

**NATIONAL EMISSION STANDARDS FOR AEROSPACE MANUFACTURING AND
REWORK FACILITIES (SUBPART GG) – GUIDANCE DOCUMENT**

Rule Guidance

Fall 2016

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PURPOSE AND GOALS FOR GUIDANCE

This guidance addresses the National Emission Standards for Hazardous Air Pollutants for Aerospace Manufacturing and Rework Facilities (aerospace NESHAP), 40 CFR Part 63, Subpart GG. This document is intended for the use of the United States Environmental Protection Agency (EPA), state and local regulatory agency staff and regulated entities subject to the NESHAP and explains the intent of certain provisions. The discussion in this document is intended solely as guidance. It does not impose legally-binding requirements on the EPA, state regulators or the regulated industry. As new issues emerge on Subpart GG, this guidance will be updated at: <https://www.epa.gov/stationary-sources-air-pollution/aerospace-manufacturing-and-rework-facilities-national-emission>.

POLICY AND TECHNICAL CONTACTS

- Regulatory Contact: Kim Teal, (919) 541-5580
- Office of Enforcement and Compliance Assurance Contact: John Cox (202) 564-1395

SUBPART OVERVIEW

This subpart is intended to apply to only hazardous air pollutant (HAP) emissions. Specifically, organic HAP emissions from the following operations:

- Cleaning
- Depainting
- Primer application
- Topcoat application
- Specialty coating application
- Chemical milling maskant application
- Handling and storage of waste¹

This subpart also applies to the inorganic HAP emissions from the following operations:

- Depainting operations using dry media blasting
- Primer coating application operations using spray equipment
- Topcoat coating application operations using spray equipment
- Specialty coating application operations using spray equipment

¹ A waste does not contain organic HAP if it meets the criteria of non-HAP material in 63.742 (i.e., waste that contains no more than 0.1 percent by mass of any individual organic HAP that is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR §1910.1200(d)(4) (2011) (currently codified at Appendix A to 29 CFR §1910.1200—Health Hazard Criteria (Mandatory), §A.6.4), and no more than 1.0 percent by mass for any other individual HAP). Note that Section 63.742 of the regulations incorrectly specifies 29 CFR 1200(d)(4), a citation that will be updated in a future technical correction.

INDIVIDUAL SECTION GUIDANCE

Section 63.748(a)(2) – Standards: Handling and storage of waste.

This section states all waste that contains organic HAP should be stored in closed containers.

This requirement is only intended for HAP-containing waste that is not subject to the Resource Conservation and Recovery Act (RCRA) requirements in 40 CFR parts 260 through 268. Once a waste is determined to be a RCRA waste, it is not then or subsequently subject to the requirements in the aerospace NESHAP.

Furthermore, our intent is to clarify that a material is not a waste requiring disposal in closed containers:

- If it does not contain “free liquids” (as defined in 40 CFR 260.10)
- If it’s within containers or liners rendered “empty” (as defined in 40 CFR 261.7) such as residues remaining in tubes, bottles, cups etc.
- Until such time that it is no longer suitable for its intended purpose. For example, a tube of adhesive that is partially used but has now set up to the point it is no longer useable.

When the material becomes a waste it must be stored in a closed container no later than the end of the work shift.

Section 63. 753(a)(5) – Reporting Requirements.

This section states that if a source fails to meet an applicable standard, it must report the number of failures; date, time and duration of each failure; and a list of the affected sources or equipment with an estimate of the excess emissions as well as a description of the emission estimation methodology.

We did not provide specific methods for estimating excess emissions due to the diverse nature of affected sources and equipment in each of the facilities. We defer the estimation methodology to those most knowledgeable about the specifics of each facility. We assume that sources will be able to use readily available information, consistent with the compliance demonstrations, to estimate their excess emissions. One appropriate and familiar method for estimating emissions is the mass balance calculations, which are commonly used to demonstrate compliance for coating operations.

It is our intent that these requirements are to be met only where there was a numerical emission limit (e.g., a pounds/gallon (lb/gal) limit) as compared with a work practice standard (e.g., where a solvent-containing cloth might not have been placed in a closed container in a timely manner). This is consistent with the requirement to establish numerical emissions limits where we’re able to quantify the emissions and the discretion to establish work practice standards where it’s not feasible to quantify the emissions.