BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:	)	
	)	R25-
AMENDMENTS TO 35 ILL. ADM. CODE 219,	)	(Rulemaking-Air)
ORGANIC MATERIAL EMISSION	)	
STANDARDS FOR THE METRO EAST AREA	)	

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   Control Technology Guidelines for Control of Volatile Organic Compound Emissions from Coating Operations at Aerospace Manufacturing and Rework Operations, United States Environmental Protection Agency, Office of Air Quality Planning and Standards, Research Triangle Park, NC, December 1997

9. Incorporated Documents:

   None.

10. Certificate of Service

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NOTICE

TO: Don Brown, Clerk
Illinois Pollution Control Board
60 E. Van Buren St., Suite 630
Chicago, IL 60605
Don.brown@illinois.gov

Division Chief of Environmental Enforcement
Office of the Attorney General
100 West Randolph St., Suite 1200
Chicago, IL 60601
enviro@atg.state.il.us

Office of Legal Services
Illinois Department of Natural Resources
One Natural Resources Way
Springfield, IL 62702-1271
Renee.snow@illinois.gov

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board the RULEMAKING PROPOSAL entitled "AMENDMENTS TO 35 ILL. ADM. CODE 219, ORGANIC MATERIAL EMISSION STANDARDS FOR THE METRO-EAST AREA" AND APPEARANCES and supporting documentation of the Illinois Environmental Protection Agency, a copy of which is herewith served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: /s/ Sarah McKavetz
Sarah McKavetz
Assistant Counsel
Division of Legal Counsel

DATED: June 12, 2025

2520 W Iles Ave.
PO Box 19276
Springfield, IL 62794-9276
217/782-5544

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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STANDARDS FOR THE METRO EAST AREA	)	

APPEARANCE

The undersigned hereby enters her appearance as an attorney on behalf of the Illinois Environmental Protection Agency.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: /s/ Dana Vetterhoffer
Dana Vetterhoffer
Deputy General Counsel
Division of Legal Counsel

DATED: June 12, 2025

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The undersigned hereby enters her appearance as an attorney on behalf of the Illinois Environmental Protection Agency.

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ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: /s/ Sarah McKavetz
Sarah McKavetz
Assistant Counsel
Division of Legal Counsel

DATED: June 12, 2025

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BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

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	)	R25-
AMENDMENTS TO 35 ILL. ADM. CODE 219,	)	(Rulemaking-Air)
ORGANIC MATERIAL EMISSION	)	
STANDARDS FOR THE METRO EAST AREA	)	

CERTIFICATE OF ORIGINATION

The Illinois Environmental Protection Agency certifies in accordance with 35 Ill. Adm. Code 102.202(i) that this proposal for amendments to 35 Ill. Adm. Code 219 amends the most recent version of the rules published on the Illinois Pollution Control Board's website.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: /s/ Sarah McKavetz
Sarah McKavetz
Assistant Counsel
Division of Legal Counsel

DATED: June 12, 2025

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STANDARDS FOR THE METRO EAST AREA	)	

STATEMENT OF REASONS

I. INTRODUCTION

The Illinois Environmental Protection Illinois EPA ("Illinois EPA" or "Agency") submits this Statement of Reasons to the Illinois Pollution Control Board ("Board") pursuant to Sections 27 and 28 of the Environmental Protection Act ("Act") (415 ILCS 5/27 and 28) and 35 Ill. Adm. Code 102.202 in support of the attached proposal to amend regulations. These regulations are proposed to address an inadvertent omission by the Illinois EPA in the previously adopted rulemaking amendments to 35 Ill. Adm. Code 219, Organic Material Emission Standards for the Metro East Area, and 35 Ill. Adm. Code 211, Definitions and General Provisions, R21-18 ("Aerospace Rulemaking"). The Illinois EPA proposed the Aerospace Rulemaking to control emissions of volatile organic materials ("VOM")[1] at aerospace manufacturing and rework operations located in the counties of Madison, Monroe, and St. Clair ("Metro-East area"). The Board adopted the amendments on March 4, 2021, and the United States Environmental Protection Illinois EPA ("USEPA") approved the final rule as revisions to Illinois' State Implementation Plan ("SIP") on April 11, 2023. *See* 88 FR 21490.

The Aerospace Rulemaking included a limited exemption for specialty coatings but omitted a similar exemption for primers, topcoats, and chemical milling maskants in volumes of less than 50 gallons per year, subject to a maximum exemption of 200 gallons total for such

[1] As the Illinois EPA explained in the Aerospace Rulemaking, VOM are effectively the same as volatile organic compounds ("VOC").

formulations applied annually. Both exemptions were included in the USEPA's 1997 control techniques guideline ("CTG"), *Control of Volatile Organic Compound Emissions from Coating Operations at Aerospace Manufacturing and Rework Operations,* EPA-453/R-97-004. The proposed rulemaking is intended to correct the Agency's inadvertent omission and make Illinois' aerospace standards for the Metro-East area consistent with the CTG.

II. STATEMENT OF FACTS

This rulemaking proposes to amend the aerospace coatings regulations to be consistent with USEPA's CTG.

A. Aerospace Manufacturing and Rework Operations

In December 1997, the USEPA issued the CTG for coating operations and cleaning solvent use at aerospace manufacturing and rework facilities. The CTG recommends reasonably available control technology ("RACT") control measures and applicability thresholds for sources in the category. While states were required to submit VOM regulations constituting RACT for major aerospace manufacturing and rework operations in ozone nonattainment areas classified as moderate and above pursuant to Section 182 of the Clean Air Act, Illinois did not adopt rules at the time because the Illinois EPA determined that there were no sources that would have been subject to the requirements.

In 2020, however, the Illinois EPA proposed the Aerospace Rulemaking following a communication from a source located in the Metro-East area that intended to expand its operations such that it would be subject to the VOM RACT rules in 35 Ill. Adm. Code § 219.204 for VOM emissions from coating and cleaning operations. Without rules specific to aerospace facilities, the source would have potentially been subject to more general regulations for miscellaneous metal parts and products coatings, which the Illinois EPA agreed were not appropriate for aerospace coating operations. The CTG includes two exclusions for low-volume

coatings. One, in Section 4.1, addresses specialty coatings and exempts "[f]acilities that use separate formulations in volumes of less than 50 gallons per year, subject to a maximum exemption of 200 gallons for all such formulations applied annually." *See* CTG at p. 4-3. The other, in Section 4.2, states that the "requirements do not apply to facilities that use separate formulations of primers, topcoats, and chemical milling maskants (Type I/II) in volumes of less than 50 gallons per year, subject to a maximum exemption of 200 gallons total for such formulations applied annually." *See* CTG at p. 4-4. The Illinois EPA's Aerospace Rulemaking proposal and the final rule adopted by the Board included the Section 4.1 exemption for specialty coatings but inadvertently omitted the CTG's Section 4.2 exemption for primers, topcoats and chemical milling maskants. The Agency agrees that the CTG provides that the exemption should apply to these coating applications.

B. National Emissions Standards for Hazardous Air Pollutants

The National Emission Standards for Hazardous Air Pollutants ("NESHAP") for aerospace manufacturing and rework facilities reinforces that the exemption is intended to apply to both categories of coatings and provides clarity that the exemption applies to each separate formulation. 40 CFR 63.741(g) states:

> The requirements for primers, topcoats, specialty coatings, and chemical milling maskants in §§ 63.745 and 63.747 do not apply to the use of low-volume coatings in these categories for which the annual total of each separate formulation used at a facility does not exceed 189 l (50 gal), and the combined annual total of all such primers, topcoats, specialty coatings, and chemical milling maskants used at a facility does not exceed 757 l (200 gal).

The language as it currently exists leaves aerospace manufacturing and rework facilities in the Metro-East area vulnerable to exceedances of low-volume primer, topcoat and chemical milling maskant limits, which was not intended by the Illinois EPA, the 1997 CTG, or the NESHAP.

C. SIP Submittal

This proposal is intended to be submitted to USEPA as a revision to the Illinois SIP. SIP revisions are required to undergo 30-day public notice and opportunity for hearing before they may be submitted to USEPA for approval pursuant to 40 CFR § 51.102 and Appendix V, 2.1(g). The Board's procedural rules provide for notice that meets this requirement, as set forth at 35 Ill. Adm. Code 102.416. The notice, to be sufficient, must describe the revisions, in this case the amendments to Part 219, and indicate that the adopted rule will be submitted to USEPA as a SIP revision.

The Illinois EPA therefore requests that the Board include the following or similar language in its notice of hearing regarding this rulemaking:

> If adopted by the Board, the Illinois EPA will submit the proposed amendments to 35 Ill. Adm. Code Part 219 to the United States Environmental Protection Agency ("USEPA") for review and approval as a revision to Illinois' ozone State Implementation Plan ("SIP"). The revisions submitted to USEPA will include an analysis demonstrating that the proposal does not interfere with attainment or maintenance of any applicable National Ambient Air Quality Standard, reasonable further progress, or any other applicable requirement of the Clean Air Act ("CAA"). This notice is intended to satisfy the requirements of Section 110(l) of the CAA, 42 U.S.C. § 7410(l) (public notice for SIP revisions).

The Illinois EPA is not aware of any objection from USEPA Region V to the current proposal.

III. PURPOSE AND EFFECT OF THE PROPOSAL

This rulemaking proposal is designed to amend the aerospace coating regulations to exempt low-volume coatings for primers, topcoats and chemical milling maskants in volumes of less than 50 gallons per year, subject to a maximum exemption of 200 gallons total for such formulations applied annually, consistent with the CTG. Because the proposed revision expands the categories of exempt coatings but does not change the existing 200 gallon limit per year for exempted coatings, the proposal would likely result in little to no increase in emissions beyond the existing rule.

Currently, there are three sources in the Metro-East area to which the proposal applies. Given the limited reach of the current proposal, adoption of the proposed rule is not expected to result in either significant emission reductions or increases.

IV. GEOGRAPHIC REGIONS AND SOURCES AFFECTED

The geographic region subject to the proposed regulations is the Metro-East area, which for purposes of this rulemaking consists of Madison, Monroe, and St. Clair Counties.

The proposed rule will apply to aerospace manufacturing and rework operations that include the manufacture or rework of commercial, civil, or military aerospace vehicles or components at sources located in the Metro-East area that have a potential to emit 25 tons per year or more of VOM. The following three sources in the Metro-East area would potentially be affected by the proposed regulations: Gulfstream Aerospace Services Corp. in Cahokia, Premiere Air Center Inc. in East Alton, and Boeing in Mascoutah. The Agency is not aware of additional sources in the Metro-East area that may be affected by this proposal.

V. TECHNICAL FEASIBILITY AND ECONOMIC REASONABLENESS

Given the limited scope of this proposal, the Illinois EPA has concluded that compliance is both technically feasible and economically reasonable. It is not anticipated that this proposal will result in additional costs to affected sources. A more detailed discussion is set forth in the *Technical Support Document for Control of VOM from Aerospace Coating and Solvent Use, June 2025 ("2025 TSD")*, and supporting documentation. *See* 2025 TSD.

VI. COMMUNICATION WITH INTERESTED PARTIES

The Illinois EPA did not engage in public outreach on this proposal, but did consult with one of the potentially impacted sources in the Metro-East area, Gulfstream Aerospace Services Corp.

VII. SYNOPSIS OF TESTIMONY AND REQUEST FOR HEARINGS BY VIDEOCONFERENCE

The Illinois EPA plans to call Rory Davis, Regulatory Development Unit Manager, Air Quality Planning Section, Bureau of Air, Illinois EPA as a witness at hearing. In the event Mr. Davis is unavailable, the Illinois EPA may call either Guosen Chen or Amanda Williams, Air Quality Planning Section, Bureau of Air, as a witness in his stead. The Agency's witness will testify regarding the proposed amendments and will answer questions. Written testimony will be submitted prior to hearing in accordance with the Board's procedural rules. The Agency is unavailable for hearing on the following dates: August 4-8 and 12-25, September 2, October 8-20, November 10-12 and 24-28, and December 22-26, 2025.

In addition, Section 102.114 of the Board's procedural rules states, "Hearings will be conducted under 35 Ill. Adm. Code 101.Subpart F, including any hearing held by videoconference (see 35 Ill. Adm. Code 101.600(b))." 35 Ill. Adm. Code 102.114. Section 101.600(a) states, in part, "The hearings will be held at locations ordered by the hearing officer. The hearing officer will select hearing locations that comply with any geographic requirements imposed by applicable law and, to the extent feasible, promote the attendance of interested members of the public, the convenience of the parties, and the conservation of the Board's resources." 35 Ill. Adm. Code 101.600(a).

Furthermore, Section 101.600(b) states, "Any Board hearing may be held by videoconference. Upon its own motion or the motion of any party, the Board or the hearing officer may order that a hearing be held by videoconference. In deciding whether a hearing should be held by videoconference, factors that the Board or the hearing officer will consider include cost-effectiveness, efficiency, facility accommodations, witness availability, public interest, the parties' preferences, and the proceeding's complexity and contentiousness." 35 Ill.

Adm. Code 101.600(b). As such, to minimize expenses and conserve State resources, and because little public interest is anticipated, the Illinois EPA respectfully requests that the hearings under this rulemaking proposal be held by videoconference.

VIII. CONCLUSION

For the reasons stated above, the Illinois EPA hereby submits this regulatory proposal and requests the Board to adopt these rules for the State of Illinois.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: /s/ Sarah McKavetz
Sarah McKavetz
Assistant Counsel
Division of Legal Counsel

DATED: June 12, 2025

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TITLE 35: ENVIRONMENTAL PROTECTION
SUBTITLE B: AIR POLLUTION
CHAPTER I: POLLUTION CONTROL BOARD
SUBCHAPTER c: EMISSIONS STANDARDS AND LIMITATIONS FOR STATIONARY SOURCES

PART 219
ORGANIC MATERIAL EMISSION STANDARDS AND LIMITATIONS FOR THE METRO EAST AREA

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219.APPENDIX H	Baseline VOM Content Limitations for Subpart F, Section 219.212 Cross-Line Averaging

AUTHORITY: Implementing Section 10 and authorized by Sections 27, 28 and 28.5 of the Environmental Protection Act [415 ILCS 5/10, 27, 28 and 28.5].

SOURCE: Adopted in R91-8 at 15 Ill. Reg. 12491, effective August 16, 1991; amended in R91-24 at 16 Ill. Reg. 13597, effective August 24, 1992; amended in R91-30 at 16 Ill. Reg. 13883, effective August 24, 1992; emergency amendment in R93-12 at 17 Ill. Reg. 8295, effective May 24, 1993, for a maximum of 150 days; amended in R93-9 at 17 Ill. Reg. 16918, effective September 27, 1993 and October 21, 1993; amended in R93-28 at 18 Ill. Reg. 4242, effective March 3, 1994; amended in R94-12 at 18 Ill. Reg. 14987, effective September 21, 1994; amended in R94-15 at 18 Ill. Reg. 16415, effective October 25, 1994; amended in R94-16 at 18 Ill. Reg. 16980, effective November 15, 1994; emergency amendment in R95-10 at 19 Ill. Reg. 3059, effective February 28, 1995, for a maximum of 150 days; amended in R94-21, R94-31 and R94-32 at 19 Ill. Reg. 6958, effective May 9, 1995; amended in R94-33 at 19 Ill. Reg. 7385, effective May 22, 1995; amended in R96-2 at 20 Ill. Reg. 3848, effective February 15, 1996; amended in R96-13 at 20 Ill. Reg. 14462, effective October 28, 1996; amended in R97-24 at 21 Ill. Reg. 7721, effective June 9, 1997; amended in R97-31 at 22 Ill. Reg. 3517, effective February 2, 1998; amended in R04-12/20 at 30 Ill. Reg. 9799, effective May 15, 2006; amended in R06-21 at 31 Ill. Reg. 7110, effective April 30, 2007; amended in R10-10 at 34 Ill. Reg. 5392, effective March 23, 2010; amended in R10-8 at 34 Ill. Reg. 9253, effective June 25, 2010; amended in R10-20 at 34 Ill. Reg. 14326, effective September 14, 2010; amended in R10-8(A) at 35 Ill. Reg. 496, effective December 21, 2010; amended in R11-23 at 35 Ill. Reg. 13676, effective July 27, 2011; amended in R11-23(A) at 35 Ill. Reg. 18830, effective October 25, 2011; amended in R12-24 at 37 Ill. Reg. 1722, effective January 28, 2013; amended in R13-18 at 38 Ill. Reg. 1061, effective December 23, 2013; amended in R21-18 at 45 Ill. Reg.3553, effective March 4, 2021; amended at __ Ill. Reg. ___, effective _____.

SUBPART F: COATING OPERATIONS

Section 219.204 Emission Limitations

Except as provided in Sections 219.205, 219.207, 219.208, 219.212, 219.215 and 219.216, an owner or operator of a coating line must not apply at any time any coating in which the VOM content exceeds the following emission limitations for the specified coating. Except as otherwise provided in subsections (a), (c), (g), (h), (j), (l), (n), (o), (q), and (r), compliance with the emission limitations marked with an asterisk in this Section is required on and after March 15, 1996, and compliance with emission limitations not marked with an asterisk is required until March 15, 1996. The following emission limitations are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition. Compliance with this Subpart must

be demonstrated through the applicable coating analysis test methods and procedures specified in Section 219.105(a) and the recordkeeping and reporting requirements specified in Section 219.211(c) except where noted. (Note: The equation presented in Section 219.206 must be used to calculate emission limitations for determining compliance by add-on controls, credits for transfer efficiency, emissions trades and cross-line averaging.) The emission limitations are as follows:

			kg/l	lb/gal
a)	Automobile or Light-Duty Truck Coating			
	1)	Prior to May 1, 2012:		
		A) Prime coat	0.14	(1.2)
			0.14*	(1.2)*
		B) Primer surface coat	1.81	(15.1)
			1.81*	(15.1)*

BOARD NOTE: The primer surface coat limitation is in units of kg (lbs) of VOM per l (gal) of coating solids deposited. Compliance with the limitation must be based on the daily-weighted average from an entire primer surface operation. Compliance must be demonstrated in accordance with the topcoat protocol referenced in Section 219.105(b)(1)(A) and the recordkeeping and reporting requirements specified in Section 219.211(f). Testing to demonstrate compliance must be performed in accordance with the topcoat protocol and a detailed testing proposal approved by the Agency and USEPA specifying the method of demonstrating compliance with the protocol. Section 219.205 does not apply to the primer surface limitation.

		kg/l	lb/gal
C)	Topcoat		
		1.81	(15.1)
		1.81*	(15.1)*

BOARD NOTE: The topcoat limitation is in units of kg (lbs) of VOM per l (gal) of coating solids deposited. Compliance with the limitation must be based on the daily-weighted average from an entire topcoat operation. Compliance must be demonstrated in accordance with the topcoat protocol referenced in Section 219.105(b)(1)(A) and the recordkeeping and reporting requirements specified in Section 219.211(f). Testing to demonstrate compliance must be performed in accordance with the topcoat protocol and a detailed testing proposal approved by the Agency and USEPA specifying the method of demonstrating compliance with the protocol. Section 219.205 does not apply to the topcoat limitation.

		kg/l	lb/gal
D)	Final repair coat		
		0.58	(4.8)
		0.58*	(4.8)*

2) On and after May 1, 2012, subject automobile and light-duty truck coating lines must comply with the following limitations. These limitations must not apply to materials supplied in containers with a net volume of 0.47 liters (16 oz) or less, or a net weight of 0.45 kg (1 lb) or less:

A) Electrodeposition primer (EDP) operations. For purposes of this subsection (a)(2)(A), "electrodeposition" means a water-borne dip coating process in which opposite electrical charges are applied to the substrate and the coating. The coating is attracted to the substrate due to the electrochemical potential difference that is created.

		kg VOM/l coating solids applied	lb VOM/gal coating solids applied
i)	When solids turnover ratio (R_T) is greater than or equal to 0.160	0.084	(0.7)
ii)	When R_T is greater than or equal to 0.040 and less than 0.160	$0.084 \times 350^{0.160-R_T}$	$(0.084 \times 350^{0.160-R_T} \times 8.34)$

B) Primer surfacer operations

		kg VOM/l coating solids deposited	lb VOM/gal coating solids deposited
i)	VOM content limitation	1.44	(12.0)

ii) Compliance with the limitation in subsection (a)(2)(B)(i) must be based on the daily-weighted average from an entire primer surfacer operation. Compliance must be demonstrated in accordance with the topcoat protocol referenced in Section 219.105(b)(1)(B) and the recordkeeping and reporting requirements specified in Section 219.211(f). Testing to demonstrate compliance must be performed in accordance with the topcoat protocol and a detailed testing proposal approved by the Agency and USEPA specifying the method of demonstrating

compliance with the protocol. Section 219.205 does not apply to the primer surfacer limitation.

C) Topcoat operations

		kg VOM/l coating solids deposited	lb VOM/gal coating solids deposited
i)	VOM content limitation	1.44	(12.0)

ii) Compliance with the limitation in subsection (a)(2)(C)(i) must be based on the daily-weighted average from an entire topcoat operation. Compliance must be demonstrated in accordance with the topcoat protocol referenced in Section 219.105(b)(1)(B) and the recordkeeping and reporting requirements specified in Section 219.211(f). Testing to demonstrate compliance must be performed in accordance with the topcoat protocol and a detailed testing proposal approved by the Agency and USEPA specifying the method of demonstrating compliance with the protocol. Section 219.205 does not apply to the topcoat limitation.

D) Combined primer surfacer and topcoat operations

		kg VOM/l coating solids deposited	lb VOM/gal coating solids deposited
i)	VOM content limitation	1.44	(12.0)

ii) Compliance with the limitation in subsection (a)(2)(D)(i) must be based on the daily-weighted average from the combined primer surfacer and topcoat operations. Compliance must be demonstrated in accordance with the topcoat protocol referenced in Section 219.105(b)(1)(B) and the recordkeeping and reporting requirements specified in Section 219.211(f). Testing to demonstrate compliance must be performed in accordance with the topcoat protocol and a detailed testing proposal approved by the Agency and USEPA specifying the method of demonstrating compliance with the protocol. Section 219.205 does not apply to the combined primer surfacer and topcoat limitation.

E) Final repair coat operations

		kg/l coatings	lb/gal coatings
i)	VOM content limitation	0.58	(4.8)

ii) Compliance with the final repair operations limitation in subsection (a)(2)(E)(i) must be on an occurrence-weighted average basis, calculated in accordance with the equation below, in which clear coatings must have a weighting factor of 2 and all other coatings must have a weighting factor of 1. For purposes of this subsection (a)(2)(E)(ii), an "occurrence" is the application of the combination of coatings that constitute a final repair coat for a single automobile or light-duty truck. Section 219.205 does not apply to the final repair coat limitation.

$$VOM_{tot} = \frac{2VOM_{cc} + \sum_{i=1}^{n} VOM_i}{n+2}$$

where:

VOM_{tot} = Total VOM content of all coatings, as applied, on an occurrence weighted average basis, and used to determine compliance with this subsection (a)(2)(E).

i = Subscript denoting a specific coating applied.

n = Total number of coatings applied in the final repair operation, other than clear coatings.

VOM_{cc} = The VOM content, as applied, of the clear coat used in the final repair operation.

VOM_i = The VOM content of each coating used in the final repair operation, as applied, other than clear coatings.

F) Miscellaneous Materials. For reactive adhesives subject to this subsection (a)(2)(F), compliance must be demonstrated in accordance with the methods and procedures set forth in appendix A to Subpart PPPP of 40 CFR 63, incorporated by reference in Section 219.112.

	kg/l	lb/gal

	i)	Glass bonding primer	0.90	(7.51)
	ii)	Adhesive	0.25	2.09)
	iii)	Cavity wax	0.65	(5.42)
	iv)	Trunk sealer	0.65	(5.42)
	v)	Deadener	0.65	(5.42)
	vi)	Gasket/gasket sealing material	0.20	(1.67)
	vii)	Underbody coating	0.65	(5.42)
	viii)	Trunk interior coating	0.65	(5.42)
	ix)	Bedliner	0.20	(1.67)
	x)	Weatherstrip adhesive	0.75	(6.26)
	xi)	Lubricating wax/compound	0.70	(5.84)

					kg/l	lb/gal
b)	Can Coating					
	1)	Sheet basecoat and overvarnish				
		A)	Sheet basecoat		0.34 0.26*	(2.8) (2.2)*
		B)	Overvarnish		0.34 0.34	(2.8) (2.8)*
	2)	Exterior basecoat and overvarnish			0.34 0.25*	(2.8) (2.1)*
	3)	Interior body spray coat				
		A)	Two piece		0.51 0.44*	(4.2) (3.7)*
		B)	Three piece		0.51 0.51*	(4.2) (4.2)*
	4)	Exterior end coat			0.51 0.51*	(4.2) (4.2)*

	5)	Side seam spray coat	0.66 0.66*	(5.5) (5.5)*
	6)	End sealing compound coat	0.44 0.44*	(3.7) (3.7)*
c)	Paper Coating		kg/l	lb/gal
	1)	Prior to May 1, 2011:	0.28	(2.3)
	2)	On and after May 1, 2011:	kg VOM/kg (lb VOM/lb) solids applied	kg VOM/kg (lb VOM/lb) coatings applied
		A) Pressure sensitive tape and label surface coatings	0.20	(0.067)
		B) All other paper coatings	0.40	(0.08)

3) The paper coating limitation in this subsection (c) does not apply to any owner or operator of any paper coating line on which flexographic, rotogravure, lithographic, or letterpress printing is performed if the paper coating line complies with the applicable emissions limitations in Subpart H. In addition, screen printing on paper is not regulated as paper coating, but is regulated under Subpart TT. On and after May 1, 2011, the paper coating limitation also does not apply to coating performed on or in-line with any digital printing press, or to size presses and on-machine coaters on papermaking machines applying sizing or water-based clays.

d)	Coil Coating	kg/l 0.31 0.20*	lb/gal (2.6) (1.7)*
e)	Fabric Coating	0.35 0.28*	(2.9) (2.3)*
f)	Vinyl Coating	0.45 0.28*	(3.8) (2.3)*
g)	Metal Furniture Coating		
	1) Prior to May 1, 2011:	kg/l	lb/gal
	A) Air dried	0.34	(2.8)

	B)	Baked	0.28	(2.3)
2)	On and after May 1, 2011:		kg/l (lb/gal) solids	kg/l (lb/gal) applied
	A)	General, One Component	0.275 (2.3)	0.40 (3.3)
	B)	General, Multi-Component		
		i) Air dried	0.340 (2.8)	0.55 (4.5)
		ii) Baked	0.360 (3.0)	0.61 (5.1)
	C)	Extreme High Gloss		
		i) Air dried	0.340 (2.8)	0.55 (4.5)
		ii) Baked	0.360 (3.0)	0.61 (5.1)
	D)	Extreme Performance		
		i) Air dried	0.420 (3.5)	0.80 (6.7)
		ii) Baked	0.360 (3.0)	0.61 (5.1)
	E)	Heat Resistant		
		i) Air dried	0.420 (3.5)	0.80 (6.7)
		ii) Baked	0.360 (3.0)	0.61 (5.1)
	F)	Metallic	0.420 (3.5)	0.80 (6.7)
	G)	Pretreatment Coatings	0.420	0.80

			(3.5)	(6.7)
	H)	Solar Absorbent		
		i) Air dried	0.420 (3.5)	0.80 (6.7)
		ii) Baked	0.360 (3.0)	0.61 (5.1)

3) On and after May 1, 2011, the limitations in this subsection (g) do not apply to stencil coatings, safety-indicating coatings, solid-film lubricants, electric-insulating and thermal-conducting coatings, touch-up and repair coatings, or coating applications utilizing hand-held aerosol cans.

h) Large Appliance Coating

1)	Prior to May 1, 2011:		kg/l	lb/gal
	A)	Air dried	0.34	(2.8)
	B)	Baked	0.28	(2.3)
2)	On and after May 1, 2011:		kg/l (lb/gal)	kg/l (lb/gal) solids applied
	A)	General, One Component	0.275 (2.3)	0.40 (3.3)
	B)	General, Multi-Component		
		i) Air dried	0.340 (2.8)	0.55 (4.5)
		ii) Baked	0.275 (2.3)	0.40 (3.3)
	C)	Extreme High Gloss		
		i) Air dried	0.340 (2.8)	0.55 (4.5)
		ii) Baked	0.360 (3.0)	0.61 (5.1)
	D)	Extreme Performance		

	i)	Air dried	0.420 (3.5)	0.80 (6.7)
	ii)	Baked	0.360 (3.0)	0.61 (5.1)
E)	Heat Resistant			
	i)	Air dried	0.420 (3.5)	0.80 (6.7)
	ii)	Baked	0.360 (3.0)	0.61 (5.1)
F)	Metallic		0.420 (3.5)	0.80 (6.7)
G)	Pretreatment Coatings		0.420 (3.5)	0.80 (6.7)
H)	Solar Absorbent			
	i)	Air dried	0.420 (3.5)	0.80 (6.7)
	ii)	Baked	0.360	0.61

3) The limitations in this subsection (h) do not apply to the use of quick-drying lacquers for repair of scratches and nicks that occur during assembly, provided that the volume of coating does not exceed 0.95 1 (1 quart) in any one rolling eight-hour period. On and after May 1, 2011, these limitations also do not apply to stencil coatings, safety-indicating coatings, solid-film lubricants, electric-insulating and thermal-conducting coatings, touch-up and repair coatings, or coating applications utilizing hand-held aerosol cans.

		kg/l	lb/gal
i)	Magnet Wire Coating	0.20 0.20*	(1.7) (1.7)*
j)	Prior to May 1, 2012: Miscellaneous Metal Parts and Products Coating		
	1) Clear coating	0.52 0.52*	(4.3) (4.3)*

2)	Extreme performance coating			
	A)	Air dried	0.42 0.42*	(3.5) (3.5)*
	B)	Baked	0.42 0.40*	(3.5) (3.3)*
3)	Steel pail and drum interior coating		0.52 0.52*	(4.3) (4.3)*
4)	All other coatings			
	A)	Air dried	0.42 0.40*	(3.5) (3.3)*
	B)	Baked	0.36 0.34*	(3.0) (2.8)*
5)	Metallic Coating			
	A)	Air dried	0.42 0.42*	(3.5) (3.5)*
	B)	Baked	0.36 0.36	(3.0) (3.0)*

6) For purposes of subsection (j)(5), "metallic coating" means a coating which contains more than ¼ lb/gal of metal particles, as applied.

BOARD NOTE: On and after May 1, 2012, the limitations in Section 219.204(q) apply to this category of coating.

k)	Heavy Off-Highway Vehicle Products Coating		kg/l	lb/gal
1)	Extreme performance prime coat		0.42 0.42*	(3.5) (3.5)*
2)	Extreme performance topcoat (air dried)		0.42 0.42*	(3.5) (3.5)*
3)	Final repair coat (air dried)		0.42 0.42*	(3.5) (3.5)*

4) All other coatings are subject to the emission limitations for miscellaneous

metal parts and products coatings in subsection (j).

l) Wood Furniture Coating

1) Limitations before March 15, 1998:

		kg/l	lb/gal
A)	Clear topcoat	0.67	(5.6)
B)	Opaque stain	0.56	(4.7)
C)	Pigmented coat	0.60	(5.0)
D)	Repair coat	0.67	(5.6)
E)	Sealer	0.67	(5.6)
F)	Semi-transparent stain	0.79	(6.6)
G)	Wash coat	0.73	(6.1)

BOARD NOTE: Prior to March 15, 1998, an owner or operator of a wood furniture coating operation subject to this Section must apply all coatings, with the exception of no more than 37.8 l (10 gal) of coating per day used for touch-up and repair operations, using one or more of the following application systems: airless spray application system, air-assisted airless spray application system, electrostatic spray application system, electrostatic bell or disc spray application system, heated airless spray application system, roller coating, brush or wipe coating application system, dip coating application system or high volume low pressure (HVLP) application system.)

2) On and after March 15, 1998, wood furniture sealers and topcoats must comply with one of the limitations specified in subsections (l)(2)(A) through (E):

			kg VOM/kg solids	lb VOM/lb solids
A)	Topcoat		0.8	(0.8)
B)	Sealers and topcoats with the following limits:			
	i)	Sealer other than acid-cured alkyd amino vinyl sealer	1.9	(1.9)

ii)	Topcoat other than acid-cured alkyd amino conversion varnish topcoat	1.8	(1.8)
iii)	Acid-cured alkyd amino vinyl sealer	2.3	(2.3)
iv)	Acid-cured alkyd amino conversion varnish topcoat	2.0	(2.0)

C) Meet the provisions of Section 219.215 for use of an averaging approach;

D) Achieve a reduction in emissions equivalent to the requirements of subsection (l)(2)(A) or (B), as calculated using Section 219.216; or

E) Use a combination of the methods specified in subsections (l)(2)(A) through (D).

3) Other wood furniture coating limitations on and after March 15, 1998:

		kg/l	lb/gal
A)	Opaque stain	0.56	(4.7)
B)	Non-topcoat pigmented coat	0.60	(5.0)
C)	Repair coat	0.67	(5.6)
D)	Semi-transparent stain	0.79	(6.6)
E)	Wash coat	0.73	(6.1)

4) Other wood furniture coating requirements on and after March 15, 1998:

A) A source subject to the limitations of subsection (l), (2) or (3) and utilizing one or more wood furniture coating spray booths must not use strippable spray booth coatings containing more than 0.8 kg VOM/kg solids (0.8 lb VOM/lb solids), as applied.

B) Any source subject to the limitations of subsection (l), (2) or (3) must comply with Section 219.217.

C) Any source subject to the limitations of subsection (l)(2)(A) or (B) and utilizing one or more continuous coaters, must for each continuous coater, use an initial coating which complies with the limitations of subsection (l)(2)(A) or (B). The viscosity of the coating in each reservoir must always be greater than or equal to the viscosity of the initial coating in the reservoir. The owner or operator must:

i) Monitor the viscosity of the coating in the reservoir with a viscosity meter or by testing the viscosity of the initial coating and retesting the coating in the reservoir each time solvent is added;

ii) Collect and record the reservoir viscosity and the amount and weight of VOM per weight of solids of coating and solvent each time coating or solvent is added; and

iii) Maintain these records at the source for a period of three years.

m)	Prior to May 1, 2012: Plastic Parts Coating: Automotive/Transportation		kg/l	lb/gal
	1)	Interiors		
		A) Baked		
		i) Color coat	0.49*	(4.1)*
		ii) Primer	0.46*	(3.8)*
		B) Air dried		
		i) Color coat	0.38*	(3.2)*
		ii) Primer	0.42*	(3.5)*
	2)	Exteriors (flexible and non-flexible)		
		A) Baked		
		i) Primer	0.60*	(5.0)*
		ii) Primer non-flexible	0.54*	(4.5)*
		iii) Clear coat	0.52*	(4.3)*

		iv) Color coat	0.55*	(4.6)*
	B)	Air dried		
		i) Primer	0.66*	(5.5)*
		ii) Clear coat	0.54*	(4.5)*
		iii) Color coat (red & black)	0.67*	(5.6)*
		iv) Color coat (others)	0.61*	(5.1)*
3)	Specialty			
	A)	Vacuum metallizing basecoats, texture basecoats	0.66*	(5.5)*
	B)	Black coatings, reflective argent coatings, air bag cover coatings, and soft coatings	0.71*	(5.9)*
	C)	Gloss reducers, vacuum metallizing topcoats, and texture topcoats	0.77*	(6.4)*
	D)	Stencil coatings, adhesion primers, ink pad coatings, electrostatic prep coatings, and resist coatings	0.82*	(6.8)*
	E)	Head lamp lens coatings	0.89*	(7.4)*

BOARD NOTE: On and after May 1, 2012, the limitations in Section 219.204(q) apply to this category of coating.

n)	Prior to May 1, 2012: Plastic Parts Coating: Business Machine		kg/l	lb/gal
1)	Primer		0.14*	(1.2)*
2)	Color coat (non-texture coat)		0.28*	(2.3)*
3)	Color coat (texture coat)		0.28*	(2.3)*
4)	Electromagnetic interference/radio frequency interference (EMI/RFI) shielding coatings		0.48*	(4.0)*

5)	Specialty Coatings			
	A)	Soft coat	0.52*	(4.3)*
	B)	Plating resist	0.71*	(5.9)*
	C)	Plating sensitizer	0.85*	(7.1)*

BOARD NOTE: On and after May 1, 2012, the limitations in Section 219.204(q) apply to this category of coating.

o) Flat Wood Paneling Coatings. On and after August 1, 2010, flat wood paneling coatings must comply with one of the following limitations:

1) 0.25 kg VOM/l of coatings (2.1 lb VOM/gal coatings); or

2) 0.35 kg VOM/l solids (2.9 lb VOM/gal solids).

BOARD NOTE: The Board has omitted subsection (p) and adopted a subsection (q) in order to preserve consistent labeling with similar requirements in 35 Ill. Adm. Code 218.

q) Miscellaneous Metal Parts and Products Coatings and Plastic Parts and Products Coatings On and After May 1, 2012. On and after May 1, 2012, the owner or operator of a miscellaneous metal or plastic parts coating line must comply with the limitations in subsection (q). The limitations in subsection (q) do not apply to aerosol coating products, powder coatings, or primer sealants and ejection cartridge sealants used in ammunition manufacturing. Primer sealants and ejection cartridge sealants are regulated under Subpart TT.

1) Metal Parts and Products. For purposes of this subsection (q)(1), "corrosion resistant basecoat" means a water-borne epoxy coating applied via an electrodeposition process to a metal surface prior to spray coating, for the purpose of enhancing corrosion resistance. The limitations in subsection (q)(1) do not apply to stencil coats, safety-indicating coatings, solid-film lubricants, electric-insulating and thermal-conducting coatings, magnetic data storage disk coatings, and plastic extruded onto metal parts to form a coating. The limitations in Section 219.219 apply to these coatings unless specifically excluded.

		kg VOM/l coating solids applied	lb VOM/gal coating solids applied
	A)	General one component coating	

	i)	Air dried	0.34 (2.8)	0.54 (4.52)
	ii)	Baked	0.28 (2.3)	0.40 (3.35)
B)	General multi-component coating			
	i)	Air dried	0.34 (2.8)	0.54 (4.52)
	ii)	Baked	0.28 (2.3)	0.40 (3.35)
C)	Camouflage coating		0.42 (3.5)	0.80 (6.67)
D)	Electric-insulating varnish		0.42 (3.5)	0.80 (6.67)
E)	Etching filler		0.42 (3.5)	0.80 (6.67)
F)	Extreme high-gloss coating			
	i)	Air dried	0.42 (3.5)	0.80 (6.67)
	ii)	Baked	0.36 (3.0)	0.61 (5.06)
G)	Extreme performance coating			
	i)	Air dried	0.42 (3.5)	0.80 (6.67)
	ii)	Baked	0.36 (3.0)	0.61 (5.06)
H)	Heat-resistant coating			
	i)	Air dried	0.42 (3.5)	0.80 (6.67)
	ii)	Baked	0.36	0.61

		(3.0)	(5.06)
I)	High performance architectural Coating	0.42 (3.5)	0.80 (6.67)
J)	High temperature coating	0.42 (3.5)	0.80 (6.67)
K)	Metallic coating		
	i) Air dried	0.42 (3.5)	0.80 (6.67)
	ii) Baked	0.36 (3.0)	0.61 (5.06)
L)	Military specification coating		
	i) Air dried	0.34 (2.8)	0.54 (4.52)
	ii) Baked	0.28 (2.3)	0.40 (3.35)
M)	Mold-seal coating	0.42 (3.5)	0.80 (6.67)
N)	Pan backing coating	0.42 (3.5)	0.80 (6.67)
O)	Prefabricated architectural coating: multi-component		
	i) Air dried	0.42 (3.5)	0.80 (6.67)
	ii) Baked	0.28 (2.3)	0.40 (3.35)
P)	Prefabricated architectural coating: one-component		
	i) Air dried	0.42 (3.5)	0.80 (6.67)
	ii) Baked	0.28	0.40

		(2.3)	(3.35)
Q)	Pretreatment coating	0.42 (3.5)	0.80 (6.67)
R)	Repair coats and touch-up coatings		
	i) Air dried	0.42 (3.5)	
	ii) Baked	0.36 (3.01)	
S)	Silicone release coating	0.42 (3.5)	0.80 (6.67)
T)	Solar-absorbent coating		
	i) Air dried	0.42 (3.5)	0.80 (6.67)
	ii) Baked	0.36 (3.0)	0.61 (5.06)
U)	Vacuum-metalizing coating	0.42 (3.5)	0.80 (6.67)
V)	Drum coating, new, exterior	0.34 (2.8)	0.54 (4.52)
W)	Drum coating, new, interior	0.42 (3.5)	0.80 (6.67)
X)	Drum coating, reconditioned, exterior	0.42 (3.5)	0.80 (6.67)
Y)	Drum coating, reconditioned, interior	0.50 (4.2)	1.17 (9.78)
Z)	Ammunition sealants		
	i) Air dried	0.42 (3.5)	0.80 (6.67)
	ii) Baked	0.36 (3.0)	0.61 (5.06)

AA)	Electrical switchgear compartment coatings			
	i)	Air dried	0.42 (3.5)	0.80 (6.67)
	ii)	Baked	0.36 (3.0)	0.61 (5.06)
BB)	All other coatings			
	i)	Air dried	0.40 (3.3)	0.73 (5.98)
	ii)	Baked: primer/topcoat	0.34 (2.8)	0.54 (4.52)

2) Plastic Parts and Products: Miscellaneous. For purposes of this subsection (q)(2), miscellaneous plastic parts and products are plastic parts and products that are not subject to subsection (q)(3), (q)(4), (q)(5), or (q)(6). The limitations in subsection (q)(2) do not apply to touch-up and repair coatings; stencil coats applied on clear or transparent substrates; clear or translucent coatings; coatings applied at a paint manufacturing facility while conducting performance tests on the coatings; any individual coating category used in volumes less than 189.2 liters (50 gallons) in any one calendar year, if the total usage of all such coatings does not exceed 756.9 liters (200 gallons) per calendar year per source and substitute compliant coatings are not available; reflective coatings applied to highway cones; mask coatings that are less than 0.5 mm thick (dried) if the area coated is less than 25 square inches; electromagnetic interference/radio frequency interference (EMI/RFI) shielding coatings; and heparin-benzalkonium chloride (HBAC)-containing coatings applied to medical devices if the total usage of all such coatings does not exceed 378.4 liters (100 gallons) per calendar year per source. The limitations in Section 219.219 apply to these coatings unless specifically excluded.

		kg/l (lb/gal) coatings	kg/l (lb/gal) solids
A)	General one component coating	0.28 (2.3)	0.40 (3.35)
B)	General multi-component	0.42 (3.5)	0.80 (6.67)

C)	Electric dissipating coatings and shock-free coatings	0.80 (6.7)	8.96 (74.7)
D)	Extreme performance (2-pack coatings)	0.42 (3.5)	0.80 (6.67)
E)	Metallic coating	0.42 (3.5)	0.80 (6.67)
F)	Military specification coating		
	i) 1-pack coatings	0.28 (2.3)	0.54 (4.52)
	ii) 2-pack coatings	0.42 (3.5)	0.80 (6.67)
G)	Mold-seal coating	0.76 (6.3)	5.24 (43.7)
H)	Multi-colored coating	0.68 (5.7)	3.04 (25.3)
I)	Optical coating	0.80 (6.7)	8.96 (74.7)
J)	Vacuum-metalizing coating	0.80 (6.7)	8.96 (74.7)

3) Plastic Parts and Products Automotive/Transportation

		kg/l (lb/gal) coatings	kg/l (lb/gal) solids
A)	High bake coatings − interior and exterior parts		
	i) Flexible primer	0.54 (4.5)	1.39 (11.58)
	ii) Non-flexible primer	0.42 (3.5)	0.80 (6.67)

	iii)	Basecoats	0.52 (4.3)	1.24 (10.34)
	iv)	Clear coat	0.48 (4.0)	1.05 (8.76)
	v)	Non-basecoat/clear coat	0.52 (4.3)	1.24 (10.34)
B)	Low bake/air dried coatings – exterior parts			
	i)	Primers	0.58 (4.8)	1.66 (13.80)
	ii)	Basecoat	0.60 (5.0)	1.87 (15.59)
	iii)	Clear coats	0.54 (4.5)	1.39 (11.58)
	iv)	Non-basecoat/clear coat	0.60 (5.0)	1.87 (15.59)
C)	Low bake/air dried coatings – interior parts			
	i)	Color coat	0.38 (3.2)	0.67 (5.66)
	ii)	Primer	0.42 (3.5)	0.80 (6.67)
D)	Touchup and repair coatings		0.62 (5.2)	2.13 (17.72)
E)	Specialty			
	i)	Vacuum metallizing basecoats	0.66 (5.5)	2.62 (21.8)
	ii)	Vacuum metallizing topcoats	0.77 (6.4)	6.06 (49.1)

F) Red, yellow, and black coatings: Subject coating lines must comply with a limit determined by multiplying the appropriate

limit in subsections (q)(3)(A) through (q)(3)(C) by 1.15.

4) Plastic Parts and Products: Business Machine. The limitations of this subsection (q)(4) do not apply to vacuum metallizing coatings, gloss reducers, texture topcoats, adhesion primers, electrostatic preparation coatings, stencil coats, and resist coats other than plating resist coats. The limitations in Section 219.219 apply to these coatings unless specifically excluded.

		kg/l (lb/gal) coatings	kg/l (lb/gal) solids
A)	Primers	0.35 (2.9)	0.57 (4.80)
B)	Topcoat	0.35 (2.9)	0.57 (4.80)
C)	Color coat (texture coat)	0.28 (2.3)	0.40 (4.80)
D)	Color coat (non-texture coat)	0.28 (2.3)	0.40 (4.80)
E)	Texture coats other than color texture coats	0.35 (2.9)	0.57 (4.80)
F)	EMI/RFI shielding coatings	0.48 (4.0)	1.05 (8.76)
G)	Fog coat	0.26 (2.2)	0.38 (3.14)
H)	Touchup and repair	0.35 (2.9)	0.57 (4.80)

5) Pleasure Craft Surface Coatings

		kg/l (lb/gal) coatings	kg/l (lb/gal) solids
A)	Extreme high gloss coating – topcoat	0.60 (5.0)	1.88 (15.6)

B)	High gloss coating − topcoat	0.42 (3.5)	0.80 (6.7)
C)	Pretreatment wash primer	0.78 (6.5)	6.67 (55.6)
D)	Finish primer surfacer		
	Prior to January 1, 2014	0.60 (5.0)	1.88 (15.6)
	On and after January 1, 2014	0.42 (3.5)	0.80 (6.7)
E)	High build primer/surfacer	0.34 (2.8)	0.55 (4.6)
F)	Aluminum substrate antifoulant coating	0.56 (4.7)	1.53 (12.8)
G)	Other substrate antifoulant coating	0.40 (3.3)	0.73 (5.8)
H)	Antifouling Sealer/Tie Coat	0.42 (3.5)	0.80 (6.7)
I)	All other pleasure craft surface coating for metal or plastic	0.42 (3.5)	0.80 (6.7)

6) Motor Vehicle Materials

		kg/l (lb/gal) coatings
A)	Cavity wax	0.65 (5.42)
B)	Sealer	0.65 (5.42)
C)	Deadener	0.65 (5.42)
D)	Gasket/gasket sealing material	0.20

		(1.67)
E)	Underbody coating	0.65 (5.42)
F)	Trunk interior coating	0.65 (5.42)
G)	Bedliner	0.20 (1.67)
H)	Lubricating wax/compound	0.70 (5.84)

r) Aerospace Facilities. On and after July 1, 2021, the owner or operator of an aerospace facility must comply with the coating limitations in this subsection (r). The limitations in this subsection (r) do not apply to the following activities in which coating of aerospace components and vehicles may take place: research and development, quality control, laboratory testing, and electronic parts and assemblies (except for coating of completed assemblies). The limitations in this subsection (r) also do not apply to aerospace facility operations involving space vehicles or rework operations performed on antique aerospace vehicles or components. The coating limitations in subsections (r)(1) and (r)(2) do not apply to ~~aerosol coatings, Department of Defense classified coatings, or~~ the use of separate formulations of primers, topcoats, and chemical milling maskants, or the use of separate formulations of ~~aerospace~~ specialty coatings, in volumes of less than 50 gallons per year, subject to a maximum exemption of 200 gallons for all such formulations applied annually. The coating limitations in subsection (r)(2) do not apply to aerosol coatings or Department of Defense classified coatings.

1) VOM Content Limitations for Primers, Topcoats, and Chemical Milling Maskants

		kg/l	lb/gal
A)	Aerospace primer	0.350	(2.9)
B)	Primer for general aviation rework facility	0.540	(4.5)
C)	Exterior primer for large commercial aircraft (components or fully assembled)	0.650	(5.4)
D)	Topcoat	0.420	(3.5)

E)	Topcoat for general aviation rework facility	0.540	(4.5)
F)	Self-priming topcoat for aerospace applications	0.420	(3.5)
G)	Self-priming topcoat for general aviation rework facility	0.540	(4.5)
H)	Chemical milling maskant, type I	0.622	(5.2)
I)	Chemical milling maskant, type II	0.160	(1.3)

2) VOM Content Limitations for Aerospace Specialty Coatings

		kg/l	lb/gal
A)	Ablative coating	0.600	(5.0)
B)	Adhesion promoter for aerospace applications	0.890	(7.4)
C)	Adhesive bonding primer cured above 250 °F	1.030	(8.6)
D)	Adhesive bonding primer cured at or below 250 °F	0.850	(7.1)
E)	Aerospace flexible primer	0.640	(5.3)
F)	Aerospace pretreatment coating	0.780	(6.5)
G)	Antichafe coating	0.660	(5.5)
H)	Bearing coating	0.620	(5.2)
I)	Bonding maskant	1.230	(10.3)
J)	Caulking and smoothing compounds	0.850	(7.1)
K)	Chemical agent-resistant coating	0.550	(4.6)
L)	Clear coating for aerospace applications	0.720	(6.0)

M)	Commercial exterior aerodynamic structure primer	0.650	(5.4)
N)	Commercial interior adhesive	0.760	(6.3)
O)	Compatible substrate primer	0.780	(6.5)
P)	Corrosion prevention system	0.710	(5.9)
Q)	Critical use and line sealer maskant	1.020	(8.5)
R)	Cryogenic flexible primer	0.645	(5.4)
S)	Cryoprotective coating	0.600	(5.0)
T)	Cyanoacrylate adhesive	1.020	(8.5)
U)	Dry lubricative material for aerospace applications	0.880	(7.3)
V)	Electrostatic discharge and electromagnetic interference coating	0.800	(6.7)
W)	Elevated temperature Skydrol-resistant commercial primer	0.740	(6.2)
X)	Epoxy-polyamide topcoat	0.660	(5.5)
Y)	Extrudable, rollable, or brushable sealant for aerospace applications	0.280	(2.3)
Z)	Fire-resistant interior coating	0.800	(6.7)
AA)	Flight test coatings: missile or single use aircraft	0.420	(3.5)
BB)	Flight test coatings: all other	0.840	(7.0)
CC)	Fuel tank adhesive for aerospace applications	0.620	(5.2)
DD)	Fuel tank coating for aerospace applications	0.720	(6.0)

EE)	High temperature coating	0.850	(7.1)
FF)	Insulation covering	0.740	(6.2)
GG)	Intermediate release coating	0.750	(6.3)
HH)	Lacquer	0.830	(6.9)
II)	Metallized epoxy coating	0.740	(6.2)
JJ)	Mold release coating for aerospace applications	0.780	(6.5)
KK)	Nonstructural adhesive for aerospace applications	0.360	(3.0)
LL)	Optical anti-reflective coating	0.750	(6.3)
MM)	Part marking aerospace coating	0.850	(7.1)
NN)	Radiation-effect or electric coating	0.800	(6.7)
OO)	Rain erosion-resistant coating	0.850	(7.1)
PP)	Rocket motor bonding adhesive	0.890	(7.4)
QQ)	Rocket motor nozzle coating	0.660	(5.5)
RR)	Rubber-based adhesive	0.850	(7.1)
SS)	Scale inhibitor	0.880	(7.3)
TT)	Screen print ink for aerospace applications	0.840	(7.0)
UU)	Seal coat maskant	1.230	(10.3)
VV)	Sprayable sealant for aerospace applications	0.600	(5.0)
WW)	Silicone insulation material	0.850	(7.1)
XX)	Solid film lubricant	0.880	(7.3)
YY)	Specialized function coating	0.890	(7.4)

ZZ)	Structural autoclavable adhesive for aerospace applications	0.060	(0.5)
AAA)	Structural nonautoclavable adhesive for aerospace applications	0.850	(7.1)
BBB)	Temporary protective coating for aerospace applications	0.320	(2.7)
CCC)	Thermal control coating for aerospace applications	0.800	(6.7)
DDD)	Wet fastener installation coating	0.675	(5.6)
EEE)	Wing coating	0.850	(7.1)

(Source: Amended at __ Ill. Reg. __, effective _____)

TECHNICAL SUPPORT DOCUMENT

for

CONTROL of VOM from AEROSPACE COATING and SOLVENT USE

AQPSTR 25-01

June 2025

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
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1.0 Summary

The purpose of this Technical Support Document ("TSD") is to present the rationale and methodology relied upon to support the Illinois Environmental Protection Agency's ("Illinois EPA" or "Agency") proposed regulatory revisions for control of Volatile Organic Material ("VOM") emissions from aerospace manufacturing and rework facilities ("aerospace facilities") in the counties of Madison, Monroe, and St. Clair ("Metro-East area"). This TSD discusses the Agency's reasons for proposing the rulemaking, the technical feasibility, economic reasonableness, and cost effectiveness of the proposed control measures, as well as the sources potentially affected by the proposed regulation.

The Illinois Pollution Control Board previously adopted VOM Reasonable Available Control Technology ("RACT") rules specifically for aerospace facilities on March 4, 2021, which were approved by USEPA into Illinois' State Implementation Plan on April 11, 2023. *See* 88 FR 21490. (The Agency did not propose similar amendments to 35 IAC Part 218 because there are no known sources in the Chicago area to which the rules would apply.)

Illinois EPA has reviewed and evaluated the requirements of the Clean Air Act ("CAA"), the Illinois Environmental Protection Act, the United States Environmental Protection Agency's ("USEPA") *Control Techniques Guidelines for Control of Volatile Organic Compound Emissions from Coating Operations at Aerospace Manufacturing and Rework Operations* ("aerospace CTG"), and the National Emission Standards for Hazardous Air Pollutants for Aerospace Manufacturing and Rework Operations ("aerospace NESHAP") at Title 40 of the Code of Federal Regulations ("CFR") Part 63 Subpart GG. In addition, Illinois EPA has consulted with representatives of one of the three potentially affected sources in Illinois. Based on this information, Illinois EPA is proposing to amend the existing Illinois aerospace regulations to allow an exemption to apply to additional categories of aerospace coating to be consistent with the aerospace CTG and aerospace NESHAP. These categories were inadvertently omitted when the existing Illinois regulations were proposed and adopted.

The Illinois EPA has determined that the proposed revisions are both technically feasible and economically reasonable.

The proposed regulatory changes, if adopted, will amend the CTG-recommended control measures for the Metro-East area in Title 35 of the Illinois Administration Code ("IAC") Part 219.

2.0 Potentially Affected Source Description

The aerospace industry consists of civilian and military original equipment manufacturers and rework facilities, and a number of subcontractors, with some of those subcontractors dedicated to the aerospace industry and others often classified under non-aerospace industrial classifications. The industry manufactures and reworks complete aerospace vehicles and aerospace parts.
Examples of aerospace vehicles are airplanes, helicopters, missiles, rockets, satellites, and spacecraft. Aerospace facilities may employ all or some of the following operations: fabricating, processing, assembling, repairing, and coating. Application of coatings and cleaning with solvents are the significant sources of VOM emissions from aerospace facilities.

For the proposal of the existing aerospace coating regulations, Illinois EPA researched and analyzed its emissions database and the classification of sources in the Metro-East area and determined that three sources are potentially affected by the aerospace coating regulations. The applicability threshold for aerospace facilities is a facility's potential to emit being greater than 25 tons of VOM per year. These three sources are Gulfstream Aerospace Services Corp. in Cahokia, Premiere Air Center Inc. in East Alton, and Boeing in Mascoutah. The Agency's determination of applicability for those sources resulted from the Agency's efforts to follow the aerospace CTG screening suggestions and not from any final determination of whether an emission source would be affected by the proposed regulations.

3.0 Unit Description and Emissions

The aerospace CTG describes in detail coating application operations as having significant potential to emit VOM.

Coating application is a process of painting a surface area. Several common application methods are brush coating, dip coating, flow coating, roll coating, electrodeposition, electrostatic spray, high-volume low-pressure spray, and low-volume low-pressure spray.

The aerospace CTG states on page 2-6:

> "*A coating is a material that is applied to the surface of a part to form a decorative, protective, or functional solid film. The most common coatings are the broad categories of nonspecialized primers and topcoats … There are also numerous specialty coatings covered by this guidance that provide additional performance characteristics, such as temperature, fluid, fire resistance, flexibility, substrate compatibility, antireflection, temporary protection or marking, sealing, adhesively joining substrates, enhanced corrosion protection, or compatibility with a space environment*."

Several types of coating operations include specialty coatings, but primers and topcoats are the two main types of coatings used.

Coatings are a mixture of solids and liquids. The function of the liquids, some of which contains VOM, is to dissolve the solids and control the viscosity of the coating for easy delivery to the target surface area. At the end of the coating process, the liquids evaporate and leave the solids in the target surface area, thus the entire VOM content of the coating is emitted in the absence of add-on pollution control equipment. The exemption for VOM content limits on low volume coatings proposed in this rulemaking has been taken directly from the aerospace CTG and the aerospace NESHAP. Low volume coatings are coatings that use separate formulations in volumes of less than 50 gallons per year subject to a maximum exemption of 200 gallons per year for all such formulations.

4.0 VOM Control Options and Cost Effectiveness

Controlling VOM emissions from aerospace facilities can be achieved by using lower-VOM coatings and cleaning solvents, or by using add-on emission control systems.

The aerospace CTG states that the most common cost-effective control option available for aerospace facilities is the use of coatings that are compliant with CTG limits and the proposed regulations, and by implementing the CTG work practices.

Coating application processes at aerospace facilities can be divided into three categories: primers, topcoats, and specialty coatings with primers and topcoats constituting the majority of coatings used at aerospace facilities. Compliant coatings are generally waterborne coatings, consisting of close to 80 percent water and 20 percent solids, or coatings consisting of a high solids content relative to the VOM content that contain 60 percent solids or more. To a lesser extent, powder coating can be used, but since those usually require baking to cure, they are more commonly used for smaller aerospace parts.

The aerospace CTG states on page 4-4:

> *"The broad categories of primers, topcoats (including self-priming topcoats), and chemical milling maskants (Type I/II) are not specialty coatings as listed in Table 4-1 and are regulated for major sources under the Aerospace NESHAP requiring MACT limits with a compliance date specified in 40 CFR 63.749(a). These limits may be assumed to represent RACT limits 1 year after the major sources are required to meet the MACT limits and, therefore, shall not be effective until 1 year after the NESHAP compliance date of September 1, 1998.* ***The requirements do not apply to facilities that use separate formulations of primers, topcoats, and chemical milling maskants (Type I/II) in volumes of less than 50 gallons per year, subject to a maximum exemption of 200 gallons total for such formulations applied annually.****"*

The aerospace NESHAP states at 40 CFR 63.741(g):

> *"The requirements for primers, topcoats, specialty coatings, and chemical milling maskants in §§ 63.745 and 63.747 do not apply to the use of low-volume coatings in these categories for which the annual total of each separate formulation used at a facility does not exceed 189 l (50 gal), and the combined annual total of all such primers, topcoats, specialty coatings, and chemical milling maskants used at a facility does not exceed 757 l (200 gal)."*

The aerospace CTG and aerospace NESHAP both provide exemptions for separate formulations that individually do not exceed 50 gallons annually and combined do not exceed 200 gallons annually.

4.1 Technical Feasibility and Economic Reasonableness of Compliant Coatings

The proposed regulation revisions are technically feasible as they are only intended to make the existing rule language more consistent with the aerospace CTG and the federal aerospace NESHAP, which was the Agency's intent when the aerospace coatings regulations were originally adopted. The proposed revisions allow an exemption to apply to additional categories of coatings that provides additional flexibility to subject sources, and the amendment was requested by a potentially impacted source.

The proposed revisions are also economically reasonable, as it is not anticipated that the proposed revisions will result in any additional costs for the potentially affected sources. The revisions would only allow for the exemption of a low volume of primers, topcoats, and chemical milling maskants consistent with the aerospace CTG and applicable aerospace NESHAP. This will not result in additional costs to affected sources as this may only provide subject sources additional compliance flexibility.

5.0 Existing Regulations

The proposed amendments will apply to aerospace facilities, defined in 35 IAC Part 211.277 as any facility that produces, reworks, or repairs any commercial, civil, or military aerospace vehicle or component.

Illinois currently has rules specifically applicable to the aerospace coating process under 35 IAC Part 219.204(r)(1) and 219.204(r)(2).

6.0 Proposed Revisions

In drafting the proposed revisions, the Illinois EPA reviewed the USEPA aerospace CTG and the aerospace NESHAP. The current aerospace coating regulations allow a low volume exemption only to specialty coatings in volumes of less than 50 gallons per year, subject to a maximum exemption of 200 gallons total. The proposed revision would amend the aerospace coating regulations to allow primers, topcoats and chemical milling maskants to also be included in the low volume exemption in volumes of less than 50 gallons per year, and the source would still be subject to the same maximum exemption of 200 gallons total for all such formulations applied annually. This is consistent with the aerospace CTG and aerospace NESHAP.

The proposed revisions are intended to more closely reflect the language of the CTG-recommended RACT-level control of VOM for aerospace facilities. The Agency has determined that affected facilities can comply with the proposed revisions with minimal or no additional costs as the revisions allow additional flexibility in the low volume coating exemption.

7.0 Demonstration of noninterference under Section 110(l) of the CAA

Section 110(l) of the CAA states:

> *"Each revision to an implementation plan submitted by a State under this Act shall be adopted by such State after reasonable notice and public hearing. The Administrator shall not approve a revision of a plan if the revision would interfere with any applicable requirement concerning attainment and reasonable further progress (as defined in CAA Section 171), or any other applicable requirement of this Act."*

The Illinois EPA does not anticipate that the adoption of these rule revisions will result in additional

emissions of any pollutant at existing sources in Illinois as the revisions only make Illinois' regulation more consistent with the aerospace CTG and aerospace NESHAP and will not allow additional allowable emissions since the existing maximum exemption of 200 gallons per year for all formulations combined remains the same. The proposed rule will not interfere with any applicable requirement concerning attainment and reasonable further progress, or any other applicable requirement of the CAA. If adopted, the proposed rules will be submitted as a revision of the Illinois State Implementation Plan for approval by the USEPA.

United States Environmental Protection Agency
Office of Air Quality Planning and Standards Research Triangle Park, NC 27711
EPA-453/R-97-004 December 1997
Air

EPA **Guideline Series**

Control of Volatile Organic Compound Emissions from Coating Operations at Aerospace Manufacturing and Rework Operations

CTG

Guideline Series:

Control of Volatile Organic Compound Emissions from Coating Operations at Aerospace Manufacturing and Rework Operations

Emission Standards Division

U. S. Environmental Protection
Agency Office of Air and
Radiation
Office of Air Quality Planning and Standards
Research Triangle Park, NC 27711

December 1997

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TABLE 4-1. SPECIALTY COATINGS VOC CONTENT LIMITS 4-2

1.0 INTRODUCTION

The Clean Air Act (CAA) as amended in 1990 requires that State implementation plans (SIP's) for certain ozone nonattainment areas be revised to require the implementation of reasonably available control technology (RACT) to control volatile organic compound (VOC) emissions. The U. S. Environmental Protection Agency (EPA) has defined RACT as the lowest emission limitation that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility. The EPA has issued, and is continuing to issue, control techniques guideline documents (CTG's) that present feasible RACT control measures for VOC source categories. The CTG's recommend "presumptive norms" of control for each source category, but individual sources may have alternative RACT requirements imposed by making an adequate infeasibility demonstration (44 FR 53761, September 17, 1979).

Section 183(b)(3) of the CAA requires the EPA Administrator to issue a CTG for the control of VOC emissions from coatings and solvents used in the aerospace industry. This CTG is intended to supersede any potential applicability of the Miscellaneous Metal Part and Products CTG (RACT) requirements for manufacturing and rework operations of aerospace vehicles and components. According to the CAA, this CTG guidance should also reflect control resulting from applying the "best available control (BAC) measures." Section 183(e)(1)(A) defines "BAC" as the "most effective equipment, measures, processes, methods, systems or techniques, including chemical reformulation, product or feedstock substitution, repackaging, and directions for use,

consumption, storage, or disposal." Therefore, this CTG departs from the approach followed in the other CTG's by not recommending a single approach for determining RACT, but investigating a range of approaches to reduce VOC emissions from aerospace operations. Several optional approaches comprise the presumptive RACT found in this CTG.

The CTG's are intended to provide State and local air pollution control authorities with an information base for proceeding with their analyses of RACT for their own regulations. The CTG's contain a review of current knowledge and data concerning the technology, impacts, and costs associated with various emission control techniques. Where applicable, the EPA recommends that States adopt requirements consistent with the presumptive RACT. However, these measures are only a recommendation; States may develop their own RACT requirements on a case-by-case basis, considering the economic and technical circumstances of individual sources. It should be noted that no Federal laws or regulations preclude States from requiring more stringent controls than those recommended as RACT. A particular State, for example, may broaden the applicability by revising the "aerospace vehicle or component" definition to include models, mock-ups, prototypes, and production equipment such as molds, jigs, and tooling. Some States may need additional control in order to meet the national ambient air quality standards (NAAQS) for ozone in some areas.

This CTG identifies presumptive RACT for controlling VOC emissions from aerospace coatings and cleaning solvents. National emission standards for hazardous air pollutants (NESHAP) for aerospace manufacturing and rework operations were published on September 1, 1995 (60 FR 45948). While these final standards address the reduction of HAP emissions, the control techniques required by the NESHAP will result in reductions of VOC emissions as well. In addition, the control techniques required by the NESHAP are similar to those addressed in this CTG for reducing VOC emissions. Because the emission reductions, costs, and environmental impacts have already been determined for major HAP

sources and are attributed to the NESHAP (see Docket No. A-90-20, Subcategory II-B), these impacts are not summarized in this CTG.

While the Aerospace NESHAP sets limits for maximum HAP and VOC content for topcoats, primers, maskants, clean-up solvents, and cleaning operations, the CTG establishes presumptive RACT limits for VOC's. The CTG includes requirements for Specialty Coatings, which are not covered by the Aerospace NESHAP. The Clean Air Act specifies that solvents will be addressed in the Aerospace CTG. However, because the CTG is guidance to be adopted as individual State regulations and SIP's, it does not specify detailed requirements for monitoring, testing, recordkeeping, and reporting as the NESHAP has done. Rather, the States are directed under previous EPA guidance for establishing RACT (57 FR 13502, April 16, 1992) to develop "enforceable regulations" containing such requirements. While EPA is providing an example of such a regulation in the model rule (Appendix B), this CTG allows States the flexibility to address those requirements as long as they meet EPA enforceability criteria.

2.0 AEROSPACE MANUFACTURING AND REWORK OPERATIONS

1.1 GENERAL

The aerospace industry being evaluated includes all manufacturing facilities that produce an aerospace vehicle or component and all facilities that rework or repair these aerospace products. Aerospace vehicle or component is defined as, but not limited to, any fabricated part, processed part, assembly of parts, or completed unit of any aircraft including, but not limited to, airplanes, helicopters, missiles, rockets, and space vehicles. In addition to manufacturing and rework facilities, some shops may specialize in providing a service, such as chemical milling, rather than actually producing a component or assembly. In general, aerospace manufacturing and rework facilities are covered by the SIC codes listed in Table 2-1. However, facilities classified under other SIC codes may be subject to the proposed rule if the facility meets the definition of a major source and the definition of an aerospace manufacturing or rework facility.

TABLE 2-1. AEROSPACE MANUFACTURING SIC CODES

SIC Code	Description
3720	Aircraft and Parts
3721	Aircraft
3724	Aircraft Engines and Engine Parts
3728	Aircraft Parts and Equipment
3760	Guided Missiles, Space Vehicles, and Parts
3761	Guided Missiles and Space Vehicles
3764	Space Propulsion Units and Parts
3769	Space Vehicle Equipment
4512	Air Transportation, Scheduled
4581	Airports, Flying Fields, and Services
9711	National Security

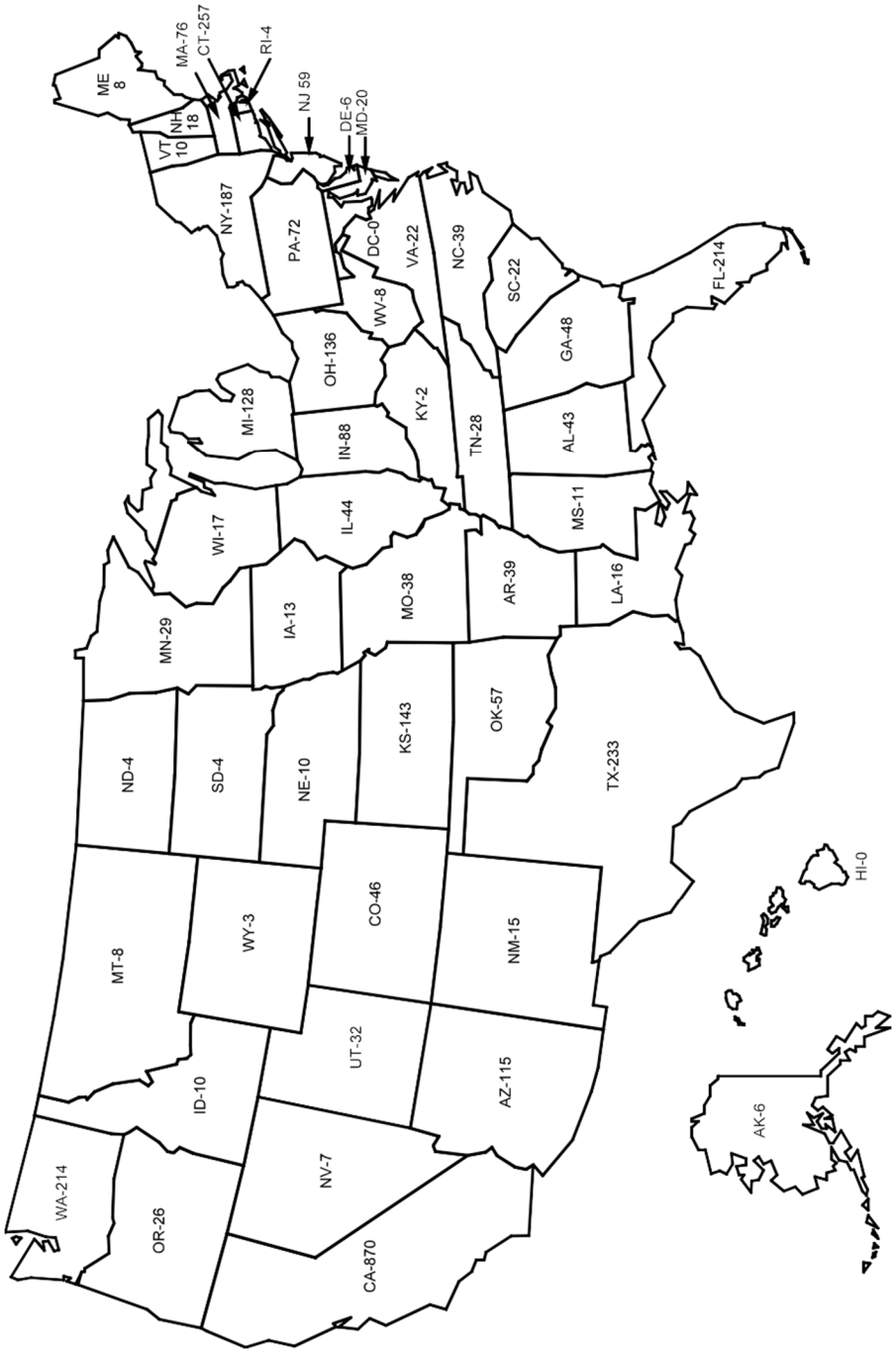
Aerospace facilities may be divided into four market segments: commercial original equipment manufacturers (OEM), commercial rework facilities, military OEM's, and military rework facilities. The commercial OEM segment of the market includes the manufacture of commercial aircraft as well as the production of business and private aircraft. The military OEM segment of the market includes military installations and defense contractors that manufacture aircraft, missiles, rockets, satellites, and spacecraft. Rework facilities, both commercial and military, may rework many of the above end products.

Based on information obtained through the Federal Aviation Administration and the U.S. Department of Commerce - Bureau of the Census, there are an estimated 2,869 aerospace facilities that could be subject to this guidance. Of this number, 1,395 produce or rework commercial products, and 1,474 produce or rework military products. The combined VOC emissions from these facilities are estimated to be over 213,000 megagrams/year (Mg/yr) (234,000 tons/yr).

In addition to these facilities, there are numerous subcontractors that manufacture or rework aerospace vehicles or

components. The subcontractors may work directly for the OEM or rework facilities, or indirectly through first line subcontractors. Because most of these subcontractors perform various types of work, they are often classified under non-aerospace SIC codes. Consequently, an estimate of the number of subcontractors cannot be made. One company alone, however, employs the services of over 5,000 subcontractors.

Aerospace manufacturing facilities and rework operations typically are located in or near industrial centers in areas of medium to high population density. Some States with a large number of aerospace manufacturers are California, Texas, Connecticut, Florida, and Washington. Figure 2-1 presents the number of aerospace manufacturing facilities by State.


ME 8
MA-76
CT-257
RI-4
NJ 59
DE-6
MD-20
VT 10
NH 18
NY-187
PA-72
DC-0
VA-22
NC-39
SC-22
FL-214
WV-8
OH-136
GA-48
MI-128
KY-2
TN-28
AL-43
IN-88
WI-17
IL-44
MS-11
MO-38
AR-39
LA-16
MN-29
IA-13
ND-4
SD-4
NE-10
KS-143
OK-57
TX-233
MT-8
WY-3
CO-46
NM-15
HI-0
UT-32
AZ-115
ID-10
AK-6
WA-214
OR-26
NV-7
CA-870

Aerospace manufacturing facilities range in size from small shops that produce a single aerospace component, such as propellers, to large corporations that produce the entire aircraft. Aerospace rework facilities, however, are usually large facilities that must be able to rework or repair every facet of several models of large commercial or military aircraft.

The hours of operation at aerospace manufacturing and rework facilities may vary greatly due to the production backlog at each facility. The hours of operation may range from 8 hours (or less) per day, 5 days per week, to 24 hours per day, 7 days per week.

1.2 PROCESS DESCRIPTION

Aerospace manufacturing and rework operations typically consist of the following basic operations: materials receiving, machining and mechanical processing, coating application, chemical milling, heat treating, cleaning, metal processing and finishing, coating removal (depainting), composite processing, and testing. Many aerospace manufacturing and rework facilities may employ all of these processes in their operations, as with an OEM facility that produces the entire aerospace vehicle. However, an aerospace facility may only employ a subset of these operations, as with a facility that produces a single component or assembly or a facility that provides a service such as chemical milling. Of these operations, coating application and cleaning are the significant sources of VOC emissions and are the processes covered by this Aerospace CTG in the following sections.

1.2.1 Coating Application

A coating is a material that is applied to the surface of a part to form a decorative, protective, or functional solid film. The most common coatings are the broad categories of nonspecialized primers and topcoats that are regulated for major sources under the Aerospace NESHAP. There are also numerous specialty coatings covered by this guidance that provide

additional performance characteristics, such as temperature, fluid, fire resistance, flexibility, substrate compatibility, antireflection, temporary protection or marking, sealing, adhesively joining substrates, enhanced corrosion protection, or compatibility with a space environment. Each material is different because it must meet individual performance standards particular to a specific design. The quality of the coatings is critical to the airworthiness and safety of the final product. Aerospace vehicle manufacturing is strictly controlled by the Federal Aviation Administration, the Department of Defense, and specific customer requirements. Industry specifications for coatings are dictated by these requirements.

Most aerospace coatings are solvent-borne, which contain a mixture of organic solvents, many of which are VOC's. The most common VOC solvents used in coatings are toluene, xylene, methyl ethyl ketone, and methyl isobutyl ketone. The VOC content ranges differ for the various coating categories.

1.2.1.1 Sealing. Sealants, predominately composed of polysulfide, are applied throughout the aerospace vehicle structure primarily to seal out moisture and contaminants to prevent corrosion, such as on faying (i.e., closely or tightly fitting) surfaces, inside holes and slots, and around installed fasteners. They are also used to seal fuel tanks and pressurized components. Sealants are applied using tubes, spatulas, brushes, rollers, or spray guns. Sealants are often stored frozen and thawed before use, and many are two-component mixtures that cure after mixing. Typically, a sealant is applied before assembly or fastener installation, and the excess is squeezed out or extruded from between the parts as the assembly is completed. This ensures a moisture-tight seal between the parts.

1.2.1.2 Adhesive Bonding. Adhesive bonding involves joining together two or more metal or nonmetal components. This process is typically performed when the joints being formed are essential to the structural integrity of the aerospace vehicle or component. Bonding surfaces are typically roughened mechanically or etched chemically to provide increased surface area for

Figure 2-1. Active U.S. aerospace manufacturing facilities.

bonding and then treated chemically to provide a stable corrosion-resistant oxide layer. The surfaces are then thinly coated with an adhesive bonding primer to promote adhesion and protect from subsequent corrosion. Structural adhesives are applied as either a thin film or as a paste. The parts are joined together and cured either at ambient temperature, in an oven, or in an autoclave to cure the adhesive and provide a permanent bond between the components.

Nonstructural adhesives are used to bond materials that are not critical to the structural integrity of the aerospace vehicle or component, such as gaskets around windows and carpeting or to nonstructurally joined components. These adhesives are applied using tubes, brushes, and spray guns.

1.2.2 Cleaning

Cleaning agents for hand-wipe, flush, and spray equipment cleaning consist of solvents such as methyl ethyl ketone, methyl isobutyl ketone, toluene, various solvent blends, or alkaline materials.

1.2.2.1 Hand-Wipe and Flush Cleaning. Aerospace components are cleaned frequently during manufacturing to remove contaminants such as dirt, grease, and oil, and to prepare the components for the next operation. Cleaning is typically performed by a hand wiping process using a wide variety of cleaning solvents. Assemblies and parts with concealed or inaccessible areas may be flush-cleaned by passing the cleaning agent over, into, or through the part. The cleaning agent is then drained from the part and the procedure is repeated as many times as necessary to ensure the required cleanliness.

1.2.2.2 Spray Gun and Coating Line Cleaning. Spray guns and coating lines used to apply the various coatings used at aerospace facilities must be cleaned when switching from one coating to another and when they are not going to be immediately reused. Spray guns can be cleaned either manually or with enclosed spray gun cleaners. Manual cleaning involves disassembling the gun and placing the parts in a vat containing an appropriate cleaning solvent. The residual paint is brushed

or wiped off the parts. After reassembling, the cleaning solvent may be sprayed through the gun for a final cleaning. Paint hoses/coating lines are cleaned by passing the cleaning solvent through the lines until all coating residue is removed. Enclosed spray gun cleaners are self-contained units that pump the cleaning solvent through the gun within a closed chamber. After the cleaning cycle is complete, the guns are removed from the chamber and typically undergo some manual cleaning to remove coating residue from areas not exposed to the cleaning solvent, such as the seals under the atomizing cap.

3.0 EMISSION CONTROL TECHNIQUES

The principal technique used by the aerospace industry to control VOC emissions from coating application and cleaning is product substitution, which eliminates or reduces the generation of emissions. The emission reduction is obtained using less energy and producing less waste than using a control device to achieve the same emission reductions.

The VOC emissions may be controlled by replacing products containing high concentrations of VOC's with ones that have reduced or eliminated VOC's. Different aerospace manufacturers use different processes to produce their product. Therefore, they typically have different specifications for the coatings and cleaning solvents used on the components of the end products. Each individual facility must evaluate the ability of the new product to maintain standards of quality and performance. In addition, the potential overall environmental benefit of the reformulated products must be carefully evaluated.

The following sections describe the available product substitutions for coatings and cleaning solvents. While alternative methods, such as control devices (carbon adsorbers, incinerators, etc.), are occasionally used to reduce emissions, they do not represent RACT and are, therefore, not discussed below.

3.1 COATING SUBSTITUTIONS

Waterborne and high solids materials are generally used for coating substitutions. Specialty coatings typically have relatively low usage, so reformulation to lower VOC contents does not produce significant air quality benefits nor is it economically feasible for the paint suppliers. Paint suppliers

and the aerospace industry generally have targeted high volume materials for reformulation efforts. Therefore, lower VOC formulations are not available for most of the low volume specialty coating categories.

3.2 EQUIPMENT CHANGES

The aerospace industry has implemented several equipment changes that directly reduce the level of VOC emissions. While there are equipment changes that effect emissions from every process, the three changes predominantly used in the industry are high transfer efficiency spray guns, spray gun cleaners, and conventional high transfer efficiency methods. Each of these equipment changes are discussed below.

3.2.1 High Transfer Efficiency Spray Guns

Emissions from spray coating operations can be reduced through the use of spraying systems with higher transfer efficiency. Transfer efficiency, expressed as a percentage, can be defined as the ratio of coating solids actually applied to the surface of the component being coated to the amount of solids released from the spray gun. Spraying systems with a higher transfer efficiency can coat the same surface area using less coating. Therefore, the VOC emissions resulting from the use of this equipment are reduced compared to applying the same coating with conventional spray equipment. The transfer efficiency values reported in this section depend on coating sprayed, part configuration, spray booth air velocity, and other variables.

Most aerospace components are coated using manual spray equipment utilizing conventional airspray or airless spraying technology. The following sections discuss two types of high transfer coating application equipment generally used in the aerospace industry for the application of primers and topcoats: high volume, low pressure (HVLP) and electrostatic (use of these types of high transfer efficiency for specialty coatings is limited).

3.2.1.1 High Volume Low Pressure Spray Guns. High volume low pressure and electrostatic spraying systems are the primary high efficiency spray methods used by the industry. High volume

low pressure spray guns use high volumes [10 to 25 standard cubic feet per minute (scfm)] of low pressure [2 to 10 pounds per square inch gauge (psig)] air to deliver the paint. The lower air pressure creates a lower particle speed, resulting in a more controlled spray pattern with less overspray and bounce back from the substrate, thus improving transfer efficiency.

High volume low pressure systems have been in use in the United States for approximately 10 years. In early systems, turbines were used to supply a high volume of low pressure air to the spray guns through large hoses. The second generation used compressed air with an air regulator to maintain the required low pressure. The third and current generation of HVLP equipment uses restrictors within the gun to reduce the atomization pressure to a maximum of 10 psi at the air cap.

One disadvantage of HVLP spray guns is that some very high solids coatings are difficult to atomize due to their higher viscosities. However, when a turbine is used, the temperature of the atomizing air increases which aids in reducing the viscosity of the coating. Other disadvantages of HVLP spray guns are that they cannot be used with extension nozzles, and they may slow production rates because of the low fluid delivery rates.

It is estimated that HVLP can apply approximately 80 percent of the coating currently used in the aerospace industry, including primers, waterborne coatings, and both single and two-component topcoats. A medium commercial/rework facility utilizes HVLP equipment with high solids paint and has had a reduction of 22 to 30 percent in coating usage for various aircraft types. The HVLP technology has proven easy to use and maintain. It also provides high transfer efficiency and appears to be the preferred spray technology in the aerospace industry at this time.

Table 3-1

TABLE 3-1. PERCENT REDUCTION IN COATING EMISSIONS (PRIMERS AND TOPCOATS) WITH HIGH TRANSFER EFFICIENCY EQUIPMENT FROM SECTION 114 DATA

Size	Commercial or military	OEM or rework	High transfer equipment	% Reduction in emissions
Large	Military	OEM	HVLP	20
Large	Military	OEM	HVLP	20
Large	Military	OEM	HVLP	25
Large	Commercial	OEM	Unspecified	30
Large	Commercial	OEM	Unspecified	18
Medium	Commercial Military Military	OEM OEM Rework	HVLP	25
Medium	Commercial Military Military	OEM OEM Rework	HVLP	20-40
Medium	Military	OEM	HVLP and electrostatic	40
Medium	Military	OEM	HVLP and electrostatic	40
Medium	Military	OEM	HVLP	40
Medium	Military	OEM	HVLP	10
Medium	Military Military	OEM Rework	Electrostatic	30-40
Medium	Military	Rework	HVLP and electrostatic	35-40
Medium	Commercial	OEM	Unspecified	30
Medium	Commercial	OEM	Unspecified	33
Medium	Commercial	Rework	HVLP and electrostatic	50
Medium	Commercial	Rework	HVLP and high solids	22% for large aircraft 25% for medium aircraft 30% for small aircraft
Small	Commercial	OEM	Unspecified	30
Small	Commercial Military	OEM OEM	HVLP	28

shows the reduction in emissions obtained from the Section 114 questionnaire responses from various facilities utilizing high transfer efficiency equipment such as HVLP or electrostatic equipment, either alone, in conjunction with each other, or, in one case, HVLP equipment with high solids coatings.

3.2.1.2 Electrostatic Spray Guns. With electrostatic spray systems, atomized particles of coating acquire an electric charge as they pass through a high voltage field at the end of the spray nozzle. This electric charge causes the particles to be attracted to the parts being painted, which are electrically grounded. Although other substrates can be pretreated with conductive coatings, this technology is primarily used for metal parts. The electrostatic effect can be utilized in conjunction with air spray, airless, and air-assisted airless systems to enhance the transfer efficiencies of these basic technologies. See Table 3-1 for examples of percent reduction obtained at various facilities using electrostatic spray guns or electrostatic spray guns in combination with HVLP spray guns.

3.2.2 Spray Gun Cleaning

Spray guns are typically cleaned at the end of every job, as well as between color changes. Manual cleaning of spray guns involves disassembling the gun and placing the parts in a tray containing an appropriate cleaning solvent. The residual paint is brushed or wiped off the parts, then cleaning solvent is sprayed through the gun after it is reassembled. Various methods are used to minimize the resulting emissions from spray gun cleaning and are discussed below.

Enclosed system. Enclosed spray gun cleaners are completely enclosed units that spray the cleaning solvent through and over the spray gun. The enclosed unit eliminates most of the exposure of the cleaning solvent to the air, thereby greatly reducing the VOC emissions from evaporation.

Nonatomized cleaning. Cleaning solvent is placed in the pressure pot and forced through the gun with the atomizing cap in place. No atomizing air is to be used. The cleaning solvent from the spray gun is directed into a vat, drum, or other waste container that is closed when not in use.

Disassembled spray gun cleaning. Manual cleaning (described above) with the components cleaned by hand in a vat, which is only closed when not in use. Alternatively, the components are

soaked in a vat, which is closed at all times except when components are being inserted or removed.

Atomizing cleaning. Cleaning solvent is forced through the spray gun and the resulting atomized spray is directed into a waste container that is fitted with a device designed to capture the atomized solvent emissions.

3.2.3 Conventional High Transfer Efficiency Application Methods

Conventional high transfer efficiency application methods for primers and topcoats include dip, roll, brush, and flow coating (use of these methods for specialty coatings is limited). These methods are discussed below.

Dip Coating. With dip coating application, parts are immersed into a tank of coating. The parts are then removed from the tank and held over it until the excess coating drips back into the tank. This method is simple and allows many different parts to be coated with high transfer efficiency. However, dip coating is limited to parts that can fit into the dip tank. Other parts difficult to dip coat could include complex parts that would trap the coating, allowing unequal coating thicknesses.

Roll Coating. In roll coating application, a series of mechanical rollers are used to coat flat surfaces. This method achieves high efficiency with high rates of application and automation. However, roll coating is limited to flat parts.

Brush Coating. In brush coating application, brushes and hand rollers are used to apply the coating manually. This method is used with operations (e.g., touch-up and detail painting) that cannot tolerate the overspray associated with spray gun application. For example, if a facility needs to paint only the tail section of an airplane, it may be easier to brush coat this area than to mask the entire plane to protect the rest of the shell from overspray. This application method typically involves high labor costs, increased production time, and poor coating thickness control.

Flow Coating. In flow coating application, the part is conveyed over a closed sink, and a pumped stream of coating

gently flows over the surface of the part. The excess coating is drained into the sink, filtered, and pumped to a holding tank for reuse. Flow coating is typically limited to flat sheets and noncritical parts. Coating thickness is difficult to control using flow coating.

3.3 HAND-WIPE CLEANER SUBSTITUTIONS

Product substitutions for hand-wipe cleaning that are prevalent in the aerospace industry can be classified as aqueous, semiaqueous, citrus-based, and reduced vapor pressure. Each category is discussed below.

3.3.1 Aqueous and Semiaqueous

Aqueous and semiaqueous cleaners contain water as the base component rather than an organic solvent or mixture of solvents. Other components may include corrosion inhibitors, alkalinity builders, and organic surfactants, depending on the desired soil removal properties. Aqueous and semiaqueous cleaners have been used in noncritical areas where strict cleanliness requirements do not have to be met, or where there are no confined spaces that may trap residues of the cleaner.

The advantages of using aqueous and semiaqueous cleaning solvents include reduced VOC emissions. Disadvantages are increased production time due to slower evaporation rates, possible decreased efficiency, and possible increase in wastewater treatment requirements. In addition, aqueous cleaners may not be applicable to all aerospace parts, especially those components that have small confined spaces where the cleaner residues cannot be adequately removed.

3.3.2 Citrus-Based

Citrus-based terpenes such as d-limonene are the primary components in many alternative cleaning solutions. While these solutions have high VOC contents, their vapor pressure is very low, leading to reduced evaporation rates. These cleaners have been found to be effective in some cleaning operations except for cleaning prior to adhesive bonding. Some disadvantages include possible worker sensitivity, VOC emissions, lack of rinseability

in water, and increased production time due to slower evaporation rates.

3.3.3 Reduced Vapor Pressure

Reduced vapor pressure cleaning solvents have a maximum VOC composite vapor pressure of 45 millimeters of mercury (mmHg) at 20°C. Cleaning solvent emissions are reduced because their lower vapor pressure leads to reduced evaporation rates. These cleaners are effective in many cleaning operations except for some limited operations such as cleaning oxygen systems.

4.0 PRESUMPTIVE RACT REQUIREMENTS

The presumptive RACT requirements for the aerospace component and vehicle cleaning and coating operations are described in the following sections. The operations covered by this CTG shall not be subject to another CTG. The operations and applications exempted under this CTG shall not be subject to another CTG. Applicable definitions are included in Appendix A.

These presumptive RACT requirements do not apply to manufacturing or rework operations involving space vehicles; rework operations performed on antique aerospace vehicles or components; or to the following activities where cleaning and coating of aerospace components and vehicles may take place: research and development, quality control, laboratory testing, and electronic parts and assemblies (except for cleaning and coating of completed assemblies).

4.1 SPECIALTY COATINGS

Presumptive RACT for coatings used on aerospace components and vehicles is based on VOC content. Except as provided in Sections 4.0 and 4.1, the presumptive RACT for coating VOC content is the use of coatings with a VOC content less than or equal to that given in Table 4-1: Specialty Coatings VOC Content Limits.

TABLE 4-1. SPECIALTY COATINGS VOC CONTENT LIMITS (g/L)[a]

Coating type	Limit
Ablative Coating	600
Adhesion Promoter	890
Adhesive Bonding Primers:	
Cured at 250°F or below	850
Cured above 250°F	1030
Adhesives:	
Commercial Interior Adhesive	760
Cyanoacrylate Adhesive	1,020
Fuel Tank Adhesive	620
Nonstructural Adhesive	360
Rocket Motor Bonding Adhesive	890
Rubber-based Adhesive	850
Structural Autoclavable Adhesive	60
Structural Nonautoclavable Adhesive	850
Antichafe Coating	660
Bearing Coating	620
Caulking and Smoothing Compounds	850
Chemical Agent-Resistant Coating	550
Clear Coating	720
Commercial Exterior Aerodynamic Structure Primer	650
Compatible Substrate Primer	780
Corrosion Prevention Compound	710
Cryogenic Flexible Primer	645
Cryoprotective Coating	600
Dry Lubricative Material	880
Electric or Radiation-Effect Coating	800
Electrostatic Discharge and Electromagnetic Interference (EMI) Coating	800
Elevated-Temperature Skydrol-Resistant Commercial Primer	740
Epoxy Polyamide Topcoat	660
Fire-Resistant (interior) Coating	800
Flexible Primer	640
Flight-Test Coatings:	
Missile or Single Use Aircraft	420
All Other	840
Fuel-Tank Coating	720
High-Temperature Coating	850
Insulation Covering	740
Intermediate Release Coating	750
Lacquer	830
Maskants:	
Bonding Maskant	1,230
Critical Use and Line Sealer Maskant	1,020
Seal Coat Maskant	1,230
Metallized Epoxy Coating	740
Mold Release	780
Optical Anti-Reflective Coating	750
Part Marking Coating	850
Pretreatment Coating	780
Rain Erosion-Resistant Coating	850
Rocket Motor Nozzle Coating	660
Scale Inhibitor	880
Screen Print Ink	840
Sealants:	
Extrudable/Rollable/Brushable Sealant	280
Sprayable Sealant	600
Silicone Insulation Material	850
Solid Film Lubricant	880
Specialized Function Coating	890
Temporary Protective Coating	320
Thermal Control Coating	800
Wet Fastener Installation Coating	675
Wing Coating	850

[a]Coating limits are expressed in terms of mass (grams) or VOC per volume (liter) of coating less water and less exempt solvent.

Exemptions. The following applications are exempt from the presumptive RACT coating limits in Table 4-1:

1. Touchup, aerosol, and DOD classified coatings;

2. Coatings used on space vehicles; and

3. Facilities that use separate formulations in volumes of less than 50 gallons per year, subject to a maximum exemption of 200 gallons for all such formulations applied annually.

4.2 PRIMERS, TOPCOATS, CHEMICAL MILLING MASKANTS

The broad categories of primers, topcoats (including self-priming topcoats), and chemical milling maskants (Type I/II) are not specialty coatings as listed in Table 4-1 and are regulated for major sources under the Aerospace NESHAP requiring MACT limits with a compliance date specified in 40 CFR 63.749(a). These limits may be assumed to represent RACT limits 1 year after the major sources are required to meet the MACT limits and, therefore, shall not be effective until 1 year after the NESHAP compliance date of September 1, 1998. The requirements do not apply to facilities that use separate formulations of primers, topcoats, and chemical milling maskants (Type I/II) in volumes of less than 50 gallons per year, subject to a maximum exemption of 200 gallons total for such formulations applied annually.

4.3 APPLICATION EQUIPMENT FOR PRIMERS AND TOPCOATS

Presumptive RACT for primer and topcoat (including self-priming topcoats) application equipment used on aerospace components and vehicles is based on current practices and requirements in some States. Except as provided in Section 4.3 and Subsection 4.3.1, the presumptive RACT for primer and topcoat (including self-priming topcoat) application equipment is the use of one or more of the following application techniques: flow/curtain coat; dip coat; roll coating; brush coating; cotton-tipped swab application; electrodeposition coating; high volume low pressure (HVLP) spraying; electrostatic spray; or other coating application methods that achieve emission reductions equivalent to HVLP or electrostatic spray application methods.

4.3.1 Exemptions

The following situations are exempt from the presumptive RACT application techniques described in Section 4.3:

1. Any situation that normally requires the use of an airbrush or an extension on the spray gun to properly reach limited access spaces;

2. The application of specialty coatings;

3. The application of coatings that contain fillers that adversely affect atomization with HVLP spray guns and that the permitting agency has determined cannot be applied by any of the application methods specified in Section 4.3;

4. The application of coatings that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.) and that the permitting agency has determined cannot be applied by any of the application methods specified in Section 4.3;

5. The use of airbrush application methods for stenciling, lettering, and other identification markings;

6. The use of hand-held spray can application methods; and

7. Touch-up and repair operations.

4.3.2 Timing (Schedule) of Compliance

The application techniques identified as presumptive RACT are regulated for major sources under the Aerospace NESHAP requiring MACT application equipment with a compliance date of September 1, 1998 specified in 40 CFR 63.749(a). These equipment requirements may be assumed to represent RACT requirements 1 year after the major sources are required to meet the MACT equipment requirements and, therefore, shall not be effective until 1 year after the NESHAP compliance date of September 1, 1998.

4.4 CLEANING OPERATIONS

For solvent cleaning operations, this guidance departs from the standard presumptive RACT requirement to incorporate MACT level controls. Therefore, the requirements of Section 4.2 shall not become effective prior to the Aerospace NESHAP compliance date of September 1, 1998. The MACT and RACT for solvent cleaning is based on work practices and cleaning solvent composition. Except as provided in Section 4.0 and Subsection 4.4.2, MACT and RACT for certain activities is described below.

4.4.1 Housekeeping

All fresh and used cleaning solvents, except semiaqueous cleaning solvents, used in solvent cleaning operations shall be stored in containers that shall be kept closed at all times except when filling or emptying. It is recommended that cloth and paper, or other absorbent applicators, moistened with cleaning solvents be stored in closed containers. Cotton-tipped swabs used for very small cleaning operations are exempt. In addition, the owner or operator must implement handling and transfer procedures to minimize spills during filling and transferring the cleaning solvent to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or used cleaning solvents. The above requirements are known collectively as housekeeping measures. Aqueous cleaning solvents are excluded from these housekeeping requirements.

4.4.2 Hand-Wipe Cleaning

Hand-wipe cleaning operations require the use of cleaning solvents which are aqueous or have a VOC composite vapor pressure less than or equal to 45 millimeters of mercury (mm Hg) at 20°C.

Exemptions

The following cleaning operations would be exempt from the cleaning solvent composition and vapor pressure requirements stated in Section 4.4.2:

1. Cleaning during the manufacture, assembly, installation, maintenance, or testing of components of breathing oxygen systems that are exposed to the breathing oxygen;

2. Cleaning during the manufacture, assembly, installation, maintenance, or testing of parts, subassemblies, or assemblies that are exposed to strong oxidizers or reducers (e.g., nitrogen tetroxide, liquid oxygen, hydrazine);

3. Cleaning and surface activation prior to adhesive bonding;

4. Cleaning of electronics and assemblies containing electronics;

5. Cleaning of aircraft and ground support equipment fluid systems that are exposed to the fluid, including air-to-air heat exchangers and hydraulic fluid systems;

6. Cleaning of fuel cells, fuel tanks, and confined spaces;

7. Surface cleaning of solar cells, coated optics, and thermal control surfaces;

8. Cleaning during fabrication, assembly, installation, and maintenance of upholstery, curtains, carpet, and other textile materials used on the interior of the aircraft;

9. Cleaning of metallic and nonmetallic materials used in honeycomb cores during the manufacture or maintenance of these cores, and cleaning of the completed cores used in the manufacture of aerospace vehicles or components;

10. Cleaning of aircraft transparencies, polycarbonates, or glass substrates;

11. Cleaning and cleaning solvent usage associated with research and development, quality control, or laboratory testing;

12. Cleaning operations, using nonflammable liquids, conducted within 5 feet of energized electrical systems. Energized electrical systems means any AC or DC electrical circuit on an assembled aircraft once electrical power is connected, including interior passenger and cargo areas, wheel wells, and tail sections; and

13. Cleaning operations identified as essential uses under the Montreal Protocol for which the Administrator has allocated essential use allowances or exemptions in 40 CFR § 82.4.

4.4.3 Flush Cleaning

For cleaning solvents used in the flush cleaning of aerospace parts, assemblies, and coating unit components, the used cleaning solvent (except for semiaqueous cleaning solvents) must be emptied into an enclosed container or collection system that is kept closed when not in use or captured on wipers and disposed of in accordance with Section 4.4.1. Aqueous cleaning solvents are excluded from these flush cleaning requirements.

4.4.4 Spray Gun Cleaning

All spray guns must be cleaned by one or more of the following methods:

1. Enclosed spray gun cleaning system that is kept closed when not in use, provided that leaks from enclosed spray gun cleaners are repaired within 14 days from when the leak is first discovered. If the leak is not repaired by the 15th day after detection, the cleaning solvent shall be removed and the enclosed cleaner shall be shut down until the leak is repaired or its use is permanently discontinued;

2. Unatomized discharge of cleaning solvent into a waste container that is kept closed when not in use;

3. Disassembled spray gun that is cleaned in a vat and kept closed when not in use; or

4. Atomized spray into a waste container that is fitted with a device designed to capture atomized cleaning solvent emissions.

5.0 GUIDANCE TO STATE ENFORCEMENT AGENCIES

This chapter presents information for air quality management agencies to consider in developing an enforceable rule limiting VOC emissions from coating and solvent cleaning operations at aerospace manufacturing and rework facilities. The State or other implementing agency can exercise its prerogative to consider other options provided that they meet the objectives prescribed in this chapter.

This guidance is for instructional purposes only and, as such, is not binding. In the development of a State or local aerospace manufacturing and rework operations rule, the State or other enforcement agency should consider all information presented in the CTG and the promulgated NESHAP along with additional information about specific sources to which the rule will apply. The reasonably available control technology (RACT) rule, however, should address all the factors listed in this chapter and in Section 4 to ensure that the rule has reasonable provisions for demonstrating compliance and is enforceable. A model rule which contains all these requirements is provided in Appendix B. The model rule is guidance only and the State or local agency has the flexibility to adopt alternative measures, including market-based incentive programs, provided they meet EPA enforceability criteria.

5.1 DEFINITIONS

The RACT rule should accurately describe the types of sources that would be affected and clearly define terms used to describe the industry or applicable control methods. Example definitions of pertinent terms are presented in Appendix A for reference by the State or local agency.

5.2 APPLICABILITY

The recommended RACT described in this document applies to the manufacture of aerospace vehicles and components as well as the rework or repair of these aerospace products. (See Section 2.) This guidance has been developed for affected sources in areas of moderate, serious, or severe nonattainment that have the potential to emit greater than or equal to 25 tons per year of VOC's. The guidance is intended to apply to affected sources in extreme areas, however, if potential VOC emissions are greater than or equal to 10 tons per year. The State or local agency has the flexibility to apply RACT as deemed necessary. For example, an agency may apply RACT to all sources that have actual emissions at 50 percent of these thresholds.

5.3 COMPLIANCE, MONITORING, RECORDKEEPING & REPORTING PROVISIONS

The State or local agency is responsible for ensuring that appropriate requirements for compliance determination (testing), monitoring, recordkeeping and reporting are incorporated into its RACT rule. These requirements must meet two objectives: (1) the agency's need to demonstrate VOC emission reductions and (2) EPA's criteria for enforceability. Because source types, compliance methods, and agency requirements may vary substantially across the nation, specific provisions for compliance determination (testing), monitoring, recordkeeping and reporting are not included in this CTG.

However, for a State's RACT rules to be enforceable, they must definitively set forth recordkeeping, monitoring, and compliance determination (testing) requirements appropriate to the type of source(s) being regulated and sufficient to allow determinations whether the source(s) are in compliance. Therefore, EPA's Model Rule, which accompanies this CTG, contains suggested recordkeeping, testing, and monitoring provisions that EPA believes are sufficient to enable EPA and the States to determine compliance with the RACT requirements of the Model Rule. The State or other implementing agency can exercise its prerogative to consider various recordkeeping, testing, and monitoring requirements provided they meet the objectives

prescribed in this CTG. This guidance is for instructional purposes only and, as such, is not binding.

APPENDIX A. DEFINITIONS

Terms used in this CTG and the Model Rule in Appendix B are defined in the Clean Air Act (Act), or in this section as follows:

Ablative coating means a coating that chars when exposed to open flame or extreme temperatures, as would occur during the failure of an engine casing or during aerodynamic heating. The ablative char surface serves as an insulative barrier, protecting adjacent components from the heat or open flame.

Adhesion promoter means a very thin coating applied to a substrate to promote wetting and form a chemical bond with the subsequently applied material.

Adhesive bonding primer means a primer applied in a thin film to aerospace components for the purpose of corrosion inhibition and increased adhesive bond strength by attachment. There are two categories of adhesive bonding primers: primers with a design cure at 250°F or below and primers with a design cure above 250°F.

Aerosol coating means a hand-held, pressurized, nonrefillable container that expels an adhesive or a coating in a finely divided spray when a valve on the container is depressed.

Aerospace vehicle or component means any fabricated part, processed part, assembly of parts, or completed unit, with the exception of electronic components, of any aircraft including but not limited to airplanes, helicopters, missiles, rockets, and space vehicles.

Aircraft fluid systems means those systems that handle hydraulic fluids, fuel, cooling fluids, or oils.

Aircraft transparency means the aircraft windshield, canopy, passenger windows, lenses and other components which are constructed of transparent materials.

Antichafe coating means a coating applied to areas of moving aerospace components that may rub during normal operations or installation.

Antique aerospace vehicle or component means an aircraft or component thereof that was built at least 30 years ago. An antique aerospace vehicle would not routinely be in commercial or military service in the capacity for which it was designed.

Aqueous cleaning solvent means a solvent in which water is at least 80 percent of the solvent as applied.

Bearing coating means a coating applied to an antifriction bearing, a bearing housing, or the area adjacent to such a bearing in order to facilitate bearing function or to protect base material from excessive wear. A material shall not be classified as a bearing coating if it can also be classified as a dry lubricative material or a solid film lubricant.

Bonding maskant means a temporary coating used to protect selected areas of aerospace parts from strong acid or alkaline solutions during processing for bonding.

Caulking and smoothing compounds means semi-solid materials which are applied by hand application methods and are used to aerodynamically smooth exterior vehicle surfaces or fill cavities such as bolt hole accesses. A material shall not be classified as a caulking and smoothing compound if it can also be classified as a sealant.

Chemical agent-resistant coating (CARC) means an exterior topcoat designed to withstand exposure to chemical warfare agents or the decontaminants used on these agents.

Chemical milling maskant means a coating that is applied directly to aluminum components to protect surface areas when chemical milling the component with a Type I or II etchant. Type I chemical milling maskants are used with a Type I etchant and Type II chemical milling maskants are used with a Type II etchant. This definition does not include bonding maskants,

critical use and line sealer maskants, and seal coat maskants. Additionally, maskants that must be used with a combination of Type I or II etchants and any of the above types of maskants (i.e., bonding, critical use and line sealer, and seal coat) are not included. Maskants that are defined as specialty coatings are not included under this definition.

Cleaning operation means collectively spray-gun, hand-wipe, and flush cleaning operations.

Cleaning solvent means a liquid material used for hand-wipe, spray gun, or flush cleaning. This definition does not include solutions that contain no VOC.

Clear coating means a transparent coating usually applied over a colored opaque coating, metallic substrate, or placard to give improved gloss and protection to the color coat. In some cases, a clearcoat refers to any transparent coating without regard to substrate.

Closed-cycle depainting system means a dust free, automated process that removes permanent coating in small sections at a time, and maintains a continuous vacuum around the area(s) being depainted to capture emissions.

Coating means a material that is applied to the surface of an aerospace vehicle or component to form a decorative, protective, or functional solid film, or the solid film itself.

Coating operation means using a spray booth, tank, or other enclosure or any area, such as a hangar, for applying a single type of coating (e.g., primer); using the same spray booth for applying another type of coating (e.g., topcoat) constitutes a separate coating operation for which compliance determinations are performed separately.

Coating unit means a series of one or more coating applicators and any associated drying area and/or oven wherein a coating is applied, dried, and/or cured. A coating unit ends at the point where the coating is dried or cured, or prior to any subsequent application of a different coating. It is not necessary to have an oven or flashoff area to be included in this definition.

Commercial exterior aerodynamic structure primer means a primer used on aerodynamic components and structures that protrude from the fuselage, such as wings and attached components, control surfaces, horizontal stabilizers, vertical fins, wing-to-body fairings, antennae, and landing gear and doors, for the purpose of extended corrosion protection and enhanced adhesion.

Commercial interior adhesive means materials used in the bonding of passenger cabin interior components. These components must meet the FAA fireworthiness requirements.

Compatible substrate primer means either compatible epoxy primer or adhesive primer. Compatible epoxy primer is primer that is compatible with the filled elastomeric coating and is epoxy based. The compatible substrate primer is an epoxy-polyamide primer used to promote adhesion of elastomeric coatings such as impact-resistant coatings. Adhesive primer is a coating that (1) inhibits corrosion and serves as a primer applied to bare metal surfaces or prior to adhesive application, or (2) is applied to surfaces that can be expected to contain fuel. Fuel tank coatings are excluded from this category.

Confined space means a space that (1) is large enough and so configured that an employee can bodily enter and perform assigned work; (2) has limited or restricted means for entry or exit (for example, fuel tanks, fuel vessels, and other spaces that have limited means of entry); and (3) is not suitable for continuous employee occupancy.

Corrosion prevention system means a coating system that provides corrosion protection by displacing water and penetrating mating surfaces, forming a protective barrier between the metal surface and moisture. Coatings containing oils or waxes are excluded from this category.

Critical use and line sealer maskant means a temporary coating, not covered under other maskant categories, used to protect selected areas of aerospace parts from strong acid or alkaline solutions such as those used in anodizing, plating, chemical milling and processing of magnesium, titanium, or high-

strength steel, high-precision aluminum chemical milling of deep cuts, and aluminum chemical milling of complex shapes. Materials used for repairs or to bridge gaps left by scribing operations (i.e., line sealer) are also included in this category.

Cryogenic flexible primer means a primer designed to provide corrosion resistance, flexibility, and adhesion of subsequent coating systems when exposed to loads up to and surpassing the yield point of the substrate at cryogenic temperatures (-275°F and below).

Cryoprotective coating means a coating that insulates cryogenic or subcooled surfaces to limit propellant boil-off, maintain structural integrity of metallic structures during ascent or re-entry, and prevent ice formation.

Cyanoacrylate adhesive means a fast-setting, single component adhesive that cures at room temperature. Also known as "super glue."

Dry lubricative material means a coating consisting of lauric acid, cetyl alcohol, waxes, or other noncross linked or resin-bound materials that act as a dry lubricant.

Electric or radiation-effect coating means a coating or coating system engineered to interact, through absorption or reflection, with specific regions of the electromagnetic energy spectrum, such as the ultraviolet, visible, infrared, or microwave regions. Uses include, but are not limited to, lightning strike protection, electromagnetic pulse (EMP) protection, and radar avoidance. Coatings that have been designated as "classified" by the Department of Defense are exempt.

Electrostatic discharge and electromagnetic interference (EMI) coating means a coating applied to space vehicles, missiles, aircraft radomes, and helicopter blades to disperse static energy or reduce electromagnetic interference.

Elevated-temperature Skydrol-resistant commercial primer means a primer applied primarily to commercial aircraft (or commercial aircraft adapted for military use) that must withstand immersion in phosphate-ester (PE) hydraulic fluid (Skydrol 500b

or equivalent) at the elevated temperature of 150°F for 1,000 hours.

Epoxy polyamide topcoat means a coating used where harder films are required or in some areas where engraving is accomplished in camouflage colors.

Exempt solvent means a specified organic compound that has been determined by the EPA to have negligible photochemical reactivity and is listed in 40 CFR 51.100.

Fire-resistant (interior) coating means for civilian aircraft, fire-resistant interior coatings are used on passenger cabin interior parts that are subject to the FAA fireworthiness requirements. For military aircraft, fire-resistant interior coatings are used on parts that are subject to the flammability requirements of MIL-STD-1630A and MIL-A-87721. For space applications, these coatings are used on parts that are subject to the flammability requirements of SE-R-0006 and SSP 30233.

Flexible primer means a primer that meets flexibility requirements such as those needed for adhesive bond primed fastener heads or on surfaces expected to contain fuel. The flexible coating is required because it provides a compatible, flexible substrate over bonded sheet rubber and rubber-type coatings as well as a flexible bridge between the fasteners, skin, and skin-to-skin joints on outer aircraft skins. This flexible bridge allows more topcoat flexibility around fasteners and decreases the chance of the topcoat cracking around the fasteners. The result is better corrosion resistance.

Flight test coating means a coating applied to aircraft other than missiles or single-use aircraft prior to flight testing to protect the aircraft from corrosion and to provide required marking during flight test evaluation.

Flush cleaning means removal of contaminants such as dirt, grease, oil, and coatings from an aerospace vehicle or component or coating equipment by passing solvent over, into, or through the item being cleaned. The solvent may simply be poured into the item being cleaned and then drained, or assisted by air or hydraulic pressure, or by pumping. Hand-wipe cleaning operations

where wiping, scrubbing, mopping, or other hand action are used are not included.

Fuel tank adhesive means an adhesive used to bond components exposed to fuel and must be compatible with fuel tank coatings.

Fuel tank coating means a coating applied to fuel tank components for the purpose of corrosion and/or bacterial growth inhibition and to assure sealant adhesion in extreme environmental conditions.

Grams of VOC per liter of coating (less water and less exempt solvent) means the weight of VOC per combined volume of total volatiles and coating solids, less water and exempt compounds, and can be calculated by the following equation:

$$\text{grams of VOC per liter of coating (less water and less exempt solvent)} = \frac{W_s - W_w - W_{es}}{V_s - V_w - V_{es}}$$

W_s = weight of total volatiles in grams

W_w = weight of water in grams

W_{es} = weight of exempt compounds in grams

V_s = volume of coating in liters

V_w = volume of water in liters

V_{es} = volume of exempt compounds in liters

Hand-wipe cleaning operation means removing contaminants such as dirt, grease, oil, and coatings from an aerospace vehicle or component by physically rubbing it with a material such as a rag, paper, or cotton swab that has been moistened with a cleaning solvent.

High temperature coating means a coating designed to withstand temperatures of more than 350°F.

High volume low pressure (HVLP) spray equipment means spray equipment that is used to apply coating by means of a spray gun that operates at 10.0 psig of atomizing air pressure or less at the air cap.

Insulation covering means material that is applied to foam insulation to protect the insulation from mechanical or environmental damage.

Intermediate release coating means a thin coating applied beneath topcoats to assist in removing the topcoat in depainting operations and generally to allow the use of less hazardous depainting methods.

Lacquer means a clear or pigmented coating formulated with a nitrocellulose or synthetic resin to dry by evaporation without a chemical reaction. Lacquers are resoluble in their original solvent.

Leak means any visible leakage, including misting and clouding.

Limited access space means internal surfaces or passages of an aerospace vehicle or component that cannot be reached without the aid of an airbrush or a spray gun extension for the application of coatings.

Metalized epoxy coating means a coating that contains relatively large quantities of metallic pigmentation for appearance and/or added protection.

Mold release means a coating applied to a mold surface to prevent the molded piece from sticking to the mold as it is removed.

Nonstructural adhesive means an adhesive that bonds nonload bearing aerospace components in noncritical applications and is not covered in any other specialty adhesive categories.

Operating parameter value means a minimum or maximum value established for a control equipment or process parameter that, if achieved by itself or in combination with one or more other operating parameter values, determines that an owner or operator has continued to comply with an applicable emission limitation.

Optical antireflection coating means a coating with a low reflectance in the infrared and visible wavelength ranges that is used for antireflection on or near optical and laser hardware.

Part marking coating means coatings or inks used to make identifying markings on materials, components, and/or assemblies. These markings may be either permanent or temporary.

Pretreatment coating means an organic coating that contains at least 0.5 percent acids by weight and is applied directly to

metal or composite surfaces to provide surface etching, corrosion resistance, adhesion, and ease of stripping.

Primer means the first layer and any subsequent layers of identically formulated coating applied to the surface of an aerospace vehicle or component. Primers are typically used for corrosion prevention, protection from the environment, functional fluid resistance, and adhesion of subsequent coatings. Primers that are defined as specialty coatings are not included under this definition.

Radome means the nonmetallic protective housing for. electromagnetic transmitters and receivers (e.g., radar, electronic countermeasures, etc.).

Rain erosion-resistant coating means a coating or coating system used to protect the leading edges of parts such as flaps, stabilizers, radomes, engine inlet nacelles, etc. against erosion caused by rain impact during flight.

Research and development means an operation whose primary purpose is for research and development of new processes and products and that is conducted under the close supervision of technically trained personnel and is not involved in the manufacture of final or intermediate products for commercial purposes, except in a de minimis manner.

Rocket motor bonding adhesive means an adhesive used in rocket motor bonding applications.

Rocket motor nozzle coating means a catalyzed epoxy coating system used in elevated temperature applications on rocket motor nozzles.

Rubber-based adhesive means a quick setting contact cement that provide a strong, yet flexible bond between two mating surfaces that may be of dissimilar materials.

Scale inhibitor means a coating that is applied to the surface of a part prior to thermal processing to inhibit the formation of scale.

Screen print ink means an ink used in screen printing processes during fabrication of decorative laminates and decals.

Sealant means a material used to prevent the intrusion of water, fuel, air, or other liquids or solids from certain areas of aerospace vehicles or components. There are two categories of sealants: extrudable/rollable/brushable sealants and sprayable sealants.

Seal coat maskant means an overcoat applied over a maskant to improve abrasion and chemical resistance during production operations.

Self-priming topcoat means a topcoat that is applied directly to an uncoated aerospace vehicle or component for purposes of corrosion prevention, environmental protection, and functional fluid resistance. More than one layer of identical coating formulation may be applied to the vehicle or component.

Semiaqueous cleaning solvent means a solution in which water is a primary ingredient ($\geq$60 percent of the solvent solution as applied must be water).

Silicone insulation material means an insulating material applied to exterior metal surfaces for protection from high temperatures caused by atmospheric friction or engine exhaust. These materials differ from ablative coatings in that they are not "sacrificial."

Solids means the nonvolatile portion of the coating that after drying makes up the dry film.

Solid film lubricant means a very thin coating consisting of a binder system containing as its chief pigment material one or more of the following: molybdenum, graphite, polytetrafluoroethylene (PTFE), or other solids that act as a dry lubricant between faying (i.e., closely or tightly fitting) surfaces.

Space vehicle means a man-made device, either manned or unmanned, designed for operation beyond earth's atmosphere. This definition includes integral equipment such as models, mock-ups, prototypes, molds, jigs, tooling, hardware jackets, and test coupons. Also included is auxiliary equipment associated with test, transport, and storage, that through contamination can compromise the space vehicle performance.

Specialty coating means a coating that, even though it meets the definition of a primer, topcoat, or self-priming topcoat, has additional performance criteria beyond those of primers, topcoats, and self-priming topcoats for specific applications. These performance criteria may include, but are not limited to, temperature or fire resistance, substrate compatibility, antireflection, temporary protection or marking, sealing, adhesively joining substrates, or enhanced corrosion protection.

Specialized function coating means a coating that fulfills extremely specific engineering requirements that are limited in application and are characterized by low volume usage. This category excludes coatings covered in other Specialty Coating categories.

Spray gun means a device that atomizes a coating or other material and projects the particulates or other material onto a substrate.

Structural autoclavable adhesive means an adhesive used to bond load-carrying aerospace components that is cured by heat and pressure in an autoclave.

Structural nonautoclavable adhesive means an adhesive cured under ambient conditions that is used to bond load-carrying aerospace components or other critical functions, such as nonstructural bonding in the proximity of engines.

Surface preparation means the removal of contaminants from the surface of an aerospace vehicle or component or the activation or reactivation of the surface in preparation for the application of a coating.

Temporary protective coating means a coating applied to provide scratch or corrosion protection during manufacturing, storage, or transportation. Two types include peelable protective coatings and alkaline removable coatings. These materials are not intended to protect against strong acid or alkaline solutions. Coatings that provide this type of protection from chemical processing are not included in this category.

Thermal control coating means a coating formulated with specific thermal conductive or radiative properties to permit temperature control of the substrate.

Topcoat means a coating that is applied over a primer on an aerospace vehicle or component for appearance, identification, camouflage, or protection. Topcoats that are defined as specialty coatings are not included under this definition.

Touch-up and repair coating means a coating used to cover minor coating imperfections appearing after the main coating operation.

Touch-up and repair operation means that portion of the coating operation that is the incidental application of coating used to cover minor imperfections in the coating finish or to achieve complete coverage. This definition includes out-of-sequence or out-of-cycle coating.

Volatile organic compound (VOC) means any compound defined as VOC in 40 CFR 51.100. This includes any organic compound other than those determined by the EPA to be an exempt solvent. For purposes of determining compliance with emission limits, VOC will be measured by the approved test methods. Where such a method also inadvertently measures compounds that are exempt solvent, an owner or operator may exclude these exempt solvents when determining compliance with an emission standard.

VOC composite vapor pressure means the sum of the partial pressures of the compounds defined as VOC's and is determined by the following calculation:

$$PP_c = \sum_{i=1}^{n} \frac{\frac{W_i}{MW_i} \times VP_i}{\frac{W_w}{MW_w} + \frac{\sum_{i=1}^{n} W_e}{MW_e} + \sum_{i=1}^{n} \frac{W_i}{MW_i}}$$

W_i = Weight of the "i"th VOC compound, grams.

W_w = Weight of water, grams.

W_e = Weight of nonwater, non-VOC compound, grams.

MW_i = Molecular weight of the "i"th VOC compound, g/g-mole.

MW_w = Molecular weight of water, g/g-mole.

MW_e = Molecular weight of exempt compound, g/g-mole.

PP_c = VOC composite partial pressure at 20°C, mm Hg.

VP_i = Vapor pressure of the "i"th VOC compound at 20°C, mm Hg.

Waterborne (water-reducible) coating means a coating which contains more than 5 percent water by weight as applied in its volatile fraction.

Wet fastener installation coating means a primer or sealant applied by dipping, brushing, or daubing to fasteners that are installed before the coating is cured.

Wing coating means a corrosion-resistant topcoat that is resilient enough to withstand the flexing of the wings.

APPENDIX B. AEROSPACE MANUFACTURING AND REWORK OPERATIONS MODEL RULE

B.1 APPLICABILITY

(a) Provisions of this Rule

(1) Except as noted in (a)(2) and (a)(3), this rule applies to the manufacture or rework of commercial, civil, or military aerospace vehicles or components at facilities located in severe, serious, and moderate ozone nonattainment areas that have the potential to emit 25 tons per year of VOC or more or are located in extreme nonattainment areas and have potential to emit 10 tons per year or more.

(2) This rule does not apply to the following activities where cleaning and coating of aerospace components and vehicles may take place: research and development, quality control, laboratory testing, and electronic parts and assemblies (except for cleaning and coating of completed assemblies).

(3) This rule does not apply to manufacturing or rework operations involving space vehicles or rework operations performed on antique aerospace vehicles or components.

B.2 DEFINITIONS

For the purpose of this rule the definitions listed in Appendix A shall apply.

B.3 REQUIREMENTS

(a) VOC content of coatings.

(1) A person shall not apply to aerospace vehicles or components any specialty coatings, including any VOC-containing materials added to the original coating supplied by the manufacturer, that contain VOC in excess of the limits specified below:

VOC CONTENT LIMITS FOR SPECIALTY COATINGS (g/L)[a]

Coating type	Limit
Ablative Coating	600
Adhesion Promoter	890
Adhesive Bonding Primers:	
Cured at 250°F or below	850
Cured above 250°F	1030
Adhesives:	
Commercial Interior Adhesive	760
Cyanoacrylate Adhesive	1,020
Fuel Tank Adhesive	620
Nonstructural Adhesive	360
Rocket Motor Bonding Adhesive	890
Rubber-based Adhesive	850
Structural Autoclavable Adhesive	60
Structural Nonautoclavable Adhesive	850
Antichafe Coating	660
Bearing Coating	620
Caulking and Smoothing Compounds	850
Chemical Agent-Resistant Coating	550
Clear Coating	720
Commercial Exterior Aerodynamic Structure Primer	650
Compatible Substrate Primer	780
Corrosion Prevention Compound	710
Cryogenic Flexible Primer	645
Dry Lubricative Material	880
Cryoprotective Coating	600
Electric or Radiation-Effect Coating	800
Electrostatic Discharge and Electromagnetic Interference (EMI) Coating	800
Elevated-Temperature Skydrol-Resistant Commercial Primer	740
Epoxy Polyamide Topcoat	660
Fire-Resistant (interior) Coating	800
Flexible Primer	640
Flight-Test Coatings:	
Missile or Single Use Aircraft	420
All Other	840
Fuel-Tank Coating	720
High-Temperature Coating	850
Insulation Covering	740
Intermediate Release Coating	750
Lacquer	830
Maskants:	
Bonding Maskant	1,230
Critical Use and Line Sealer Maskant	1,020
Seal Coat Maskant	1,230
Metallized Epoxy Coating	740
Mold Release	780
Optical Anti-Reflective Coating	750
Part Marking Coating	850
Pretreatment Coating	780
Rain Erosion-Resistant Coating	850
Rocket Motor Nozzle Coating	660
Scale Inhibitor	880
Screen Print Ink	840
Sealants:	
Extrudable/Rollable/Brushable Sealant	280
Sprayable Sealant	600
Silicone Insulation Material	850
Solid Film Lubricant	880
Specialized Function Coating	890
Temporary Protective Coating	320
Thermal Control Coating	800
Wet Fastener Installation Coating	675
Wing Coating	850

[a] Coating limits expressed in terms of mass (grams) of VOC per volume (liters) of coating less water and less exempt solvent.

(2) The following coating applications are exempt from the VOC content limits listed in paragraph (B.3)(a)(1):

(i) Touchup, aerosol, and DoD "classified" coatings

(ii) Coating of space vehicles

(iii) Facilities that use separate formulations in volumes of less than 50 gallons per year subject to a maximum exemption of 200 gallons total for such formulations applied annually.

(3) Primers, Topcoats, Chemical Milling Maskants. The broad categories of primers, topcoats (including self-priming topcoats), and chemical milling maskants (Type I/II) are not specialty coatings as listed in the table in (B.3)(a)(1) and are regulated for major sources under the Aerospace NESHAP requiring MACT limits with a compliance date of September 1, 1998 as specified in 40 CFR 63.749(a). These limits may be assumed to represent RACT limits 1 year after the major sources are required to meet the MACT limits and, therefore, shall not be effective until 1 year after the NESHAP compliance date. The requirements do not apply to facilities that use separate formulations of primers, topcoats, and chemical milling maskants (Type I/II) in volumes of less than 50 gallons per year, subject to a maximum exemption of 200 gallons total for such formulations applied annually.

(b) Application equipment.

(1) A person shall use one or more of the following application techniques in applying any primer or topcoat to aerospace vehicles or components: flow/curtain coat; dip coat; roll coating; brush coating; cotton-tipped swab application; electrodeposition coating; high volume low pressure (HVLP) spraying; electrostatic spray; or other coating application methods that achieve emission reductions equivalent to HVLP or electrostatic spray application methods.

(2) The following situations are exempt from application equipment requirements listed in paragraph (B.3)(b)(1):

(i) Any situation that normally requires the use of an airbrush or an extension on the spray gun to properly reach limited access spaces;

(ii) The application of specialty coatings;

(iii) The application of coatings that contain fillers that adversely affect atomization with HVLP spray guns and that the permitting agency has determined cannot be applied by any of the application methods specified in Section (B.3)(b)(1);

(iv) The application of coatings that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.) and that the permitting agency has determined cannot be applied by any of the application methods specified in Section (B.3)(b)(1);

(v) The use of airbrush application methods for stenciling, lettering, and other identification markings;

(vi) The use of hand-held spray can application methods; and

(vii) Touch-up and repair operations.

(3) The application techniques listed in paragraph (B.3)(b)(1) are regulated for major sources under the Aerospace NESHAP requiring MACT application equipment with a compliance date of September 1, 1998 specified in 40 CFR 63.749(a). These equipment requirements may be assumed to represent RACT requirements 1 year after the major sources are required to meet the MACT equipment requirements and, therefore, shall not be effective until 1 year after the NESHAP compliance date of September 1, 1998.

(c) Solvent cleaning. The following requirements apply to solvent cleaning operations and shall not be effective until the Aerospace NESHAP compliance date of September 1, 1998:

(1) Hand-wipe cleaning. Cleaning solvents used in hand-wipe cleaning operations shall:

(i) Meet the definition of aqueous cleaning solvent in Appendix A, or

(ii) Have a VOC composite vapor pressure less than or equal to 45 millimeters of mercury (mm Hg) at 20°C.

(2) The following solvent cleaning operations are exempt from the requirements in paragraph (B.3)(c)(1):

(i) Cleaning during the manufacture, assembly, installation, maintenance, or testing of components of breathing oxygen systems that are exposed to the breathing oxygen;

(ii) Cleaning during the manufacture, assembly, installation, maintenance, or testing of parts, subassemblies, or assemblies that are exposed to strong oxidizers or reducers (e.g., nitrogen tetroxide, liquid oxygen, hydrazine);

(iii) Cleaning and surface activation prior to adhesive bonding;

(iv) Cleaning of electronics parts and assemblies containing electronics parts;

(v) Cleaning of aircraft and ground support equipment fluid systems that are exposed to the fluid, including air-to-air heat exchangers and hydraulic fluid systems;

(vi) Cleaning of fuel cells, fuel tanks, and confined spaces;

(vii) Surface cleaning of solar cells, coated optics, and thermal control surfaces;

(viii) Cleaning during fabrication, assembly, installation, and maintenance of upholstery, curtains, carpet, and other textile materials used on the interior of the aircraft;

(ix) Cleaning of metallic and nonmetallic materials used in honeycomb cores during the manufacture or maintenance of these cores, and cleaning of the completed cores used in the manufacture of aerospace vehicles or components;

(x) Cleaning of aircraft transparencies, polycarbonate, or glass substrates;

(xi) Cleaning and solvent usage associated with research and development, quality control, or laboratory testing;

(xii) Cleaning operations, using nonflammable liquids, conducted within 5 feet of energized electrical systems. Energized electrical systems means any AC or DC electrical circuit on an assembled aircraft once electrical power is

connected, including interior passenger and cargo areas, wheel wells and tail sections; and,

(xiii) Cleaning operations identified as essential uses under the Montreal Protocol for which the Administrator has allocated essential use allowances or exemptions in 40 CFR § 82.4.

(3) Flush cleaning. For cleaning solvents used in the flush cleaning of parts, assemblies, and coating unit components, the used cleaning solvent (except for semiaqueous cleaning solvents) must be emptied into an enclosed container or collection system that is kept closed when not in use or captured with wipers provided they comply with the housekeeping requirements of (B.3)(c)(5). Aqueous cleaning solvents are exempt from these requirements.

(4) Spray gun cleaning. All spray guns must be cleaned by one or more of the following methods:

(i) Enclosed spray gun cleaning system provided that it is kept closed when not in use and leaks are repaired within 14 days from when the leak is first discovered. If the leak is not repaired by the 15th day after detection, the solvent shall be removed and the enclosed cleaner shall be shut down until the leak is repaired or its use is permanently discontinued,

(ii) Unatomized discharge of solvent into a waste container that is kept closed when not in use,

(iii) Disassembly of the spray gun and cleaning in a vat that is kept closed when not in use, or,

(iv) Atomized spray into a waste container that is fitted with a device designed to capture atomized solvent emissions.

(5) Housekeeping. All fresh and used cleaning solvents, except semiaqueous cleaning solvents, used in solvent cleaning operations shall be stored in containers that shall be kept closed at all times except when filling or emptying. It is recommended that cloth and paper, or other absorbent applicators, moistened with cleaning solvents be stored in closed containers. Cotton-tipped swabs used for very small cleaning operations are exempt. In addition, the owner or operator must implement

handling and transfer procedures to minimize spills during filling and transferring the cleaning solvent to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or used cleaning solvents. The above requirements are known collectively as housekeeping measures. Aqueous cleaning solvents are exempt from these requirements.

(d) Control equipment and monitoring.

(1) Each owner or operator may comply with the provisions of paragraph (B.3)(a) by using approved air pollution control equipment provided that the control system has combined VOC emissions capture and control equipment efficiency of at least 81 percent by weight.

(2) Each owner or operator shall submit a monitoring plan that specifies the applicable operating parameter value, or range of values, to ensure ongoing compliance with (B.3)(d)(1). The monitoring device shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's specifications.

(3) Each owner or operator using an enclosed spray gun cleaner shall visually inspect the seals and all other potential sources of leaks at least once per month. Each inspection shall occur while the spray gun cleaner is in operation.

B.4 RECORDKEEPING REQUIREMENTS

(a) Each owner or operator using coatings listed in (B.3)(a) shall:

(1) Maintain a current list of coatings in use with category and VOC content as applied.

(2) Record coating usage on an annual basis

(b) Each owner or operator using cleaning solvents required in (B.3)(c) shall:

(1) For aqueous and semiaqueous hand-wipe cleaning solvents, maintain a list of materials used with corresponding water contents.

(2) For vapor pressure compliant hand-wipe cleaning solvents:

(i) Maintain a current list of cleaning solvents in use with their respective vapor pressures or, for blended solvents, VOC composite vapor pressures.

(ii) Record cleaning solvent usage on an annual basis.

(3) For cleaning solvents with a vapor pressure greater than 45 mm Hg used in exempt hand-wipe cleaning operations:

(i) Maintain a list of exempt hand-wipe cleaning processes.

(ii) Record cleaning solvent usage on an annual basis.

(c) Each owner or operator using control equipment under paragraph (B.3)(d) shall record monitoring parameters as specified in the monitoring plan required under (B.3)(d)(2).

(d) Except for Specialty Coatings, any source that complies with the recordkeeping requirements of the Aerospace NESHAP, 40 CFR 63.752, is deemed to be in compliance with the requirements of this paragraph (B.4).

B.5 TEST METHODS

(a) For coatings which are not waterborne (water-reducible), determine the VOC content of each formulation (less water and less exempt solvents) as applied using manufacturer's supplied data or Method 24 of 40 CFR part 60, Appendix A. If there is a discrepancy between the manufacturer's formulation data and the results of the Method 24 analysis, compliance shall be based on the results from the Method 24 analysis. For water-borne (water-reducible) coatings, manufacturer's supplied data alone can be used to determine the VOC content of each formulation.

(b) Cleaning solvents.

(1) For aqueous and semiaqueous cleaning solvents manufacturers' supplied data shall be used to determine the water content.

(2) For hand-wipe cleaning solvents required in paragraph (B.3)(c)(1), manufacturers' supplied data or standard engineering reference texts or other equivalent methods shall be used to determine the vapor pressure or VOC composite vapor pressure for blended cleaning solvents.

(c) Control equipment. Measurements of VOC emissions subject to paragraph (B.3)(d) shall be conducted in accordance with EPA Methods 18, 25, and/or 25A (40 CFR 60, Appendix A).

(d) Except for Specialty Coatings, any source which complies with the test method requirements of the Aerospace NESHAP, 40 CFR 63.750, is deemed to be in compliance with the requirements of this paragraph (B.5).

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:	)	
	)	R25-
AMENDMENTS TO 35 ILL. ADM. CODE 219,	)	(Rulemaking-Air)
ORGANIC MATERIAL EMISSION	)	
STANDARDS FOR THE METRO EAST AREA	)	

CERTIFICATE OF SERVICE

I, the undersigned, an attorney, state the following:

I have served the attached RULEMAKING PROPOSAL, and supporting documents, by e-mail upon the following persons at the e-mail address of such persons:

Don Brown, Clerk
Illinois Pollution Control Board
60 E. Van Buren St., Suite 630
Chicago, IL 60605
don.brown@illinois.gov

SEE ATTACHED SERVICE LIST

My e-mail address is sarah.mckavetz@illinois.gov.

The number of pages in the e-mail transmission is 120 pages.

The e-mail transmission took place before 4:30 p.m. on June 12, 2025.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY,

By: /s/ Sarah McKavetz
Sarah McKavetz
Assistant Counsel
Division of Legal Counsel

Dated: June 12, 2025

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