

Summary of Regulations:
National Emission Standards for Hazardous Air Pollutants (NESHAP):
Paints and Allied Products Manufacturing

**Area Sources Final Rule
40 CFR 63 Subpart CCCCCC (7C)
December 3, 2009**

This information will help you determine how your facility may be affected by the Paints and Allied Products Manufacturing NESHAP [40 CFR Part 63 Subpart CCCCCC (7C)].

Which facilities are affected?

Your facility is affected if you are an area source of hazardous air pollutants (HAP) and you process, use, or generate materials containing one or more of the following HAP: benzene, methylene chloride, and compounds of cadmium, chromium, lead, or nickel.

Area Source: Sources that emit less than 10 tons annually of a single HAP or less than 25 tons annually of a combination of HAP. For more information about area source rules, go to

<http://www.epa.gov/ttn/atw/area/arearules.html>

What are my requirements?

If you own or operate an area source paints and allied products manufacturing facility that processes, uses, or generates any of the target organic or metal HAP (benzene, methylene chloride, and compounds of cadmium, chromium, lead, or nickel), you must do the following:

1. When you are adding dry pigments and other solids that contain compounds of cadmium, chromium, lead, or nickel to a process vessel or milling and grinding equipment, you must operate a particulate control device to capture particulate emissions.
2. You must use a lid or cover on any process vessel that contains benzene or methylene chloride. The lid or cover must maintain contact along at least 90 percent of the rim.

To determine if your lid meets the 90 percent requirement, you must measure the circumference (rim length) of the process vessel. Then you must measure the length of any visible gaps between the lid and the rim and add them together. Subtract the sum of the visible gaps from the total circumference (rim length) and then divide by the circumference

(rim length) of the vessel. Multiplying this number by 100 will give the percentage of the process vessel that is covered.

Process vessel lid or cover example

A process vessel has a rim that measures 200 inches. When the lid is placed on the process vessel there are two visible gaps. The length of one gap measures 6 inches along the *rim* of the vessel, and the other gap measures 10 inches.

The equation for determining if this lid meets the 90 percent requirement is as follows:

$$\text{Lid Coverage} = \frac{200 - (6 + 10)}{200} \times 100\% = 92\%$$

In this case, the lid described above meets the 90 percent requirement.

If the percentage is less than 90 percent, you must fix or replace your process vessel cover. You must do this equation for each vessel.

Initial Notification of Applicability:

If you own or operate an existing affected source, you must submit an initial notification of applicability no later than June 1, 2010. New sources must submit the notification no later than 180 days after initial start-up or December 3, 2009, whichever is later.

Notification of Compliance Status:

Existing Sources: June 3, 2013

New Sources: No later than 180 days after initial start-up or June 10, 2010, whichever is later.

Annual Compliance Certification Report:

The report must be prepared by January 31 of each year. The report must be submitted only if a deviation occurred during the previous calendar year (January 1 through December 31).

For More Information

Copies of the rule and other materials can be found at the Tennessee Small Business Environmental Assistance Program's Paint and Allied Products Manufacturing webpage:

http://www.tn.gov/environment/ea/sbeap/sbeap_paintman.shtml

Other information on the Federal Rules can be found at

<http://www.epa.gov/ttn/atw/area/arearules.html>