

APPENDIX 112J

**AEROSPACE MANUFACTURING AND REWORK FACILITIES
(40 CFR 63 Subpart GG)**

CAA SECTION 112 NESHAP

Synopsis: Aerospace Manufacturing and Rework Facilities NESHAP

CFR Location: 40 CFR 63 Subpart GG

Regulatory Activity: Final Rule: 1 Sep 95 (60 FR 45948)
 Correction: 9 Feb 96 (61 FR 4902)
 Amendments: 27 Mar 98 (63 FR 15006)
 Correction: 10 Apr 98 (63 FR 17930)
 Amendments: 1 Sep 98 (63 FR 46525)

Affected Sources: Major Sources of HAPs

Rule Summary: This rule affects new and existing aerospace coating, cleaning, and repainting operations. There are a large variety of aerospace operations exempted from the rule. Compliance can be achieved using compliant materials, techniques, and/or control devices. The NESHAP recordkeeping and reporting requirements vary depending on the specific type of operation.

NESHAP DEADLINE MATRIX

Source	Date C/R Commenced	Date of Startup	Notification Requirements	Notification Deadlines ^a	Compliance Deadline	Compliance Status Report Deadline	Ongoing Status Reports
Existing	≤06 Jun 94	≤01 Sep 95	Initial Notification	1 Sep 97 63.753(a)(2)	01 Sep 98 63.749(a)	1 May 99 for most existing sources or 60 days after completion of relevant compliance demonstration or as required by Title V permit. 63.9(h)	Operation-specific. Annual or semiannual as required. 40 CFR 63 63.10 and 63.753
		>01 Sep 95	Not Addressed: Assume same as above.	Not Addressed: Assume same as above.			
New	>06 Jun 94 ≤01 Sep 95	≤01 Sep 95	Initial Notification	1 Sep 97 63.753(a)(2)	01 Sep 95 63.749(a)		
		>01 Sep 95	Application for approval of C/R.	ASAP before startup or 01 Nov 95. 63.5(d)(1)	Startup 63.749(a)		
	>01 Sep 95	Application for approval of C/R.	ASAP before C/R. 63.5(d)(1)				

C/R = construction or reconstruction ASAP = as soon as practicable NLT = not later than

^a Existing and new area sources that become major sources must submit an initial notification 120 days after becoming major. 63.9(b)(2)

REGULATORY STATUS

EPA issued the final NESHAP for Aerospace Manufacturing And Rework Facilities on 01 Sep 95 (60 FR 45948). Subsequent corrections and amendments are reflected in the latest version of the Code of Federal Regulations, Volume 40, Part 63, Subpart GG and are also highlighted in the Synopsis Table and the Subsequent Regulatory Activity sections of this appendix.

RULE SUMMARY

Applicability and Standards

This rule only applies to installations which are major HAP sources. It affects cleaning, surface coating, depainting, and maskant operations associated with the manufacture, rework, maintenance, and repair of aerospace vehicles and components. An *aerospace vehicle or component* means any fabricated part, processed part, assembly of parts, or completed unit, with the exception of electronic components, of any aircraft including but not limited to airplanes, helicopters, missiles, rockets, and space vehicles. Determining whether a specific operation is affected is not that easy because there are numerous exemptions for each operation type that is regulated.

The EPA Implementation Guide (EPA-456/R-97-006) contains an excellent overview of the complex applicability language and the requirements of the rule. EPA continues to update this guide to reflect subsequent amendments. It can be downloaded from the Unified Air Toxics Web Page for this rule at <http://www.epa.gov/ttn/uatw/aerosp/aeropg.html>. This document is so well written that we determined it unnecessary to include a comprehensive summary in this appendix. If you have difficulty accessing this document contact a HAP Subcommittee member.

The compliance deadline for existing sources was 1 Sep 98.

SUBSEQUENT REGULATORY ACTIVITY

09 Feb 96 (61 FR 4902) Correction

EPA changed the submission deadline for initial notification reports for existing sources from 30 Dec 95 to 1 Sep 97. EPA had informed their regional offices of this intended change in a memorandum dated 18 Dec 95. However, publication was delayed due to the impact of the government shutdown on EPA.

17 Dec 96 (61 FR 66266) Correction

A minor typographical correction was made.

27 Mar 98 (63 FR 15006) Final Amendments

These extensive supplemental amendments include:

- Corrections to several references in the rule;
- Revisions and additions to definitions;
- Clarification of the applicability of the cleaning operations standards;
- Clarification of the applicability of the rule to space vehicles;
- Addition of new standards for Type I chemical milling maskants;
- Addition of a test method for determining the filtration efficiency of dry particulate filters;
- Revision of standards for new and existing sources using dry particulate filters to control emissions from topcoat and primer application and depainting operations;
- Addition of an exemption for certain water-reducible coatings; addition of an exemption from inorganic HAP requirements for hand-held spray can applications;
- Addition of an essential use exemption for cleaning solvents; clarification of compliance dates;
- Clarification of the applicability of new source MACT to spray booths;
- Clarification and addition of emissions averaging provisions;
- Revision of the requirements for new and existing primer and topcoat application operations;
- Clarification of monitoring requirements for dry particulate filter usage;
- Revision of the standard for depainting operations;
- Addition of a cross reference to requirements in the General Provisions in subpart A of part 63;
- Addition of appendix A to this subpart containing definitions for specialty coatings; and
- Minor technical corrections.

In this same action, EPA announced the availability of the final Aerospace Control Techniques Guideline (CTG) Document which States must implement in ozone nonattainment areas. **Important!** Though exempt under the NESHAP, specialty coatings are regulated under the CTG. More information on the CTG can be found in Appendix 183C.

10 Apr 98 (63 FR 17930) Correction

A minor typographical correction was made.

1 Sep 98 (63 FR 46525) Final Amendments

These amendments include the following:

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- Definitions and standards for general aviation aircraft and general aviation aircraft rework facilities.
- Clarification of relationship between Federal Aviation Administration and NESHAP regulations.
- Hand-wipe cleaning: Removal of references to §112(l) and equivalent volume reduction demonstration.
- Exemption for cleaning of automated spray equipment nozzle tips.
- Monitoring parameters for pumpless waterwash systems.
- Exclusion of charged media using test method 319.
- Other technical and miscellaneous corrections.

MILITARY SOURCES

This rule affects many military installations that are major HAP sources. Any aerospace vehicles or components stationed, maintained, or reworked on major HAP source installations are potentially affected by this rule. Even routine squadron level maintenance is affected.

Although most military facilities are achieving compliance by using compliant coatings and approved solvents, the recordkeeping and reporting requirements are still burdensome.

CONTACTS

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