Paints and Allied Products Manufacturing:
Area Source Standards
Final Rule
March 25, 2010
Applicability

- Paint & Coating Manufacturing 325510
- Adhesive Manufacturing 325520
- Printing Ink Manufacturing 325910
- All Other Misc. Chemical Product and Preparation Manufacturing 325998
  - Indelible, India, writing, and stamp pad inks only
Applicability

- Does not apply to:
  - Manufacture of thinners, paint removers, brush cleaners and mold release agents
  - Manufacture of electroplated and electroless metal films
  - Manufacture of raw materials
    - Resins, pigments, solvents
  - Activities by end users to ready materials for application
Affected Source

- YES
  - Paint and allied products manufacturing facilities that process, use or generate the listed HAP

- NO
  - Facilities that no longer process, use or generate the listed HAP
  - R&D facilities
Listed HAP

- Volatile
  - Benzene
  - Methylene chloride

- Metal compounds
  - Cadmium
  - Chromium
  - Lead
  - Nickel
Paints Rule Stats

- Almost 2200 facilities

- Baseline HAP emissions 4800 tpy

- Anticipated emission reductions
  - 169 tpy organic HAP
  - 4.2 tpy metal HAP (6,300 tpy PM)

- Capital cost is $8.1 million and the annualized cost is $3.1 million per year

- Rule promulgated November 16, 2009
  - Proposed May 22, 2009
Volatile HAP Requirements

- Applies to all storage and process vessels, except mixing vessels
- Equip vessels with covers that maintain 90% contact with rim
- Exempts quality control testing and product sampling
Metal HAP Requirements

- When adding of dry pigments and solids containing listed HAP to a process vessels or to the grinding and milling process you must:
  1. Operate a PM capture system
  2. Fully enclose the equipment
  3. Use pigments and solids in a solution or slurry

- Visible emissions from exhaust must not exceed 10% opacity if venting to atmosphere
  - Requirement doesn’t apply if device doesn’t vent to atmosphere
Dates

- **Initial notice of applicability**
  - Existing sources: June 1, 2010
  - New sources: 180 days after startup or June 1, 2010, whichever is later

- **Compliance**
  - Existing sources: December 3, 2012
  - New sources: December 3, 2009

- **Notification of Compliance Status**
  - Existing sources: June 3, 2013
  - New sources: June 10, 2010 or 180 days after initial startup, whichever is later
Upcoming Amendments

- Technical correction published 75 FR 10185 on March 5, 2010
  - Minor edits and renumbering

- Direct final in May
Available Implementation Tools

- [http://www.epa.gov/ttn/atw/area/arearules.html#final](http://www.epa.gov/ttn/atw/area/arearules.html#final)
  ○ Area Source Rule Home Page on TTN
- [http://www.epa.gov/ttn/atw/area/arearules.html#inot](http://www.epa.gov/ttn/atw/area/arearules.html#inot)
  ○ Initial Notification and Compliance form examples
  ○ Applicability Determination Index
  ○ FR Notice for final rule