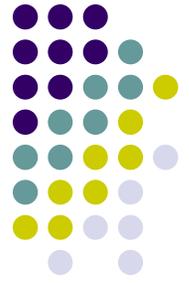




Paint and Allied Products Manufacturing

Area Source NESHAP

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Outreach and Information Division
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Introduction

- Paints, adhesives and inks
- October 15, 2009 court-ordered deadline
- Listed for regulation under section 112(k)
 - Particulate HAP: cadmium, chromium, lead, and nickel
 - Volatile HAP: benzene and methylene chloride



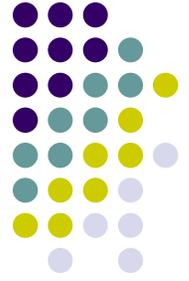
Background

- 2190 facilities
- 45% have <9 employees
 - 92% have <100
- Manufacturing process: 91% of emissions
- 4,853 tons/yr total HAP
 - 220 tons/yr HAP in Urban Air Toxics



Emissions

- Open vessels and fugitive
- Low metal HAP emissions
- Significant reduction since 1990



Emission Points and Controls

- Metal HAP is emitted during preassembly/premix and pigment grinding
 - Most facilities have controls
- Volatile HAP is emitted during mixing and cleaning
 - Most facilities use lids
 - No other control

Manufacturing Process

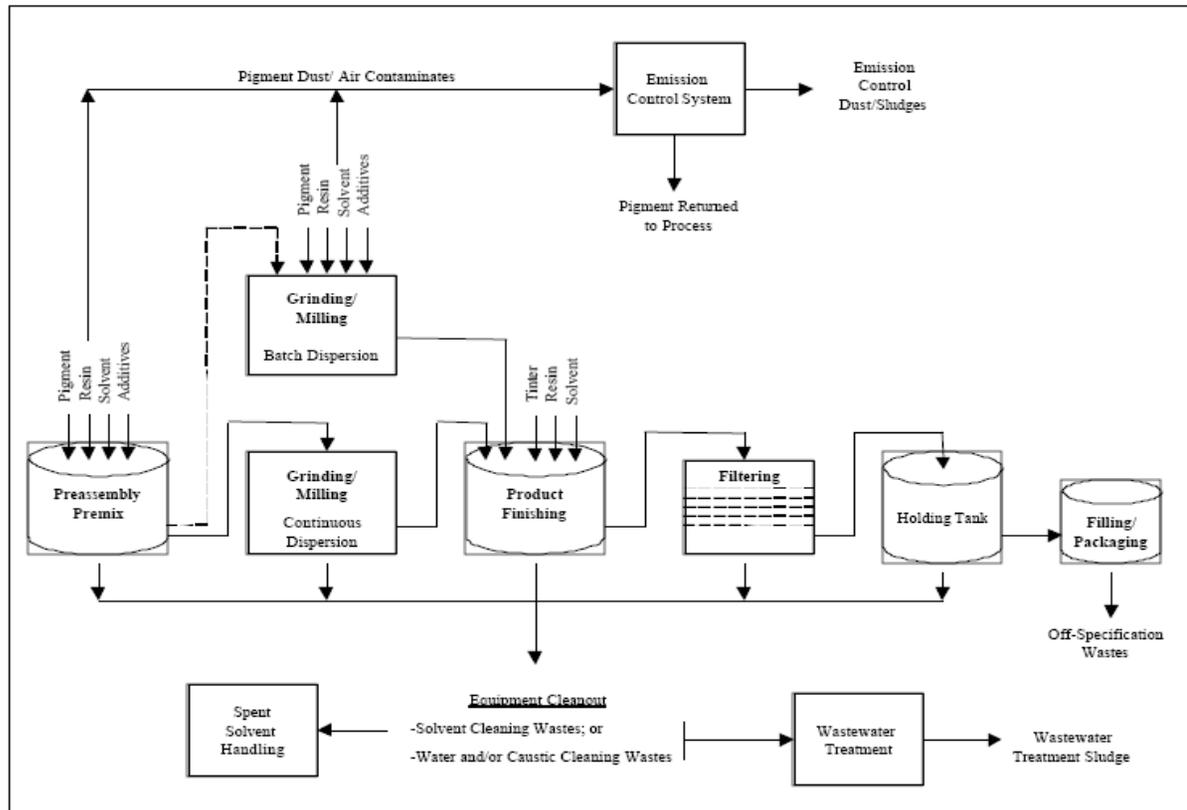


Figure 4-1 - Process Diagram for a Typical Paint Manufacturing Process

Applicability Recommendations



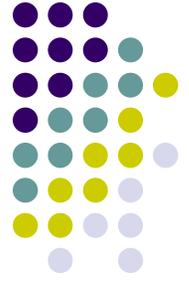
- Exclude facilities using materials with $<0.1\%/1\%$ of listed HAP metals
- No HAP use or emissions, only notification
- If rule applies, it covers all HAP emissions
- Easy to understand and document

Proposed GACT



- Management practices and particulate control devices for all facilities
- Based on current industry practices
- Data constrictions

Proposed GACT- Volatiles



1. Portable and stationary mixing tanks must be equipped with covers that completely cover the tank except for safe clearance of mixer shaft.
2. Lids must be maintained in good condition and contact must be maintained along at least 90 percent of the rim.
3. Containers with volatile HAP must be kept tightly closed when not in use.
4. Leaks, fugitive emissions, and spills should be minimized and immediately addressed.
5. Waste solvent must be kept in closed containers and rags or other materials used for cleaning must be placed in covered containers.



Total Costs

- Requiring particulate control devices on the facilities that currently don't operate one: \$3.1 million
- Lids on process vessels that don't currently use them: \$5,500



Emissions Reductions

- Particulate matter: 6,300 tons/yr
- Metal air toxics: 4.2 tons/yr
- Volatile air toxics: 170 tons/yr



Contact Information

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Comments to Docket:

ID No. EPA-HQ-OAR-2008-0053

www.epa.gov/oar/docket.html. Follow the instructions for submitting comments.

E-mail: a-and-r-Docket@epa.gov. Include Docket ID No. in the subject line.

Fax: (202) 566-9744, Attention Docket ID No. EPA-HQ-OAR-2008-0053.