

APPENDIX 183D

**SHIPBUILDING AND REPAIR FACILITIES
(SURFACE COATINGS)
CONTROL TECHNIQUES GUIDELINE (CTG) DOCUMENT
CAA SECTION 183 FEDERAL OZONE MEASURES**

REGULATION STATUS

On 27 Aug 96 ([61 FR 44050](#)) EPA issued the final Control Techniques Guideline (CTG) for Shipbuilding and Ship Repair Facilities.

This CTG was not issued as a stand alone document but as a combination of the information contained in the federal register notice and the previously published Alternative Control Techniques (ACT) document (EPA-453/R-94-032).

SUMMARY OF THE PRESUMPTIVE RACT REQUIREMENTS

Applicability

A CTG is not a rule but rather a control technology information base for State and local air pollution control authorities to proceed with their own analyses and ultimately issue their own regulations. This CTG presents reasonably available control technology (RACT) and best available control measure (BACM) options for controlling VOC emissions from ship surface coating operations. RACT is the lowest emission limitation that a particular source is capable of meeting by the application of a control technology that is reasonably available considering technological and economic feasibility. BACM is the most effective equipment, measures, processes, methods, systems or techniques, including chemical reformulation, product or feedstock substitution, repackaging, and directions for use, consumption, storage, or disposal. The CAA requires States to issue such standards in moderate, serious, or severe ozone nonattainment areas for affected sources that have the potential to emit greater than or equal to 25 tons per year of VOCs.

Standards

The EPA has determined that the use of lower VOC paints is the only technologically and economically feasible level of control for the shipbuilding industry. Therefore, the VOC coating limits for BACM are the same the limits contained in the NESHAP. The CTG recommends that States use the NESHAP language as a basis to draft their VOC rules for ozone nonattainment areas.

Since the standards are identical to the NESHAP they will not be duplicated in this appendix. Refer to Appendix 112K for information regarding the NESHAP.

MILITARY SOURCES

Once implemented, this CTG essentially extends the requirements of the Shipbuilding NESHAP (which applies to major HAP sources) to military installations that 1) emit 25 tons per year or more of VOC and 2) are located in ozone nonattainment areas.

Although most military facilities can achieve compliance by using compliant coatings and approved solvents, the recordkeeping and reporting requirements will still be burdensome.

CONTACTS

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