

Surface Coating of Plastic Parts and Products

A Closer Look at Air Quality Requirements

Surface coaters of Plastic Parts and Products in Colorado are subject to very specific and often complex State and Federal air quality requirements that exist above and beyond reporting and permitting requirements common to other surface coating operations. This fact sheet supplements the general regulatory information provided in *A Guide to Environmental Regulations for Colorado Surface Coating Operations*. Specific requirements for surface coaters of plastic parts and products covered in this fact sheet include Colorado Air Regulation No. 7, Federal Maximum Achievable Control Technology Standards (MACT), and Federal New Source Performance Standards (NSPS).

Colorado Air Regulation No. 7

Colorado Air Regulation No. 7 limits volatile organic compound (VOC) emissions from all businesses in Colorado. Regulation No. 7 is available for download through the Colorado Department of Public Health and Environment (CDPHE) Air Pollution Control Division (APCD) web page at www.cdphe.state.co.us/op/regs/airregs.asp.

The *General Provisions* of Regulation No. 7 require select Colorado surface coaters to reduce emissions using Reasonably Achievable Control Technology (**RACT**). These requirements may include the use of low VOC coatings, high transfer efficiency spray guns, or other technology such as thermal oxidizers that achieve a high degree of emission control.

Surface coaters of plastic-film located in the Denver-Metro area are also subject to the *Specific Provisions* of Regulation No. 7 contained in Section IX.A and IX.J. These provisions include limits on the content of VOCs allowed in certain coatings applied at the facility.

Is Your Business Affected by the *Specific Provisions* of Regulation No. 7?

Your business is affected by the *Specific Provisions* of Regulation No. 7 if you surface coat plastic parts and products in the Denver 1-Hour Ozone Attainment/Maintenance Area, which includes:

All of Denver, Broomfield, Jefferson, Douglas, and Boulder County (excluding Rocky Mountain National Park) and the western portions of Adams and Arapahoe Counties.

Plastic-Film Coating means . . .

Applying a uniform layer of "surface coating" to a flexible web or sheet of thin plastic substance, excluding all rubbers and vinyls (i.e., polyvinyl chloride) except for vinyl tapes and vinyl coated products with an adhesive or pressure-sensitive coating. It includes, but is not limited to: plastic typewriter ribbons, photographic film, adhesive tapes, and magnetic recording tapes. (*Reg. No. 7, Section IX.J.1*).

A Guide to Environmental Regulations for Colorado Surface Coating Operations and supplemental fact sheets for other types of surface coaters are available through the APCD Guidance Document Library at www.cdphe.state.co.us/ap/stationarylibrary.html

Emission Limits

Surface coaters affected by the specific provisions of Regulation No. 7 must demonstrate compliance, on a daily basis, with the VOC emission limits shown in Table 1 (*Reg. No. 7, Section IX.J.3*). The CDPHE Small Business Assistance Program (SBAP) can provide guidance and tools to businesses required to track and record daily VOC emissions.

Table 1: Emission Limits (Regulation 7 – Section IX.J)

TYPE OF COATING	KILOGRAM OF VOC/ LITER OF COATING (as applied)	POUND OF VOC/ GALLON OF COATING (as applied)
All coatings in the plastic-film coating line	0.35	2.9

Additional Recordkeeping Requirements

Surface coaters affected by Regulation No. 7 using add-on control equipment must also maintain **daily** records as listed in Table 2.

Table 2: Overview of Additional Reporting Requirements (Regulation 7 – Section IX.A)

ADD-ON CONTROL EQUIPMENT	REQUIRED RECORDKEEPING
Capture System	Fan power use, duct flow, duct pressure
Carbon Adsorber	Bed temperature, bed vacuum pressure, pressure at the vacuum pump, accumulated time of operation, concentration of VOC in the outlet gas, solvent recovery
Refrigeration System	Compressor discharge and suction pressures, condenser fluid temperature, solvent recovery
Incinerator System	Exhaust gas temperature, temperature rise across a catalytic incinerator bed, flame temperature, accumulated time of incineration

Maximum Achievable Control Technology (MACT) Standards

Some very select surface coaters of plastic parts and products are subject to federal regulations called Maximum Achievable Control Technology (MACT) standards. Specifically, surface coaters of plastic parts and products that are major sources of hazardous air pollutants (HAPs) must comply with the MACT standards provided in 40 CFR Part 63, Subpart PPPP. Surface coaters that were operating on or before December 4, 2002 must be in compliance with the standard by April 19, 2007, while all other affected surface coaters must be in compliance by April 19, 2004 or the source startup date.

The USEPA provides extensive guidance on Subpart PPPP at the **Implementation Information for the Surface Coating MACTs** webpage located at www.epa.gov/ttn/atw/coat/common/coatingsdisc.html.

Is Your Business Affected by Subpart PPPP?

An Affected Source is . . . (§§63.4481 and 63.4482)

Any new or existing facility that is a *major source* and applies coatings to *plastic parts and products*.

A Major Source is . . .

A facility that emits (or is located at or is part of a facility that emits) over ten tons per year of a single HAP or over 25 tons per year of total HAPs.

The MACT standard for surface coaters of plastic parts and products is available for download through the Electronic Code of Federal Regulations at **www.gpoaccess.gov/ecfr/index.html** (search under Title 40, Volume 12, Part 63, Subpart PPPP)

Plastic parts and products means . . .

Plastic components of the following types of products: motor vehicle parts and accessories for automobiles, trucks, RVs; sporting and recreational goods; toys; business machines; laboratory and medical equipment; and household and other consumer products.

Coatings are . . .

Materials applied to a substrate for decorative, protective, or functional purposes, including but not limited to paints, sealants, caulks, inks, adhesives, and maskants.

*Exemptions to Subpart PPPP are provided in §63.4481.

Emission Limits

Surface coaters affected by Subpart PPPP must demonstrate compliance with the HAP emission limits shown in Table 3 (§63.4490):

Table 3: Emission Limits (40 CFR Part 63, Subpart PPPP)

TYPE OF COATING	EXISTING SOURCE (OPERATING ON OR BEFORE DECEMBER 4, 2002)		NEW/RECONSTRUCTED SOURCE (BEGINNING OPERATION AFTER DECEMBER 4, 2002)	
	KILOGRAM OF HAP/ LITER OF SOLIDS (as applied)	POUND OF HAP/ GALLON OF SOLIDS (as applied)	KILOGRAM OF HAP/ LITER OF SOLIDS (as applied)	POUND OF HAP/ GALLON OF SOLIDS (as applied)
General Use Coating	0.16	1.34	0.16	1.34
Automotive Lamp Coating	0.45	3.76	0.26	2.17
Thermoplastic Olefin (TPO) Coating	0.26	2.17	0.22	1.84
New Assembled On-Road Vehicle Coating	1.34	11.18	1.34	11.18

Surface coaters that reduce emissions by using a capture system and add-on control device (e.g., thermal and catalytic oxidizers, select solvent recovery systems, condensers) must also comply with MACT *operating limits*. These limits are site-specific parameter limits determined during the initial performance test of the system (§63.4492).

Additional Recordkeeping Requirements

The MACT includes notification, recordkeeping, and reporting requirements as summarized in Table 4. Reports must be submitted to the CDPHE Air Pollution Control Division (APCD), while records must be retained on site and made available to the APCD upon request.

Table 4: Overview of Additional Reporting Requirements (40 CFR Part 63, Subpart PPPP)

REPORT REQUIREMENT	REPORT DESCRIPTION
Initial Notification [§63.4510]	The initial notification notifies the APCD that your facility is subject to the Plastic Parts and Products Surface Coating MACT Standards.
Notification of Intent to Conduct a Performance Test [§63.9(e)]	If your facility is required to conduct a performance test (e.g., those with add-on control equipment), you must submit a notification of intent to conduct a performance test 60 days prior to the test.

Notification of Compliance Status [§63.4510]	You must submit a Notification of Compliance Status form within 30 days after the end of the initial compliance period if you are a new source. This form notifies the APCD that your facility is in compliance with the MACT Standards.
Performance Test Report [§63.4520]	If your facility is required to conduct a performance test (e.g., those with add-on control equipment), you must submit a performance test report within 60 days after completion of the performance test.
Startup, Shutdown, Malfunction Reports [§63.4520]	You must submit the report immediately if there is a startup, shutdown, or malfunction of the control device during the reporting period that is not consistent with the startup, shutdown, and malfunction plan. If actions taken were consistent with the plan, the report must be submitted semi-annually.
Semiannual Compliance Reports [§63.4520]	In addition to the initial compliance period, each affected source must submit semiannual compliance reports. (Each reporting year is divided into two semiannual reporting periods.)
Records [§§63.4530 and 63.4531]	You must maintain records necessary to document compliance with the rule for at least 5 years. There may be additional requirements depending on the compliance option that you choose.

New Source Performance Standards (NSPS)

Surface coaters of plastic parts for business machines may be subject to additional federal requirements (referred to as new source performance standards [NSPS]) provided in 40 CFR Part 60, Subpart TTT.

Is Your Business Affected by Subpart TTT?

An Affected Source is . . . (§60.720)

Each spray booth that was constructed, modified, or reconstructed after January 8, 1986 in which plastic parts for use in the manufacture of business machines receive prime coats, color coats, texture coats, or touch-up coats.

Business Machine means . . . (§60.721)

A device that uses electronic or mechanical methods to process information, perform calculations, print or copy information, or convert sound into electrical impulses for transmission such as: typewriters, electronic computing devices, calculating and accounting machines, telephone and telegraph equipment, office machines, and photocopy machines.

**Applicable device SIC Codes are also provided in §60.721.*

The NSPS for surface coaters of plastic parts for business machines is available for download through the Electronic Code of Federal Regulations at www.gpoaccess.gov/ecfr/index.html (search under Title 40, Volume 6, Part 60, Subpart TTT)

Emission Limits

Surface coaters of plastic parts for business machines subject to the NSPS must demonstrate compliance with the VOC emission limits shown in Table 5 (§60.722):

TYPE OF COATING	KILOGRAM OF VOC/LITER OF COATING (as applied)	POUND OF VOC/GALLON OF COATING (as applied)
Prime and Color coating	≤1.5	≤12.5
Texture and Touch-up coating	≤2.3	≤19.1

Compliance Testing

Affected surface coaters must conduct initial performance tests and must either perform monthly calculations or retain appropriate documentation to demonstrate compliance with the NSPS emission limits. Detailed calculation and documentation procedures are specified in §60.723 of the NSPS.

Additional Recordkeeping Requirements

Subpart TTT includes specific notification, recording, and reporting requirements as summarized in Table 6. Reports must be submitted to the CDPHE APCD, while records must be retained on site and made available to the APCD upon request.

Table 6: Overview of Additional Reporting Requirements (CFR Part 60, Subpart TTT)

REPORT REQUIREMENT	REPORT DESCRIPTION
Notification of Intent to Conduct a Performance Test [§60.8]	If your facility is required to conduct performance test, you must submit a notification of intent to conduct a performance test 30 days prior to the test.
Initial Performance Test Report [§60.724.a]	If your facility is required to conduct a performance test, you must submit an Initial Performance Test Report. The requirements of the report are specified in §60.724, and include performance test results, a list of coatings and coating content used during a one-month period, and incineration system data.
Quarterly Non Compliance Report [§60.724.b]	This quarterly report identifies instances in which the VOC limit is exceeded at the facility. If no such exceedances occur, a report stating this must be submitted semiannually.
Records [§60.724.d and §60.724.e]	Your must maintain records necessary to document compliance with the rule for at least 2 years. Additional recordkeeping requirements are provided depending on the compliance option that you choose.

Small Business Assistance Contacts

The CDPHE Small Business Assistance Program (SBAP) and Generator Assistance Program (GAP) provide free services to small businesses seeking help in understanding and complying with environmental regulations. If you have questions on environmental requirements for your surface coating operation, visit our web-sites or call us at:

SBAP: 303.692.3175 or 303.692.3148

www.cdphe.state.co.us/ap/sbap.asp

GAP: 303.692.3415

www.cdphe.state.co.us/hm/gap/gaphom.asp