

**Surface Coating of Plastic Parts  
and Products MACT  
40 CFR Part 63 Subpart P (63.4480)  
(Proposed December 4, 2002)  
(Final April 19, 2004)**

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**Presented by  
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# Surface Coating of Plastic Parts and Products MACT Applicability

Your facility is subject to this rule if:

1. You employ 100 gallons or more of HAP containing coatings\* in the surface coating of plastic parts per year; and
2. Your facility is a Major Source of HAPs\*\*

*\*Do not include coatings that satisfy the definition of “Non-HAP Coatings.” “Non-HAP Coatings” means a coating that contains no more than 0.1 % by mass of any organic HAP that is an OSHA-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) and no more than 1.0 % by mass for any other HAP.*

*\*\*“Major Source of HAPs” means any stationary source or group of stationary sources that emits or has the potential to emit 10 tpy or more of any single HAP or 25 tpy or more of a combination of HAP.*

# Surface Coating of Plastic Parts and Products MACT Exemptions



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The following surface coating operations are exempt from this rule:

1. Operations that use only coatings, thinners and other additives, and cleaning materials that contain no “organic HAP,” as determined by § 63.3941(a).
2. Operations at research or laboratory facilities, conducted for janitorial, building, and facility maintenance operations, or at hobby shops that are operated for noncommercial purposes.
3. Coating of plastic parts and products at installations owned/operated by the US military or NASA or coating of military munitions manufactured by or for the US military.
4. Coating where plastic is extruded onto plastic parts or products to form a coating.
5. Coating of magnet wire.

# Surface Coating of Plastic Parts and Products MACT

## Possible Additional Exemptions

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Under some circumstances, coating of plastic components subject to the following MACT standards may be exempt:

Subpart WWWW – Reinforced Plastics Composites Production

Subpart JJ – Wood Furniture Manufacturing Operations

Subpart NNNN – Surface Coating of Large Appliances

Subpart RRRR – Surface Coating of Metal Furniture

Subpart QQQQ – Surface Coating of Wood Building Products

Subpart GG – Aerospace Manufacturing and Rework Facilities

Subpart II – Shipbuilding and Ship Repair (Surface Coating)

Subpart JJJJ – Paper and Other Web Coating

Subpart VVVV – Boat Manufacturing



# Surface Coating of Plastic Parts and Products MACT

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What equipment or activities are regulated by this rule?

1. Coating operations;

*“Coating Operation” means equipment used to apply cleaning materials to a substrate to prepare it for coating application (surface preparation) or remove dried coating; to apply coating to a substrate (coating application) and to dry or cure the coating after application; or to clean coating operation equipment (equipment cleaning).*

2. Storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

3. Manual or automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

4. Storage containers and manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

# Surface Coating of Plastic Parts and Products MACT Emission Limitations

Coating Use Category	Emission Limitation (lbs organic HAP/lb coating solids)	
	Existing Sources	New or Reconstructed Sources
General Use	0.16	0.16
Automotive Lamp	0.45	0.26
Thermoplastic Olefin (TPO)	0.26	0.22
Assembled On-Road Vehicle	1.34	1.34

# Surface Coating of Plastics Parts and Products MACT Compliance Options

## ➤ Use Compliance Coatings

- ❖ Each coating must satisfy the organic HAP limits in § 63.4490; and
- ❖ Each thinner and/or other additive, and cleaning material used must contain no organic HAP

## ➤ Emission Rate w/o Add-on Controls

- ❖ The organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit in § 63.4490 calculated as a rolling 12-month emission rate and determined on a monthly basis

## ➤ Emission Rate with Add-on Controls

- ❖ The organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit in § 63.4490 calculated as a rolling 12-month emission rate and determined on a monthly basis
- ❖ Satisfy operating restrictions identified in Table 1 of this rule
- ❖ Conduct capture and control efficiency testing

# Surface Coating of Plastic Parts and Products MACT

## Compliance Dates for Existing Sources

(i.e., sources that commenced operation before December 4, 2002)

- Initial Notification:
  - ❖ April 19, 2005
- Beginning of Initial 12-Month Compliance Period:
  - ❖ April 20, 2007
- Performance Testing for Add-on Controls:
  - ❖ April 19, 2007
- End of Initial 12-Month Compliance Period:
  - ❖ April 30, 2008

# Surface Coating of Plastic Parts and Products MACT

## Compliance Dates for New or Reconstructed Sources (i.e., sources that commenced operation before December 4, 2002)

- **Initial Notification:**
  - ❖ August 17, 2004 or 120 days after start-up (whichever is later)
- **Beginning of Initial 12-Month Compliance Period:**
  - ❖ April 20, 2004 for sources that started up before April 19, 2004; or
  - ❖ Upon start-up for sources starting up after April 19, 2004
- **Performance Testing for Add-On Controls:**
  - ❖ October 16, 2004 for sources that started up before April 19, 2004; or
  - ❖ 180 days after start-up for sources starting up after April 19, 2004
- **End of Initial 12-Month Compliance Period:**
  - ❖ April 30, 2005 for sources that started up before April 19, 2004; or
  - ❖ One year after start-up for sources starting up after April 19, 2004

# Surface Coating of Plastic Parts and Products MACT

## Compliance Dates for Existing Sources Transitioning from Minor to Major HAP Source Status

### ➤ Initial Notification:

- ❖ April 19, 2005 or 120 days after becoming a major (whichever is later)?

### ➤ Beginning of Initial 12-Month Compliance Period:

- ❖ April 20, 2007 or 1 year after becoming a major (whichever is later)

### ➤ Performance Testing for Add-On Controls:

- ❖ April 19, 2007 or 1 year after becoming a major (whichever is later)?

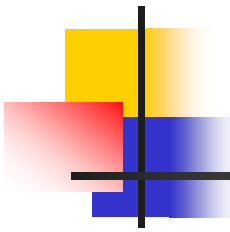
### ➤ End of Initial 12-Month Compliance Period:

- ❖ April 30, 2008 or 2 years after becoming a major (whichever is later)

# Surface Coating of Plastic Parts and Products MACT

## Compliance Dates for New or Reconstructed Sources Transitioning from Minor to Major HAP Source Status

- Initial Notification
  - ❖ August 17, 2004 or 120 days after becoming a major (whichever is later)?
- Beginning of Initial 12-Month Compliance Period
  - ❖ April 20, 2004 or upon start-up (whichever is later)
- Performance Testing for Add-On Controls
  - ❖ October 16, 2004 for sources that started up before April 19, 2004; or
  - ❖ 180 days after start-up for sources starting up after April 19, 2004?
- End of Initial 12-Month Compliance Period
  - ❖ April 30, 2005 or 1 year after start-up



# Surface Coating of Plastic Parts and Products MACT and Products MACT Things-To-Look-Out-For

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- This rule provides operators of catalytic oxidizers 2 ways to comply. One has pitfalls.
- This rule provides flexibility for sources that coat both plastic and metal.