

APPENDIX 112L

**MISCELLANEOUS METAL PART AND PRODUCTS NESHAP
(SURFACE COATINGS)
(Prerule Stage)**

CAA SECTION 112 NESHAP

REGULATION STATUS

The Miscellaneous Metal Parts and Products (MMPP) NESHAP is scheduled for promulgation on 15 Nov 00. EPA is presently analyzing data received from industry and military facility coating operations to determine the MACT floor and will likely propose a rule in late 1999 or early 2000.

The Services have been working with EPA as this rule develops. To monitor EPA's progress, refer to the HAP Subcommittee Status Reports and the HAP Status Binder Web page for this appendix on DENIX. EPA maintains a web site for this rule at http://www.epa.gov/ttn/uatw/coat/misc/misc_met.html.

Background

In July 1998, EPA visited Corpus Christi Army Depot and Kelley Air Force Base to observe their coating and repainting operations and become more familiar with military facilities.

In October 1998, EPA mailed formal information collection request (ICR) letters to the military and private industry. In lieu of EPA sending the ICR letter to each military department, EPA allowed each Service to 1) provide addresses for major HAP source installations that are representative of other similar "types" of facilities, and 2) provide a multiplication factor for estimating the emissions from all similar major HAP source installations within each type. The following facilities received the ICR.

Air Force

- Andrews AFB
- Cape Canaveral AS (c/o Patrick AFB, FL)
- Tinker AFB, OK
- Hill AFB, UT
- Kelly AFB, TX
- Eglin AFB, FL

Army

- Anniston Army Depot, AL
- Fort Riley, KS
- Fort Leonard Wood, MO
- Tobyhanna Army Depot, PA
- Lake City Army Ammunition Plant, MO
- Yuma Proving Ground, AZ

Navy

- NSY Pearl Harbor, HI
- NAS Jacksonville, FL
- NAD Cherry Point, NC
- NSWC Indianhead, MD

Marine Corps

- MCAS Cherry Point, NC
- MCAS Miramar, CA
- MCB Camp Lejeune, NC
- MCLB Barstow, CA

DISCUSSION

Applicability

EPA has not yet indicated whether the rule will be limited to major HAP sources or apply to both major and area HAP sources.

The applicability of recent NESHAPs for surface coating operations such as the Aerospace and Shipbuilding rules are limited to major HAP sources. EPA will most likely use the same approach and limit this rule to major HAP sources.

The intent of this source category is to cover sources not addressed by other coating rules. This rule will not affect operations specifically "exempted" by other NESHAPs but may affect operations that are not covered by other NESHAPs. Operations involving the coating of "metal stationary structures" will not be covered. EPA informed facilities responding to their ICR that they did not need to send data on the coating of metal stationary structures such as above ground storage tanks, buildings, or stationary cranes. However, if the structures are moveable (portable/moveable above ground tanks, cranes on rail tracks, etc.) then the data for these coating operations were to be provided.

EPA is looking at more than paints and primers. They are looking at all coating operations that involve metal parts and emit HAPs. Any coating or coating removal operation involving metal surfaces that is not covered or exempted by another NESHAP is fair game for this rule.

EPA is developing similar "catch all" rules for "Miscellaneous Plastic Parts and Products" and "Paint Stripping Operations."

Potential Standards

We expect this rule to use a similar approach as the Aerospace and Shipbuilding NESHAPs. Refer to [Appendix 112J](#) and [Appendix 112K](#) for information on the Aerospace and Shipbuilding rules, respectively. For coatings, the use of low VOC/HAP coatings will be the main compliance option although they will probably

allow emission control devices for those who cannot use alternative coatings. Two or three-stage filters will likely be required on booths when inorganic HAPs are being applied or removed. The use of HAP-containing chemical strippers will be strongly discouraged although a control device option may be available.

MILITARY SOURCES

This rule potentially affects any coating operation performed on a metal surface (excluding stationary structures) that is not covered or specifically exempted by another NESHAP source category.

Other NESHAP source categories that affect metal surface coating operations include but are not limited to:

- Aerospace Manufacturing and Rework
- Shipbuilding and Repair
- Large Appliances
- Auto and Light Duty Trucks

Military sources potentially affected by this rule include:

- Tactical vehicles
- Heavy duty nontactical vehicles
- Parts of aerospace vehicles, ships, appliances, and automobile parts that are not covered or specifically exempted by their respective NESHAPs.

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