

**TITLE 252. DEPARTMENT OF ENVIRONMENTAL QUALITY
CHAPTER 100. AIR POLLUTION CONTROL
SUBCHAPTER 37. CONTROL OF EMISSION OF VOLATILE ORGANIC
COMPOUNDS (VOCs)**

PART 5. CONTROL OF VOCs IN COATING OPERATIONS

252:100-37-27. Control of emission of VOCs from aerospace industries coatings operations

(a) Applicability.

(1) Except as noted in OAC 252:100-37-27(a)(2) through (4), this Section applies to existing or new aerospace vehicle and component coating operations at aerospace manufacturing, rework, or repair facilities. For purposes of this Section, coating operations include associated cleaning operations as specified in OAC 252:100-37-27(c)(4) and surface preparation. This includes but is not limited to facilities subject to federal standards, primarily the aerospace NESHAP 40 CFR Part 63, Subpart GG, as cited in this Section and incorporated by reference in OAC 252:100-2 and Appendix Q to Chapter 100. Coating operations subject to this Section are exempt from the requirements of OAC 252:100-37-25.

(2) This Section does not apply to manufacturing, rework, or repair operations involving space vehicles or rework or repair operations performed on antique aerospace vehicles or components.

(3) This Section does not apply to the following activities: research and development, quality control, laboratory testing, and electronic parts and assemblies (except for cleaning and coating of completed assemblies).

(4) This Section does not apply to facilities that emit from coating operations less than 100 pounds of VOC per 24-hour day, on a monthly average.

(5) Compliance with 40 CFR Part 63, Subpart GG is deemed to be compliance with all requirements of this Section.

(b) Definitions. Definitions of terms used in this Section are found in Section 63.742 and Appendix A of 40 CFR Part 63, Subpart GG, as incorporated by reference in OAC 252:100-2 and Appendix Q to Chapter 100.

(c) Standards and requirements. Coating operations subject to this section shall comply with the requirements specified in paragraph (1) of this subsection for operations uncontrolled for VOC, and in paragraph (3) of this subsection for operations that are controlled for VOC. All coating operations subject to this section shall comply with paragraphs (2), (4), and (5) of this subsection.

(1) VOC content of coatings. Each owner or operator of coating operations that are uncontrolled shall comply with the VOC content limits specified in paragraphs (c)(1)(A) through (C).

(A) VOC content limits for specialty coatings.

(i) No specialty coatings that contain VOC in excess of the limits specified in Appendix N of this Chapter shall be applied to aerospace vehicles or components. The VOC content of specialty coatings shall include any VOC-containing materials added to the original coating supplied by the manufacturer.

(ii) The VOC content limits listed in Appendix N of this Chapter do not apply to touch-up, aerosol, and United States Department of Defense (DOD) “classified” coatings.

(B) VOC content limits for primers and topcoats. Each coating operation utilizing primers and topcoats (including self-priming topcoats) that are not specialty coatings listed in Appendix N of this Chapter, shall comply with the VOC content limits contained in 40 CFR Sections 63.745(c)(2) and (c)(4).

(C) VOC content limits for chemical milling maskants. Each chemical milling maskant operation utilizing chemical milling maskants (Type I/II) that are not specialty coatings listed in Appendix N of this Chapter, shall comply with the VOC content limits contained in 40 CFR Section 63.747(c)(2) and the exemptions in 40 CFR Section 63.747(c)(3).

(D) Exemption of low volume coating usage. The requirements of OAC 252:100-37-27(c)(1) do not apply to the use of primers, topcoats, chemical milling maskants, and specialty coatings for which the annual total of each separate formulation used at the facility does not exceed 50 gallons and the combined annual total of all such primers, topcoats, chemical milling maskants, and specialty coatings used at the facility does not exceed 200 gallons. Primers, topcoats, and chemical milling maskants exempt under OAC 252:100-37-27(a) are not included in the 50 and 200 gallon limits.

(E) Compliance determination.

(i) Coatings used at facilities subject to this Section shall be deemed in compliance when the VOC content of these coatings as applied comply with the requirements of OAC 252:100-37-27(c)(1).

(ii) For purposes of determining compliance with content limits in OAC 252:100-37-27(c)(1), VOC will be measured by the approved test methods. Where such a method also inadvertently measures compounds that are exempt solvents, an owner or operator may exclude these exempt solvents when determining compliance with an emission standard.

(2) Application equipment. Each primer, topcoat, or specialty coating application operation subject to this Section shall comply with the requirements and exemptions specified in 40 CFR Section 63.745(f).

(3) Control equipment.

(A) Coating operations that use a control method for compliance with this section shall comply with paragraph (i) or (ii):

(i) Control equipment efficiency. Each owner or operator shall control VOC emissions by using approved air pollution control equipment with a combined VOC emissions capture and control equipment efficiency of 81% or greater by weight.

(ii) Alternative control method. Each owner or operator shall comply with the control requirements in 40 CFR Section 63.745(d) for any primer, topcoat, or specialty coating operation or 40 CFR Section 63.747(d) for any chemical milling maskant operation.

(B) **Compliance determination.** When control equipment is used to comply with this section, compliance shall be determined in accordance with 40 CFR Section 63.749(d) and (h).

(4) **Housekeeping measures and solvent cleaning operations.** Housekeeping measures and solvent cleaning operations (hand-wipe cleaning, spray gun cleaning, and flush cleaning) subject to this Section shall comply with the requirements and exemptions contained in 40 CFR Section 63.744. Housekeeping measures and solvent cleaning operations shall be considered in compliance when the requirements in 40 CFR Section 63.749(c) are met. Housekeeping measures and solvent cleaning operations subject to this Section are exempt from the requirements of OAC 252:100-39-42.

(5) **General standards.** The handling and transfer of primers, topcoats, specialty coatings, and chemical milling maskants to or from containers, tanks, vats, vessels, and piping systems shall be handled in a manner that minimizes spills.

(d) **Recordkeeping requirements.** The owner or operator of a facility subject to this Section shall submit to the Division Director or personnel of DEQ upon request reports detailing specific VOC sources; the quantity of coatings used for a specific time period; VOC content of each coating; capture and control efficiencies; and any other information pertinent to the calculation of VOC emissions. The data necessary to supply the requested information shall be retained by the owner or operator for a minimum of two years.