

NESHAP Paint Stripping & Misc Surface Coating at Area Sources

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Goals

- Streamline regulatory process by consolidating effort on 3 related source categories into single rule
 - Paint Stripping
 - Auto Refinishing (Coating)
 - Miscellaneous Plastic Parts (Coating)
- Anticipate reduction of
 - Rule development notice effort and resources
 - State implementation burden
 - Compliance burden
 - Minimize small entity impacts
- Provide single rule for sources that
 - Are co-located
 - Utilize similar processes

Paint Stripping Category

- Strippers that use MeCl in paint removal from wood, metal, or plastic
- Unrepresented small businesses
- Goal is to minimize the use of MeCl
 - liquid paint stripper formulations without MeCl
 - wet or dry media blasting
 - mechanical stripping operations such as sanding and grinding
 - thermal, cryogenic and other technologies
- GACT based on available MeCl alternatives, business protocol and current processes.

Surface Coating Categories

- **Plastic Parts**—Application of coating on a variety of substrates including metal and plastic
- **Autobody Refinishing**—Application of coating to a variety of vehicles as part of repair, maintenance, and restoration including automobiles, fleet & heavy duty trucks, agricultural & construction equipment, public transportation, etc.
 - Primarily small entities
 - Goal is to eliminate/reduce heavy metal emissions
 - GACT based on established regulatory requirements, business protocol, and current processes

GACT

- Paint Stripping
 - Best Management Practices
 - MeCl Minimization Plan
- Coating Operations
 - High volume low pressure (HVLP) spray gun
 - Proper training
 - Spray booth
 - Enclosed spray gun washing

Facilities & Target Emissions

Facility Operations	Source Population	Baseline Emissions (TPY)	Technology Approach
Paint Stripping <~200 gal/yr	Approx 2,000	~500	Best Management Practices (BMP) Only
Paint Stripping ≥~200 gal/yr	Approx 1,000	~3300	BMP and MeCl Minimization Plan
Autobody Refinishers	Approx 36,000	11.7	Spray Booth HVLP Spray Gun HVLP Training Spray Gun Washer
Miscellaneous Parts	Approx 830	0.7	

Drivers for GACT

- There are generally management practices used to reduce MeCl emissions
- Current coating processes were designed to meet specific codified regulatory requirements, minimize liability of shop owner, and increase market share.

Can translate into a direct cost savings to the operator with minimal effort

Estimated Impacts

Technology Approach	Initial Cost	Annual Cost	Target HAP Reduction	Dollars per Ton
Paint Stripping				
Best Practices	\$210,000	\$33,000	N/A	N/A
Minimization Plan	\$880,000	-\$920,000	1,200 TPY	-\$700
Surface Coating				
Spray Booth*	\$0	\$0	0	\$0
HVLP Spray Gun	\$0.44 MM	0	0.4 TPY	N/A
HVLP Training	\$20.0 MM	0	6.3 TPY	N/A
Spray Gun Washer	\$5.2 MM	0	0.2 TPY	N/A

*OSHA requires spray booths for all spray coating operations.

Development Time Table

- Proposal to OMB in July
- Signature of proposal in August
- Final rule to OMB in October
- Signature of final rule in December 2007

Questions/Concerns/Comments??