



# **Paints and Allied Products Manufacturing:**

Area Source Standards

Final Rule

March 25, 2010



# Applicability

- Paint & Coating Manufacturing 325510
- Adhesive Manufacturing 325520
- Printing Ink Manufacturing 325910
- All Other Misc. Chemical Product and Preparation Manufacturing 325998
  - Indelible, India, writing, and stamp pad inks only

# Applicability

A decorative graphic consisting of two rows of circles. The top row has a solid purple circle on the left and an outlined purple circle on the right. The bottom row has a solid purple circle on the left, an outlined purple circle in the middle, and a solid purple circle on the right.

- Does not apply to:

- Manufacture of thinners, paint removers, brush cleaners and mold release agents
- Manufacture of electroplated and electroless metal films
- Manufacture of raw materials
  - Resins, pigments, solvents
- Activities by end users to ready materials for application

# Affected Source

- YES
- Paint and allied products manufacturing facilities that process, use or generate the listed HAP

- NO
- Facilities that no longer process, use or generate the listed HAP
- R&D facilities

# Listed HAP



- Volatile
  - Benzene
  - Methylene chloride
- Metal compounds
  - Cadmium
  - Chromium
  - Lead
  - Nickel

# Paints Rule Stats



- Almost 2200 facilities
- Baseline HAP emissions 4800 tpy
- Anticipated emission reductions
  - 169 tpy organic HAP
  - 4.2 tpy metal HAP (6,300 tpy PM)
- Capital cost is \$8.1 million and the annualized cost is \$3.1 million per year
- Rule promulgated November 16, 2009
  - Proposed May 22, 2009



# Volatile HAP Requirements

- Applies to all storage and process vessels, except mixing vessels
- Equip vessels with covers that maintain 90% contact with rim
- Exempts quality control testing and product sampling

# Metal HAP Requirements



- When adding of dry pigments and solids containing listed HAP to a process vessels or to the grinding and milling process you must:
  1. Operate a PM capture system
  2. Fully enclose the equipment
  3. Use pigments and solids in a solution or slurry
- Visible emissions from exhaust must not exceed 10% opacity if venting to atmosphere
  - Requirement doesn't apply if device doesn't vent to atmosphere



# Dates



- **Initial notice of applicability**

Existing sources: June 1, 2010

New sources: 180 days after startup or June 1, 2010, whichever is later

- **Compliance**

Existing sources: December 3, 2012

New sources: December 3, 2009

- **Notification of Compliance Status**

Existing sources: June 3, 2013

New sources: June 10, 2010 or 180 days after initial startup, whichever is later



# Upcoming Amendments

- Technical correction published 75 FR 10185 on March 5, 2010
  - Minor edits and renumbering
- Direct final in May



# Available Implementation Tools

- <http://www.epa.gov/ttn/atw/area/arearules.html#final>
  - Area Source Rule Home Page on TTN
- <http://www.epa.gov/ttn/atw/area/arearules.html#inot>
  - Initial Notification and Compliance form examples
- <http://www.epa.gov/Compliance/monitoring/programs/caa/adi.html>
  - Applicability Determination Index
- <http://edocket.access.gpo.gov/2009/pdf/E9-27947.pdf>
  - FR Notice for final rule