

Are Aerosol Cans Subject to Subpart GG Cleaning Requirements?

Note: While these questions and answers constitute the best available information at this time, the EPA recommends that you consult your State or local air pollution control agency for any final determinations. State and local agencies may implement provisions that are more stringent than those contained in the NESHAP.

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Q: Are aerosol cleaning compounds used on aerospace vehicles or components covered by the cleaning requirements?

A: Yes

Q: Most MSDS includes the propellants in the vapor pressure. Does the vapor pressure calculation under 63.750(b)(2) include the propellants? We believe that the propellant is probably not part of the solvent (unless specifically designed as such) and should not be included in the VP calculation.

A: Propellant(s) are part of the cleaning solvent system and should be included in the vapor pressure equation.