

## **APPENDIX 112M**

**PAINT STRIPPING OPERATIONS NESHAP  
(Prerule Stage)**

**CAA SECTION 112 NESHAP**



## REGULATION STATUS

The Paint Stripping Operations NESHAP for major HAP sources was scheduled to be issued by 15 Nov 00 but will either be issued in mid to late 2002 or not at all. They have no money in fiscal year (FY) 2000 to work on this rule and so far they have not identified a significant major source paint stripping operation. Regardless of what EPA decides to do with the major source rule, they will definitely issue a NESHAP for area source operations in 2004 as part of their [Integrated Urban Air Toxics Strategy](#).

The Services continue to work with EPA as these rules develop. To monitor EPA's progress, refer to the [HAP Subcommittee Status Reports](#) and the HAP Status Binder Web page for this appendix on DENIX.

## Background

In January 1999, EPA visited Anniston Army Depot (ANAD) to observe their chemical and mechanical depainting operations and to become more familiar with military facilities. Methylene chloride, a prime target of this future rule, is the only chemical stripper used at ANAD. However, to complete the stripping process nearly all parts are given an abrasive treatment such as steel shot, walnut hulls, garnet, or sand. Although EPA did not see anything unexpected, seeing the actual operations and learning about inherent limitations of various depainting operations will help them develop a more intelligent rule. ANAD depainting operations will most likely be covered by other NESHAPs and not a paint stripping rule.

In January 1999, EPA released a Draft Presumptive MACT (P-MACT) document for this source category. The P-MACT is supposed to be an educated guess of what the proposed rule will look like once the data is collected. The HAP Subcommittee provided [informal feedback](#) on the P-MACT document to the EPA contractor suggesting the final P-MACT document be more substantive.

In July 1999, the Services provided a [list of military installations](#) for EPA to include in their survey and at the same time pointed out that other NESHAPs would cover most military depainting operations. EPA was planning to issue a final P-MACT document and begin the formal data collection process during the Summer of 1999, but this did not happen.

In November 1999, EPA informed the HAP Subcommittee that they might not send the survey because they have not identified a single major source paint stripping operation that would not be covered by another NESHAP. EPA said they were even considering delisting the major source category. The HAP Subcommittee followed up with an [e-mail](#) to EPA (Mr. Pagan) concluding that all significant military depainting operations would be covered by other NESHAPs and provided limited data to support our conclusion.

As of April 2000, EPA indicated they were not sure if they have the authority to delist the major source category but that there are no imminent plans to proceed with a data call because their FY 2000 funding for this rule was eliminated. They still have not identified a significant paint stripping operation that would be a major HAP source itself and would not be covered by another NESHAP. However, there are insignificant operations that occur on major HAP source facilities. Jaime Pagan (EPA) said they may be constrained by law to consider insignificant sources located on major HAP sources as major HAP sources. Hopefully EPA will find a legal way out of their strict interpretation and proceed with delisting.

## DISCUSSION

### Applicability

#### *Major Source Rule*

If EPA decides to proceed with this rule instead of delisting, it would cover depainting operations not addressed by other major source surface coating NESHAPs. We do not expect this rule to affect depainting operations specifically "exempted" by other NESHAPs, but it could affect operations that are "not covered" by other NESHAPs. For example, the [Shipbuilding NESHAP](#) does not cover depainting operations, therefore this rule will potentially cover ship depainting operations. In contrast, it is expected that [Miscellaneous Metal Parts and Products NESHAP](#) and the Miscellaneous Plastic Parts and Products NESHAP will cover both painting and depainting operations. Thus depainting operations covered by those rules will not be covered by the Paint Stripping Operations NESHAP.

EPA is looking at the depainting of any substrate; metal, wood, plastic, etc. They seem to be focusing on organic HAP emissions from chemical depainting but have not yet ruled out inorganic HAP emissions from mechanical depainting. The use of HAP-containing chemical strippers will be strongly discouraged although a control device option may be available. If they regulate inorganic HAP emissions, two or three-stage filters would likely be required when coatings containing such HAPs are being mechanically removed.

#### *Area Source Rule*

EPA has not even started this rulemaking but we can still speculate on potential applicability. Since this area source category was listed to address urban area risks, the rule will most likely be limited to organic HAP emissions from chemical depainting operations. It will affect a lot of mom-and-pop wood furniture refinishing operations. In addition, any depainting operation not covered by another NESHAP would be fair game.

## MILITARY SOURCES

These rules potentially affect depainting operations that are not covered by another NESHAP source category.

NESHAPs that already cover depainting operations include but are not limited to:

- [Aerospace Manufacturing and Rework Facilities NESHAP](#)

Future NESHAPs that will likely cover depainting operations include but are not limited to:

- [Miscellaneous Metal Parts and Products NESHAP](#)
- Miscellaneous Plastic Parts and Products NESHAP

NESHAPs that do not cover depainting operations and thus source categories that may be covered under these rules include but are not limited to:

- [Shipbuilding and Ship Repair NESHAP](#)
- [Wood Furniture NESHAP](#)

The impact of these rules should be minimal because most significant depainting operations are or will be covered by other NESHAPs. In November 1999, The HAP Subcommittee sent EPA an [e-mail message](#) characterizing the limited impact a major source rule would have on military depainting operations.

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