan, the report must be submitted semiannually.

Semiannual Compliance Reports: [§63.4520]

After the initial compliance period each affected source must submit semiannual compliance reports.

Records: [§§63.4530 and 63.4531]

Your facility is required to keep records of reported information and all other information necessary to document compliance with the proposed rule for 5 years. There may be additional requirements depending on the compliance option that you choose.

Compliance Options

[§63.4490]

Table 1. HAP Emission Limits for Coating Types

Subcategory	Emission Limit (kg HAP/kg of coating solids)	
	New/Reconstructed Sources	Existing Sources
General Use Coating	0.16	0.16
Automotive Lamp Coating	0.26	0.45
Thermoplastic Olefin (TPO) Coating	0.22	0.26
New Assembled On-Road Vehicle Coating	1.34	1.34

You may: (1) comply with emission limits separately; (2) if general use or TPO is your predominant activity (>90%) you may comply with one of those emission limits for all of your coatings operations; or (3) determine a facility-specific emission limit [' 63.4490(c)]

You may comply with your emission limits by doing any of the following [' 63.4491]:

- Compliant Material Option** – Each coating you use must not exceed the HAP limit in Table 1, determined during the 12-month compliance period. Each thinner or other additive and cleaning material used must contain no organic HAP.
- Emission Rate Without Add-on Controls** – The organic HAP emission rate, calculated as a rolling 12-month emission rate and determined on a monthly basis. For coatings, thinners, and cleaning materials must not exceed the HAP limits in Table 1.
- Emission Rate With Add-On Controls** – The organic HAP emission rate, calculated as a rolling 12-month emission rate and determined on a monthly basis, for coatings, thinners, and cleaning materials (including emission capture and control efficiency) the HAP limits in Table 1.

If you are subject to any other final surface coating NESHAP, you have the option of complying with each NESHAP separately, complying with the emission limit that represents the predominant surface coating activity at your facility (not including assembled on-road vehicle and automotive lamp coating operations), or you may develop a facility-specific emission limit [' 63.4481(e)].

Work Practice Standards

[63.4493]

If you use capture and control devices, you must develop and operate according to a work practice plan. The plan should include actions to:

- ❖ Cover mixing and storage vessels containing organic HAP-containing coatings, thinners, cleaning materials, and waste materials except when adding, removing, or mixing contents
- ❖ Use closed containers or pipes to store and convey organic HAP-containing coatings, thinners, cleaning materials, and waste materials
- ❖ Minimize spills of organic HAP-containing coatings, thinners, cleaning materials, and waste materials
- ❖ Minimize organic HAP emissions during cleaning of storage, mixing, and conveying equipment

You can also contact your regional EPA air toxics office at the following numbers:

Address	States	Website/ Phone Number
Region 1 1 Congress Street Suite 1100 Boston, MA 02114-2023	CT, MA, ME, NH, RI, VT	www.epa.gov/region1 (888) 372-7341
Region 2 290 Broadway New York, NY 10007-1866	NJ, NY, PR	www.epa.gov/region2 (212) 637-3000
Region 3 1650 Arch Street Philadelphia, PA 19103-2029	DE, MD, PA, VA, WV, DC	www.epa.gov/region3 (800) 438-2474 (215) 814-3297
Region 4 Atlanta Federal Center 61 Forsyth Street, SW Atlanta, GA 30303-3104	FL, NC, SC, KY, TN, GA, AL, MS	www.epa.gov/region4 (800) 241-1754
Region 5 77 W. Jackson Blvd Chicago, IL 60604	IL, IN, MI, WI, MN, OH	www.epa.gov/region5 (800) 621-8431
Region 6 1445 Ross Avenue Suite 1200 Dallas, TX 75202	AR, LA, NM, OK, TX	www.epa.gov/region6 (800) 887-6063* (214) 665-6444
Region 7 901 N. 5 th Street Kansas City, KS 66101	IA, KS, MO, NE	www.epa.gov/region7 (800) 223-0425
Region 8 999 18th St. Suite 300 Denver, CO 80202-2466	CO, MT, ND, SD, UT, WY	www.epa.gov/region8 (800) 227-8917* (303) 312-6312
Region 9 75 Hawthorne St., San Francisco, CA 94105	CA, AZ, HI, NV	www.epa.gov/region9 (415) 947-8000
Region 10 1200 6 th Avenue Seattle, WA 98101	AK, ID, WA, OR	www.epa.gov/region10 (800) 424-4372* (206) 553-1200

* For sources within the region, only.

For More Information

Copies of the rule and other material are located at EPA's Plastic Parts and Products Surface Coating web site:
www.epa.gov/ttn/atw/plastic/plasticpg.html

United States
Environmental Protection
Agency

September 2004
Updated 5/31/05

www.epa.gov/ttn/atw/plastic/plasticpg.html

Office of Air Quality Planning & Standards (E143-02)



SURFACE COATING OF PLASTIC PARTS AND PRODUCTS NESHAP (SUBPART PPPP)

AN OVERVIEW OF THE FINAL RULE

[picture pending]

ELECTRONIC CODE OF FEDERAL REGULATIONS**e-CFR Data is current as of January 26, 2015**

Title 40 → Chapter I → Subchapter C → Part 63 → Subpart PPPP

Title 40: Protection of Environment

PART 63—NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES (CONTINUED)

Subpart PPPP—National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products

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SOURCE: 69 FR 20990, Apr. 19, 2004, unless otherwise noted.

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WHAT THIS SUBPART COVERS

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§63.4480 What is the purpose of this subpart?

This subpart establishes national emission standards for hazardous air pollutants (NESHAP) for plastic parts and products surface coating facilities. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations.

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§63.4481 Am I subject to this subpart?

(a) Plastic parts and products include, but are not limited to, plastic components of the following types of products as well as the products themselves: Motor vehicle parts and accessories for automobiles, trucks, recreational vehicles; sporting and recreational goods; toys; business machines; laboratory and medical equipment; and household and other consumer products. Except as provided in paragraph (c) of this section, the source category to which this subpart applies is the surface coating of any plastic parts or products, as described in paragraph (a)(1) of this section, and it includes the subcategories listed in paragraphs (a)(2) through (5) of this section.

(1) Surface coating is the application of coating to a substrate using, for example, spray guns or dip tanks. When application of coating to a substrate occurs, then surface coating also includes associated activities, such as surface preparation, cleaning, mixing, and storage. However, these

activities do not comprise surface coating if they are not directly related to the application of the coating. Coating application with handheld, non-refillable aerosol containers, touch-up markers, marking pens, or the application of paper film or plastic film which may be pre-coated with an adhesive by the manufacturer are not coating operations for the purposes of this subpart.

(2) The general use coating subcategory includes all surface coating operations that are not automotive lamp coating operations, thermoplastic olefin (TPO) coating operations, or assembled on-road vehicle coating operations.

(3) The automotive lamp coating subcategory includes the surface coating of plastic components of the body of an exterior automotive lamp including, but not limited to, headlamps, tail lamps, turn signals, and marker (clearance) lamps; typical coatings used are reflective argent coatings and clear topcoats. This subcategory does not include the coating of interior automotive lamps, such as dome lamps and instrument panel lamps.

(4) The TPO coating subcategory includes the surface coating of TPO substrates; typical coatings used are adhesion promoters, color coatings, clear coatings and topcoats. The coating of TPO substrates on fully assembled on-road vehicles is not included in the TPO coating subcategory.

(5) The assembled on-road vehicle coating subcategory includes surface coating of fully assembled motor vehicles and trailers intended for on-road use, including, but not limited to: automobiles, light-duty trucks, heavy duty trucks, and busses that have been repaired after a collision or otherwise repainted; fleet delivery trucks; and motor homes and other recreational vehicles (including camping trailers and fifth wheels). This subcategory also includes the incidental coating of parts, such as radiator grilles, that are removed from the fully assembled on-road vehicle to facilitate concurrent coating of all parts associated with the vehicle. The assembled on-road vehicle coating subcategory does not include the surface coating of plastic parts prior to their attachment to an on-road vehicle on an original equipment manufacturer's (OEM) assembly line. The assembled on-road vehicle coating subcategory also does not include the use of adhesives, sealants, and caulks used in assembling on-road vehicles. Body fillers used to correct small surface defects and rubbing compounds used to remove surface scratches are not considered coatings subject to this subpart.

Not major source of HAP

(b) You are subject to this subpart if you own or operate a new, reconstructed, or existing affected source, as defined in §63.4482, that uses 378 liters (100 gallons (gal)) per year, or more, of coatings that contain hazardous air pollutants (HAP) in the surface coating of plastic parts and products defined in paragraph (a) of this section; and that is a major source, is located at a major source, or is part of a major source of emissions of HAP. A major source of HAP emissions is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (Mg) (10 tons) or more per year or any combination of HAP at a rate of 22.68 Mg (25 tons) or more per year. You do not need to include coatings that meet the definition of non-HAP coating contained in §63.4581 in determining whether you use 378 liters (100 gallons) per year, or more, of coatings in the surface coating of plastic parts and products.

(c) This subpart does not apply to surface coating or a coating operation that meets any of the criteria of paragraphs (c)(1) through (17) of this section.

(1) A coating operation conducted at a facility where the facility uses only coatings, thinners and other additives, and cleaning materials that contain no organic HAP, as determined according to §63.3941(a).

(2) Surface coating operations that occur at research or laboratory facilities, or is part of janitorial, building, and facility maintenance operations, or that occur at hobby shops that are operated for noncommercial purposes.

(3) The surface coating of plastic parts and products performed on-site at installations owned or operated by the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State) or the National Aeronautics and Space Administration, or the surface coating of

military munitions manufactured by or for the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State).

- (4) Surface coating where plastic is extruded onto plastic parts or products to form a coating.
- (5) Surface coating of magnet wire.
- (6) In-mold coating operations or gel coating operations in the manufacture of reinforced plastic composite parts that meet the applicability criteria for reinforced plastics composites production (subpart VVVVV of this part).
- (7) Surface coating of plastic components of wood furniture that meet the applicability criteria for wood furniture manufacturing (subpart JJ of this part).
- (8) Surface coating of plastic components of large appliances that meet the applicability criteria for large appliance surface coating (subpart NNNN of this part).
- (9) Surface coating of plastic components of metal furniture that meet the applicability criteria for metal furniture surface coating (subpart RRRR of this part).
- (10) Surface coating of plastic components of wood building products that meet the applicability criteria for wood building products surface coating (subpart QQQQ of this part).
- (11) Surface coating of plastic components of aerospace vehicles that meet the applicability criteria for aerospace manufacturing and rework (40 CFR part 63, subpart GG).
- (12) Surface coating of plastic parts intended for use in an aerospace vehicle or component using specialty coatings as defined in appendix A to subpart GG of this part.
- (13) Surface coating of plastic components of ships that meet the applicability criteria for shipbuilding and ship repair (subpart II of this part).
- (14) Surface coating of plastic using a web coating process that meets the applicability criteria for paper and other web coating (subpart JJJJ of this part).
- (15) Surface coating of fiberglass boats or parts of fiberglass boats (including, but not limited to, the use of assembly adhesives) where the facility meets the applicability criteria for boat manufacturing (subpart VVVV of this part), except where the surface coating of the boat is a post-mold coating operation performed on personal watercraft or parts of personal watercraft. This subpart does apply to post-mold coating operations performed on personal watercraft and parts of personal watercraft.
- (16) Surface coating of plastic components of automobiles and light-duty trucks that meet the applicability criteria in §63.3082(b) of the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR part 63, subpart IIII) at a facility that meets the applicability criteria in §63.3081(b).
- (17) Screen printing.

(d) If your facility meets the applicability criteria in §63.3081(b) of the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR part 63, subpart IIII) and you perform surface coating of plastic parts or products that meets both the applicability criteria in §63.3082(c) and the applicability criteria of this subpart, then for the surface coating of any or all of your plastic parts or products that meets the applicability criteria in §63.3082(c), you may choose to comply with the requirements of subpart IIII of this part in lieu of complying with this subpart. Surface coating operations on plastic parts or products (e.g., parts for motorcycles or lawnmowers) not intended for use in automobiles, light-duty trucks, or other motor vehicles as defined in §63.3176 cannot be made part of your affected source under subpart IIII of this part.

(e) If you own or operate an affected source that meets the applicability criteria of this subpart and at the same facility you also perform surface coating that meets the applicability criteria of any other

final surface coating NESHAP in this part, you may choose to comply as specified in paragraph (e)(1), (2), or (3) of this section.

(1) You may have each surface coating operation that meets the applicability criteria of a separate NESHAP comply with that NESHAP separately.

(2) You may comply with the emission limitation representing the predominant surface coating activity at your facility, as determined according to paragraphs (e)(2)(i) and (ii) of this section. However, you may not establish assembled on-road vehicle or automotive lamp coating operations as the predominant activity. You must not consider any surface coating activity that is subject to the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR part 63, subpart IIII) in determining the predominant surface coating activity at your facility.

(i) If a surface coating operation accounts for 90 percent or more of the surface coating activity at your facility (that is, the predominant activity), then compliance with the emission limitations of the predominant activity for all surface coating operations constitutes compliance with these and other applicable surface coating NESHAP. In determining predominant activity, you must include coating activities that meet the applicability criteria of other surface coating NESHAP and constitute more than 1 percent of total coating activities at your facility. Coating activities that meet the applicability criteria of other surface coating NESHAP but comprise less than 1 percent of coating activities need not be included in the determination of predominant activity but must be included in the compliance calculation.

(ii) You must use kilogram (kg) (pound (lb)) of solids used as a measure of relative surface coating activity over a representative period of operation. You may estimate the relative mass of coating solids used from parameters other than coating consumption and mass solids content (*e.g.*, design specifications for the parts or products coated and the number of items produced). The determination of predominant activity must accurately reflect current and projected coating operations and must be verifiable through appropriate documentation. The use of parameters other than coating consumption and mass solids content must be approved by the Administrator. You may use data for any reasonable time period of at least 1 year in determining the relative amount of coating activity, as long as they represent the way the source will continue to operate in the future and are approved by the Administrator. You must determine the predominant activity at your facility and submit the results of that determination with the initial notification required by §63.4510(b). You must also determine predominant activity annually and include the determination in the next semi-annual compliance report required by §63.4520(a).

(3) You may comply with a facility-specific emission limit calculated from the relative amount of coating activity that is subject to each emission limit. If you elect to comply using the facility-specific emission limit alternative, then compliance with the facility-specific emission limit and the emission limitations in this subpart for all surface coating operations constitutes compliance with this subpart and other applicable surface coating NESHAP. The procedures for calculating the facility-specific emission limit are specified in §63.4490. In calculating a facility-specific emission limit, you must include coating activities that meet the applicability criteria of other surface coating NESHAP and constitute more than 1 percent of total coating activities at your facility. You must not consider any surface coating activity that is subject to the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR part 63, subpart IIII) in determining a facility-specific emission limit for your facility. Coating activities that meet the applicability criteria of other surface coating NESHAP but comprise less than 1 percent of total coating activities need not be included in the calculation of the facility-specific emission limit but must be included in the compliance calculations.

[69 FR 20990, Apr. 19, 2004, as amended at 69 FR 22660, Apr. 26, 2004; 71 FR 76927, Dec. 22, 2006; 72 FR 20237, Apr. 24, 2007]

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§63.4482 What parts of my plant does this subpart cover?