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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Office of Air Quality Planning and Standards  
Research Triangle Park, North Carolina 27711

APR 25 1988

MEMORANDUM

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SUBJECT: LAER Emission Limits for Automobile and Light-Duty Truck  
Topcoat Operations

FROM: Jack R. Farmer, Director  
Emission Standards Division (MD-13)

TO: See Below

At the March Air Directors' meeting in Seattle, Washington, some questions were raised concerning the Agency's current position regarding Lowest Achievable Emission Rate (LAER) emission limits for automobile and light-duty truck topcoat operations. This memorandum describes our position on this issue.

The LAER emission limit for automobile and light-duty truck topcoat operations should be at least as stringent as 12.26 pounds of volatile organic compound (VOC) per gallon of solids deposited with compliance on a daily basis using actual measured transfer efficiency values. This limit should apply regardless of the material of construction (substrate) of the vehicles being coated (e.g. metal, plastic or combination.)

The basis for citing this emission limit as LAER is the permit (see attachment) for Subaru/Isuzu in Lafayette, Indiana. The permit for Toyota in Georgetown, Kentucky, may also be used to support this limit.

When the industry has argued for less stringent emission limits because of the type of coating or the type of substrate planned, we have maintained that "painting cars is painting cars," and these factors do not justify less stringent emission limits. We have taken this position because technology and manufacturing processes constantly change and evolve; the manufacturer is responsible for ensuring that any new process meets environmental as well as product requirements.

The procedure which we feel is most appropriate for determining compliance with this LAER limit is the protocol which we have been developing in conjunction with the Motor Vehicle Manufacturers Association (MVMA). We met with the MVMA on March 22, 1988, to discuss the draft

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protocol. We are making some changes in the protocol based upon the discussion at this meeting. We expect to have the final protocol ready soon. If you have an immediate need to provide a compliance procedure for a topcoat LAER determination, please contact Dave Salman at FTS-629-5417.

Attachment

Addressees:

Irwin Dickstein, Reg VIII  
Louis Gitto, Reg I  
William Hathaway, Reg VI

David Howekamp, Reg IX  
David Kee, Reg V  
Thomas Maslany, Reg III  
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Winston Smith, Reg IV  
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Bill Repsher, LE-134A  
Steve Rosenthal, Region V  
Cynthia Stahl, Reg III  
David Sullivan/Willie Kelly, Reg VI  
Jean Thompson, Reg III  
Mary Tietjen, Reg VII  
Tim Williamson, Reg I  
Bill Wruble/Dennis Beauregard, Reg IX

Control No. 000547  
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CONSTRUCTION PERMIT  
OFFICE OF AIR MANAGEMENT  
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
105 South Meridian Street  
Indianapolis, Indiana 46225

Subaru-Isuzu Automotive Incorporated, Indiana Plant  
Intersection of State Road 38  
and  
Interstate 65  
near Lafayette, Indiana

is hereby authorized to construct

a new automobile and light duty truck assembly plant at the above location southeast of Lafayette, Indiana, consisting of a stamping shop, body shop, paint shop, and trim and final assembly shop. Emission of air pollutants will occur primarily from metal working operations, surface coating operations and combustion of natural gas.

This permit is issued under provisions of Rule 325 IAC 2-1.1, with findings and conditions listed on the attached pages.

Identification No. PSD (79) 1651  
Expiration Date N/A

Date Issued July 30, 1989  
Issued by Nancy A. Mobley  
[signed]  
Commissioner

