Miscellaneous Surface Coating at Area Sources

40 CFR 63 Subpart HHHHHHH (6H)
40 CFR 63 Subpart XXXXXX (6X)

Rick Nelson
Mecklenburg County Air Quality
April 26, 2012
Area Source

- HAP emissions less than 10 tons per year (TPY) of any one, and less than 25 TPY of all HAP combined

Compounds of chromium, lead, nickel, manganese, cadmium

Methylene Chloride
Toluene

Xylenes
Ethylbenzene
Applicability

1. Paint stripping operations using methylene chloride (MeCl)
2. Spray application of coatings containing Cd, Cr, Pb, Mn, or Ni (target HAP)
3. Spray-applied surface coating operations:
   • Motor vehicles and mobile equipment
   • Any metal or plastic parts or products that are not motor vehicles or mobile equipment
4. Spray application of coatings in metal fabrication and finishing-nine source categories
Basic Compliance

- Paint stripping
  - Minimize MeCl emissions
  - Written plan for > 1 ton MeCl annual usage
- Spray-applied surface coating
  - Apply in filtered enclosure
  - HVLP guns or equivalent
  - Limit spray gun cleaning overspray
  - Painter training
- Notification, reporting and recordkeeping
Air Permitting

• Petition of Exemption for motor vehicle or mobile equipment refinishing
• Exempt from air permit if PTE for VOC is less than 5 tons/year based on 5 years of actual emissions data
  – Provisionally exempt if <5 years data until 5 years data is obtained with VOC PTE < 5 tons/year
• Air permit for sources with VOC PTE > 5 tons/year
For More Information

- http://www.epa.gov/ttn/atw/area/arearules.html
- http://charmeck.org/mecklenburg/county/AirQuality/PermittingRegulations/Pages/PaintStrippingandSurfacecoatingOperations(GACT6H).aspx
- Rick Nelson or Chuck Greco, MCAQ (704) 336-5430