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

10 AUG 1990

MEMORANDUM

SUBJECT: Exemption for Low-Use Coatings

FROM: G. T. Helms, Chief *Tom*
Ozone/Carbon Monoxide Programs Branch

TO: Chief, Air Branch, Regions I-X

The purpose of this memorandum is to clarify an issue raised in a meeting of the ozone/volatile organic compound (VOC) policy work group concerning a low-use exemption for coatings. Several Regions asked whether low-use coatings could be exempted from the control techniques guideline (CTG) for miscellaneous metal parts and products and for other applicable source categories.

A low-use exemption for specialty or other coatings may be reasonable for a source that uses small quantities for intermittent or specialty-type operations. Previous guidance has allowed the use of a coatings usage rate as the basis for an exemption if it is shown to be equivalent to emission rate cutoffs (Issues Relating to VOC Regulation Cutoffs, Deficiencies, and Deviations, May 25, 1988). At least one district in California allows an exemption for facilities that use less than 20 gallons per year not to exceed 50 gallons per year plantwide. Oklahoma allows an exemption for low-use coatings in site-specific alternate reasonably available control technology (RACT) requirements for the aerospace industry if the total usage in the aggregate for all such coatings at the plant does not exceed 55 gallons per year.

Upon considering the States' experiences with the coatings, we believe that a plantwide cutoff of 55 gallons per rolling 12-month period for all low-use coatings in the aggregate used at a facility is reasonable. Thus, we recommend that you propose for approval, as State implementation plan (SIP) revisions, any VOC regulations that exempt low-use coatings from the requirements of the applicable CTG's if the plantwide consumption of these coatings in the aggregate is less than or equal to 55 gallons during the previous 12 months. Use of this plantwide cutoff should be limited by a federally enforceable permit. For high VOC coatings, this exemption would result in relatively low VOC emissions (e.g., a coating with a VOC content of 6 pounds per gallon of coating would result in approximately 0.2 tons per year VOC emissions on a plantwide basis).

This exemption applies to facilities already subject to RACT for CTG sources; therefore, sources emitting less than 10 tons per year (potential) or 3 pounds per hour, 15 pounds per day (actual) are not affected. Sources wishing to take advantage of a low-use coating exemption should notify the

State agency prior to using this exemption, and should identify the composition or percentages of solid and liquid components for each low-use coating. The State may wish to specify that all existing sources wishing to use this exemption notify the State by a specific date (i.e., a specified number of days following the effective date of the rule.) This exemption could be identified in the State permit. Compliance would be based on the source's ability to stay below 55 gallons per rolling 12-month period for all low-use coatings. Once the total volume used of all specifically exempted, noncomplying low-use coatings exceeds 55 gallons during the previous 12 months, then the source is in violation. In this case, the source would be required to comply with RACT and would no longer be eligible to apply for a permit that would allow a low-use coating exemption.

Obviously, good records are essential in order for this type of exemption to work properly. To assist enforcement personnel in identifying what coatings at a particular facility are exempt, the source owner or operator should maintain purchase records and keep a log (preferably daily) of exempt coatings. Plant personnel should record the type of coating and the quantity used over time (e.g., daily), as well as the coating composition (e.g., VOC content) of each coating. Recordkeeping should be consistent with the procedures published in the guidance manual, "Recordkeeping Guidance Document for Surface Coating Operations and the Graphic Arts Industry."

If you have any questions, please call John Silvasi (FTS 629-5666) or David Cole (FTS 629-5565).

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