

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.

## Aerospace NESHAP Q&A's

(1/2001)

**Q1:** Are aircraft exterior washing operations covered under hand wipe or flush cleaning?

**A1:** You may be subject to the hand-wipe cleaning or flush cleaning operations depending on how your aircraft exterior washing operations are performed. If you remove contaminants such as dirt, grease, oil and coating from an aerospace vehicle by physically rubbing it with materials such as a rag that has been moistened with a cleaning solvent, then you're covered under section 63.744(b) - hand wipe cleaning. If however, you remove contaminants such as dirt, grease, oil and coating from an aerospace vehicle by passing solvent over the exterior of the aircraft, then you're covered under section 63.744(d) - flush cleaning operations.

**Q2:** We have a cleaning operation where a cleaner is pumped from a drum onto parts to be cleaned, then the parts are scrubbed and the remaining solvents are drained back into the drum. Is this operation covered under Subpart GG?

**A2:** Yes, from your description, this operation would be covered as a flush cleaning operation under 63.744(d). Flush cleaning, as defined under 63.744(d), doesn't require the actual cleaning to be performed in an enclosed container. It only requires that the used cleaning solvent is emptied/directed into a container/collection system that is kept closed when not in use.

**Q3:** Under 63.750(a), data provided by the manufacturer for cleaning solvents use must "identify all components of cleaning solvents," does this include non-hazardous components?

**A3:** Chemical compositions that are not a Hazardous Air Pollutant (HAP) and Volatile Organic Compound (VOC) are not required unless the composition information is needed to complete calculations under 63.750. In addition, under section 63.741, cleaning solvents (as well as primers, topcoats, maskants, and strippers) that contain VOC and HAP <1% non-carcinogens or <0.1% carcinogens aren't covered under the NESHAP.

**Q4:** Must Method 24 be used or can manufacturers use other data to determine the VOC and HAP content? Do we need to require manufacturers to use Method 24 and supply results?

**A4:** Under 63.750(c)(a), the total organic HAP content for coatings that contain no exempt solvents, can be obtained by using manufacturer supplied data **OR** Method 24. The decision to require that a manufacturer perform Method 24 needs to be determined by the facility. You should be aware, however, that if formulation data is used for determining compliance and there is a discrepancy between formulation data and Method 24, Method 24 prevails.

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## **Aerospace NESHAP Q&A's**

(3/2001)

NOTE: Please note that this question was previously identified as Question #38 in the Aerospace compiled Q&A document. We have modified the answer slightly by removing the example that includes "flop-top or squirt bottles with small openings." We originally added this as an example after receiving a question about very small, squirt-type containers used in limited quantities and their need to be sealed at all times when not in use. Based on the information received at that time, EPA included the containers as an example. Recently however, EPA has received several questions by State and Local regulatory agencies as to the intent of this example, especially at facilities where very large quantities of these types of containers are used. It continues to be EPA's position that facilities should coordinate with the State and local regulatory agency when determining if containers of this type are classified as closed. To prevent further confusion, we have eliminated the example.

Q: What is the definition of "closed container" in the cleaning provisions?

A: The rule does not provide a definition for "closed container," but does say (§63.744(a)(1)) that bags and containers should be kept closed at all times except when depositing or removing materials from the container. Also, bags or containers should be designed so as to contain the vapors of the cleaning solvent. This is not interpreted to mean that the container should be tested to be emission-free. Common sense would indicate that a close-fitting lid or closure device should be on the container, and that the container should be kept shut when not in use. For example, if a lid is purposely propped open, that would not be considered a closed container, however, if a lid inadvertently has a small gap in the "closed" position, that would constitute a closed container. Again this is subject to the permitting authorities discretion, and it would be best to discuss any possible concerns with them.