

Compliance Requirements

[§§63.3150, 63.3160 and 63.3170]

Table 1. HAP Emission Limits [§63.3090]

Type	Coating Operation	Emission Limit	
		Existing	New
1	Combined EDP, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operation plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating systems added to the affected source under ' 63.3082(c).	0.072 kg organic HAP/liter of coating solids deposited	0.036 kg organic HAP/liter of coating solids deposited
2	Combined primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive operation plus all coatings and thinners, except for deadener materials and for adhesive and sealer materials that are not components of glass bonding systems, used in coating systems added to the affected source under ' 63.3082(c) and EDP system must meet the operating limits of [' 63.3092(a) or (b)].	0.132 kg organic HAP/liter of coating solids deposited	0.060 kg organic HAP/liter of coating solids deposited
3	Adhesives and sealers, other than glass bonding adhesives	0.010 kg/kg of material used	0.010 kg/kg of material used
4	Deadener	0.010 kg/kg of material used	0.010 kg/kg of material used

You may comply with the emission limits for coating operations type 1 or 2, and you must comply with emission limits for coating operations types 3 and 4 (as listed above in Table 1) by doing the following:

- 1) The emission rate from this group of coating operations must meet the limits in Table 1. If you use control devices you must meet the operating limits. You must comply with work practice standards.
- 2) The emission rate from this group of coating operations must meet the limits in Table 1 and you must meet specific operating limits for EDP primer (considered separately). If you use control devices you must meet the operating limits. You must comply with work practice standards.
- 3) The organic HAP content for each individual adhesive or sealer or the mass average HAP content for all adhesives and sealers combined during the month must meet the limits in Table 1. You must comply with work practice standards.
- 4) The organic HAP content for each individual deadener or the mass average HAP content for all deadeners combined during the month must meet the limits in Table 1. You must comply with work practice standards.

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 Automobile and Light-Duty Truck web site:

<http://www.epa.gov/ttn/atw/auto/autopg.html>

United States
Environmental Protection
Agency

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



SURFACE COATING OF AUTOMOBILES AND LIGHT- DUTY TRUCKS NESHAP (SUBPART III)

AN OVERVIEW OF THE FINAL RULE



New EPA air emission standards for Surface Coating of Automobiles and Light-Duty Trucks were promulgated on April 26, 2004 [69 FR 22602]

Who is covered by the rule?
[§63.3081]

You are covered if you own or operate an new, reconstructed, or existing affected source that is located at a facility that applies topcoat to new automobile or new light-duty truck bodies or to body parts for new automobiles or new light-duty trucks and that is a major source, is located at a major source, or is part of a major source of hazardous air pollutants (HAP).

An Affected Source is . . .

The collection of all coating operations used for surface coating of new automobile or new light-duty truck bodies, or body parts for new automobiles or new light-duty trucks and equipment used to store and convey coatings, thinners, cleaning materials and waste materials for these coating operations.

Automobiles include, but are not limited to . . .

Motor vehicles designed to carry up to 8 passengers excluding light-duty trucks.

Light-duty trucks include, but are not limited to . . .

Vans, sport utility vehicles, and motor vehicles designed primarily to transport light loads of property with a gross vehicle weight less than or equal to 8,500 tons.

Who is not covered by this rule?
[§63.3081]

The following sources are not covered under Subpart IIII:

- ❖ Surface coating subject to any other NESHAP in Part 63 as June 25, 2004, except:
 - ⇒ A facility may choose to include in its affected source under subpart IIII, coating operations used to apply coatings to parts intended for use in new automobiles or new light-duty trucks or as aftermarket repair or replacement parts for automobile and light-duty trucks that may be subject to the miscellaneous metal parts and products NESHAP (subpart MMMM) or the plastic parts and products NESHAP (subpart PPPP).
- ❖ Research or laboratory facilities.
- ❖ Janitorial or building and facility maintenance operations, including spray booths used for painting production equipment, furniture, signage, etc., for use within the plant.
- ❖ Coating application using hand-held nonrefillable aerosol containers, touchup markers, marking pens, or pinstriping equipment.

What standards must I follow?
[§63.3090]

You must meet the emission limit for the coating operation or operations present in your facility. Coating operations include: electrodeposition primer (EDP), primer-surfacer, topcoat, final repair, glass bonding primer, glass bonding adhesives, deadeners, and adhesive and sealer materials that are not components of glass bonding systems. If your EDP operation meets certain operating limits then you may choose to include EDP with other coating operations or separate it from other coating operations

(See Type 1 and Type 2 in Table 1 of this brochure).

Operating Limits
[§63.3093]

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
[§63.3083]

If your initial startup is ...	Then you're *	And must comply by ...
On or before December 24, 2002	An existing source	April 26, 2007
After December 24, 2002	A new source	By the June 25, 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 IIII, the rule proposal date was December 24, 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
[§§63.3151 – 63.3171]

For compliance with adhesive, sealer and deadener requirements, the collected data is used to determine the organic HAP content for each individual material used during the compliance period or as an average for the group of materials used during the compliance period. For compliance with the requirements for the combined EDP, primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive emission limitations, an organic HAP emission rate, including transfer efficiency and emission reductions resulting from controls, is calculated for the 1-month compliance period. For compliance with the requirements for the combined primer-surfacer, topcoat, final repair, glass bonding primer, and glass bonding adhesive emission limitations, an organic HAP emission rate, including transfer efficiency and emission reductions resulting from controls, is calculated for the 1-month compliance period. In addition, you must demonstrate compliance with the EDP operating limits.

Notification, Recordkeeping, and Reporting Requirements

Initial Notification: [§63.3110(b)] The initial notification states that your facility is subject to the automobiles and light-duty truck surface coating standards. You must submit this no later than April 26, 2005 if you are an existing source. If you are a new source, you must submit this within 120 days after June 25, 2004 or 120 days after 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: [§63.3110(c)] 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 first full month following the compliance date.

Performance Test Report: [§63.3120(b)] 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: [§63.3120(c)] A startup, shutdown, and malfunction report must be submitted within 2 days with a follow-up letter within 7 days after the end of the event, 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 [§63.10(d)(5)(ii)]. If actions taken were consistent with the startup, shutdown, and malfunction plan, the report must be submitted semiannually.

Semiannual Compliance Reports: [§63.3120] After the initial compliance period each affected source must submit semiannual compliance reports. The first compliance report covers the period from June 1, 2007, to June 30, 2007, and should be submitted by July 31, 2007. Subsequent reports must be submitted semiannually on July 31 or January 31 thereafter.

Records: [§§63.3130 and 63.3131] 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.

Work Practice Standards
[§63.3094]

You must develop and operate according to a work practice plan to minimize organic HAP emissions from the storage, mixing and conveying of coatings, thinners, and cleaning materials used in and waste materials generated by all coating operations. You are not required to develop and operate work practices for these operations.

You must also develop work practice plan to minimize organic HAP emissions from cleaning and purging equipment associated with all coating operations. The plan must address emissions from each of the following operations:

- ⇒ Vehicle body wipe
- ⇒ Coating line purging
- ⇒ Coating system flushing
- ⇒ Spray booth grate cleaning
- ⇒ Spray booth wall cleaning
- ⇒ Spray booth equipment cleaning
- ⇒ External spray booth area cleaning
- ⇒ Housekeeping measures not otherwise addressed