

Air Toxics Workshop 2003
Coatings and Consumer Products Group NESHAP Overlap Provisions

Promulgated Surface Coating NESHAPs	Potential Coatings Overlap	Overlap Provisions
<p>Metal Furniture: Subpart: RRRR Proposal: 67 FR 20206, 4/24/02 Promulgation: Signed 2/18/03 Rule and Implementation Page: www.epa.gov/ttn/atw/mfurn/mfumrpg.html</p>	<p>Miscellaneous Metal Parts and Products; Plastic Parts and Products; Wood Furniture</p>	<p>The Metal Furniture NESHAP will not apply to surface coating of metal components of wood furniture conducted in an operation that is subject to the Wood Furniture Manufacturing NESHAP. It also does not apply if the parts coated have wider use beyond metal furniture such as small items: knobs, hinges, or screws that have a wider use beyond metal furniture are coated in a non- metal furniture facility.</p> <p><u>SUBPART RRRR RULE LANGUAGE:</u></p> <p><i>(c) This subpart does not apply to surface coating that meets any of the criteria of paragraphs (c)(1) through (6) of this section.</i></p> <p><i>(2) Surface coating of metal components of wood furniture conducted in an operation that is subject to the wood furniture manufacturing NESHAP in subpart JJ of this part.</i></p> <p><i>(4) Surface coating of only small items such as knobs, hinges, or screws that have a wider use beyond metal furniture are not subject to this subpart unless the surface coating occurs at an affected metal furniture source.</i></p> <p><i>(5) Surface coating of metal furniture conducted for the purpose of repairing or maintaining metal furniture used by a major source and not for commerce is not subject to this subpart, unless organic HAP emissions from the surface coating itself are as high as the rates specified in paragraph (b) of this section.</i></p> <p><i>(6) Surface coating of metal furniture performed on-site at installations owned or operated by the Armed Forces of the United States (including the Coast Guard and the National Guard of any State).</i></p>
<p>Paper & Other Web: Subpart: JJJJ Proposal: 65 FR 55332, 9/13/00 Promulgation: 67 FR 72330, 12/4/02 Rule and Implementation Page: www.epa.gov/ttn/atw/powc/powcpg.html</p>	<p>Metal Coil; Printing, Coating and Dyeing of Fabric and Other Textiles; Printing and Publishing</p>	<p>Paper and other web does not affect: any web coating line that is standalone coating equipment or as a product and packaging rotogravure or wide-web flexographic press; any web coating line subject to magnetic tape manufacturing operations; any web coating line that will be subject to metal coil; any web coating line that will be subject to the NESHAP for the printing, coating, and dyeing of fabric and other textiles including any web coating line that coats both a paper or other web substrate and a fabric or other textile substrate, except for a fabric substrate used for pressure sensitive tape and abrasive materials. Web coating lines engaged in the coating of metal webs that are used in flexible packaging are part of the Paper and Other Web source category.</p> <p><u>SUBPART JJJJ RULE LANGUAGE:</u></p> <p><i>Web coating lines specified in paragraphs (a) through (g) of this section are not part of the affected source of this subpart.</i></p> <p><i>(a) Any web coating line that is standalone coating equipment under subpart KK of this part (national emission standards for the printing and publishing industry) which the owner or operator includes in the affected source under subpart KK.</i></p> <p><i>(b) Any web coating line that is a product and packaging rotogravure or wide-web flexographic press under subpart KK of this part (national emission standards for the printing and publishing industry) which is included in the affected source under subpart KK.</i></p> <p><i>(c) Web coating in lithography, screenprinting, letterpress, and narrowweb flexographic printing processes.</i></p> <p><i>(d) Any web coating line subject to subpart EE of this part (national emission standards for magnetic tape manufacturing operations).</i></p> <p><i>(e) Any web coating line that will be subject to the national emission standards for hazardous air pollutants (NESHAP) for surface coating of metal coil currently under development.</i></p> <p><i>(f) Any web coating line that will be subject to the NESHAP for the printing, coating, and dyeing of fabric and other textiles currently under development. This would include any web coating line that coats both a paper or other web substrate and a fabric or other textile substrate, except for a fabric substrate used for pressure sensitive tape and abrasive materials.</i></p>

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<p>Aerospace Manufacturing Rework and Repair Subpart: GG Proposal: 59 FR 29216, 6/6/94 Promulgation: 60 FR 45948, 9/1/95 Rule and Implementation Page: www.epa.gov/ttn/atw/aerosp/aeropg.html</p>	<p>Military/Land Systems, Miscellaneous Metal Parts and Products; Plastic Parts and Products</p>	
<p>Large Appliances: Subpart: NNNN Proposal: 65 FR 81134, 12/22/00 Promulgation: 67 FR 48254, 7/23/02 Rule and Implementation Page: www.epa.gov/ttn/atw/lapp/lapplpg.html</p>	<p>Miscellaneous Metal Parts and Products; Plastic Parts and Products</p>	<p>The surface coating of large appliance parts such as metal or plastic handles, hinges, or fasteners that have a wider use are not subject but would instead be subject to Miscellaneous Metal Parts, Plastic Parts and Products. The source may also comply with the most stringent applicable NESHAP. <u>SUBPART NNNN RULE LANGUAGE:</u> <i>(d) This subpart does not apply to surface coating that meets any of the criteria of paragraphs (d)(1) through (5) of this section.</i> <i>(1) The surface coating of large appliance parts such as metal or plastic handles, hinges, or fasteners that have a wider use beyond large appliances is not subject to this subpart.</i> <i>(2) The surface coating of large appliances conducted for the purpose of repairing or maintaining large appliances used by a facility and not for commerce is not subject to this subpart unless organic HAP emissions from the surface coating itself are as high as the rates specified in paragraph (a) of this section.</i> <i>(3) The surface coating of heat transfer coils or large commercial and industrial chillers.</i></p>
<p>Magnetic Tape Manufacturing Subpart EE Proposal: 59 FR 11662, 3/11/94 Promulgation: 59 FR 64596, 12/15/94 Rule and Implementation Page: www.epa.gov/ttn/atw/magtape/magtappg.html</p>	<p>Paper and Other Web</p>	

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<p>Wood Building Products: Subpart: QQQQ Proposal: 67 FR 42400, 6/21/02 Promulgation: Signed 2/13/03 Rule and Implementation Page: www.epa.gov/ttn/atw/wbldg/wbldgpgp.html Tool Development Plan: www.epa.gov/ttn/atw/wbldg/wbldgplan.html</p>	<p>Wood Furniture; Miscellaneous Metal Parts and Products; Plastic Parts and Products</p>	<p>If you have an affected source that could be subject to the Wood Building Products surface coating NESHAP and other surface coating NESHAPs and one of the surface coating operations account for at least 95 percent of the total (annual) coating usage at the source, you have the option of complying with the requirements of that predominant coating rule (including all applicable emissions limitations, operating limits, and work practice requirements) for all coating operations that would be subject to a NESHAP.</p> <p><u>SUBPART QQQQ RULE LANGUAGE:</u></p> <p><i>(c) This subpart does not apply to surface coating and other operations that meet the criteria of paragraphs (c)(1) through (5) of this section.</i></p> <p><i>(2) Surface coating of wood furniture subject to subpart JJ of this part, including finishing, gluing, cleaning, and washoff operations associated with the production of wood furniture or wood furniture components. The surface coating of millwork and trim associated with cabinet manufacturing is also subject to subpart JJ of this part and not to this subpart.</i></p>
<p>Wood Furniture Manufacturing Subpart: JJ Proposal: 59 FR 62652, 12/6/94 Promulgation: 60 FR 62930, 60 FR 62930 Rule and Implementation Page: www.epa.gov/ttn/atw/wood/riwood.html</p>	<p>Metal Furniture; Wood Building Products</p>	

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Printing and Publishing Subpart: KK Proposal: 60 FR 13664, 3/14/95 Promulgation: 61 FR 27132, 5/30/96 Rule and Implementation Page: www.epa.gov/ttn/atw/print/printpg.html	Paper and Other Web	
Printing, Coating and Dyeing of Fabric and Other Textiles: Subpart: OOOO Proposal: 67 FR 46028, 7/11/02 Promulgation: Signed 2/28/03 Rule and Implementation Page: www.epa.gov/ttn/atw/fabric/fabricpg.html Tool Development Plan: www.epa.gov/ttn/atw/fabric/fabricplan.html	Paper and Other Web Coatings; Metal Coil	<p>Any web coating line that coats both fabric and other textiles, and another substrate such as paper, must comply with the predominant activity conducted on the affected source. Predominant activity is 90 percent of the mass of substrate coated during the compliance period. (For example, a web coating line that coats 90 percent or more of a paper substrate, and 10 percent or less of a fabric or other textile substrate, would be subject to 40 CFR 63, subpart JJJJ.)</p> <p>Web coating lines that apply coatings to both tire cord and to textile cord used in the production of belts and hoses are part of Tire Manufacturing: <u>SUBPART OOOO RULE LANGUAGE:</u> <i>(c) This subpart does not apply to coating, printing, slashing, dyeing, or finishing operations that meet any of the criteria of paragraphs (c)(1) through (5) of this section.</i> <i>(5) Coating, printing, slashing, dyeing, or finishing operations performed on-site at installations owned or operated by the Armed Forces of the United States (including the Coast Guard and the National Guard of any State).</i> <i>(d) Web coating lines specified in paragraphs (d)(1) through (3) of this section are not part of the affected source of this subpart.</i> <i>(1) Any web coating operation that is part of the affected source of subpart JJJJ of this part (national emission standards for hazardous air pollutants for paper and other web coating). This would include any web coating line that coats both a paper and other web substrate and a fabric or other textile substrate for use in flexible packaging, pressure sensitive tape and abrasive materials, or any web coating line laminating a fabric substrate to paper.</i> <i>(e) Any web coating line that coats both fabric and other textiles, and another substrate such as paper, must comply with the subpart of this part that applies to the predominant activity conducted on the affected source. Predominant activity for this subpart is 90 percent of the mass of substrate coated during the compliance period. (For example, a web coating line that coats 90 percent or more of a paper substrate, and 10 percent or less of a fabric or other textile substrate, would be subject to 40 CFR 63, subpart JJJJ.)</i></p>
Shipbuilding and Ship Repair Subpart: II Proposal: 59 FR 62681, 12/6/94 Promulgation: 60 FR 64330, 12/15/95 Rule and Implementation Page: www.epa.gov/ttn/atw/shipb/shipbpg.html	Military/Land Systems; Miscellaneous Metal Parts and Products	

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<p>Metal Coil: Subpart: SSSS Proposed: 65 FR 44616, 7/18/00 Promulgation: 67 FR 39794, 6/10/02 Rule and Implementation Page: www.epa.gov/ttn/atw/mcoil/mcoilpg.htm 1</p>	<p>Paper and Other Web</p>	<p>The metal coil surface coating NESHAP does not apply to any coil coating lines on which at least 85 percent of the metal coil coated, based on surface area, is less than 0.15 millimeter (0.006 inch) thick. These lines are considered paper and other web coating lines, and are covered under the paper and other web NESHAP. The exceptions to this provision are:</p> <ul style="list-style-type: none"> • Despite meeting the criteria you choose to comply with the metal coil surface coating NESHAP; • You operate a paper and other web coating line controlled by the same control device as a line subject to the metal coil surface coating NESHAP and choose to comply with the metal coil surface coating NESHAP for both coating lines; • If you use the 85 percent cutoff provision and at any point coat less than 85 percent paper and other web substrate; You are subject to the metal coil surface coating NESHAP and not subject to the paper and other web NESHAP. <p><u>SUBPART SSSS RULE LANGUAGE:</u></p> <p><i>(b) This subpart does not apply to any coil coating line that meets the criteria of paragraph (b)(1) or (2) of this section.</i></p> <p><i>(1) A coil coating line that is part of research or laboratory equipment.</i></p> <p><i>(2) A coil coating line on which at least 85 percent of the metal coil coated, based on surface area, is less than 0.15 millimeter (0.006 inch) thick, except as provided in paragraph (c) of this section.</i></p> <p><i>(c) If you operate a coating line subject to subpart JJJJ of this part that also meets the criteria in either paragraph (c)(1) or (2) of this section, and you choose to comply with the requirements of this subpart, then such compliance constitutes compliance with subpart JJJJ. The coating line for which you choose this option is, therefore, included in the affected source for this subpart as defined in § 63.5110 and shall not be included in the affected source for subpart JJJJ as defined in § 63.3300.</i></p> <p><i>(1) The coating line is used to coat metal coil of thicknesses both less than and greater than or equal to 0.15 millimeter (0.006 inch) thick, regardless of the percentage of surface area of each thickness coated.</i></p> <p><i>(2) The coating line is used to coat only metal coil that is less than 0.15 millimeter (0.006 inch) thick and the coating line is controlled by a common control device that also receives organic HAP emissions from a coil coating line that is subject to the requirements of this subpart.</i></p> <p><i>(d) Each coil coating line that does not comply with the provisions of this subpart because it meets the criteria in paragraph (b)(2) of this section, that for any rolling 12-month period fails to meet the criteria in paragraph (b)(2) would from that point forward become subject to the provisions of this subpart. After becoming subject to the provisions of this subpart, the coil coating line would no longer be eligible to use the criteria of paragraph (b)(2) of this section, even if in subsequent 12-month periods at least 85 percent of the metal coil coated, based on surface area, is less than 0.15 millimeter (0.006 inch) thick.</i></p>

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Proposed/To Be Proposed Surface Coating NESHAPs	Potential Coatings Overlap	Overlap Provisions
<p>Auto & Light Duty Truck: Subpart: IIII Proposal: 68 FR 78612, 12/24/02 Promulgation: Expected February 2004 www.epa.gov/ttn/atw/auto/autopg.html</p>	<p>Miscellaneous Metal Parts and Products; Plastic Parts and Products</p>	<p>Proposal included no language to address potential overlap.</p>
<p>Metal Can: Subpart: KKKK Proposal: 68 FR 2110, 1/15/03 Promulgation: August 2003 Rule and Implementation Page: www.epa.gov/ttn/atw/mcan/mcanpg.html</p>	<p>None</p>	
<p>Misc. Metal Parts: Subpart: MMMM Proposal: 67 FR 52780, 8/13/02 Promulgation: Expected August 2003 timeframe Rule and Implementation Page: www.epa.gov/ttn/atw/misc/miscpg.html</p>	<p>Auto and Light Duty Truck; Large Appliances; Metal Furniture; Plastic Parts and Products;; Wood Building Products;</p>	<p>Potential Provisions Include: Most Stringent MACT Predominant Activity Revised Applicability Subcategorization</p>
<p>Plastic Parts: Subpart: PPPP Proposal: 67 FR 72330, 12/4/02 Promulgation: Expected August 2003 timeframe Rule and Implementation Page: www.epa.gov/ttn/atw/plastic/plasticpg.html</p>	<p>Auto and Light Duty Truck; Large Appliances; Metal Furniture; Miscellaneous Metal Parts and Products; Wood Building Products</p>	<p>Potential Provisions Include: Most Stringent MACT Predominant Activity Revised Applicability Subcategorization</p>
<p>Military/Land Systems MACT TBA</p>	<p>Aerospace; Shipbuilding</p>	<p>Potential Provisions Include: Most Stringent MACT Predominant Activity Revised Applicability Subcategorization</p>