



IOWA DEPARTMENT OF NATURAL RESOURCES

Air Quality News

Environmental Services

Air Toxics Update: Surface Coating and Coating Manufacturing

EPA recently updated several federal regulations for hazardous air pollutants (also known as HAP or air toxics). EPA's actions address the Risk and Technology Review (RTR) required under the U.S. Clean Air Act.

This is the eighth in a series of articles covering EPA's updates to air toxics regulations (also known as National Emission Standards for Hazardous Air Pollutants or NESHAP). The changes update individual subparts of 40 Code of Federal Regulations (CFR) Part 63. Find background on the NESHAP RTR requirements and a general overview of the recent changes in the [Air Toxics Update](#). In the following weeks, Iowa DNR will continue to address changes to specific regulations affecting Iowa businesses.

Updates to the Standards for Surface Coating and Coating Manufacturing

On July 8, 2020, EPA published final [NESHAP RTR amendments](#) for three different source categories covering surface coating activities. These source categories include: Automobiles and Light-Duty Trucks (Subpart LLLL); Miscellaneous Metal Parts and Products (Subpart MMMM); and Plastic Parts and Products (Subpart PPPP). Facilities in these categories generally apply coatings with spray guns and dip tanks and also have associated activities including surface preparation, cleaning, mixing, and storage. The NESHAP requirements are intended to reduce HAP emissions from chemicals such as toluene, xylene, and naphthalene.

Iowa DNR estimates that 31 Iowa facilities are currently subject to the NESHAP for Miscellaneous Metal Parts and Products, and that 12 facilities are currently subject to the NESHAP for Plastic Parts and Products. At this time, Iowa DNR is not aware of any facilities affected by the NESHAP for Automobiles and Light Duty Trucks

Additionally, on August 14, 2020, EPA published the final [NESHAP RTR](#) for Miscellaneous Coating Manufacturing (Subpart HHHHH). The Miscellaneous Coating Manufacturing (MCM) source category includes manufacturing of paints, inks, and adhesives. The NESHAP requirements are designed to reduce HAP emitted from MCM facilities, such as toluene and xylene. DNR estimates that one Iowa facility is currently subject to the NESHAP.

New Requirements

Surface Coating: The changes to the standards for the three source categories for surface coating include, but are not limited to, the following:

- **RTR Assessment:** Following the RTR, EPA determined that risks from each of the source categories are acceptable and that no new cost-effective controls are available. EPA did not change any standards as a result of the RTR.
- **Revised Testing:** For facilities using the add-on-emissions controls option, additional performance testing is required every five years to re-establish operating limits for the control equipment. Previously, only an initial test was required. EPA also added optional testing methods to be used under certain conditions.

- **New List for Materials Considered Carcinogenic:** EPA removed a reference to OSHA-defined carcinogens and replaced it with a table in each subpart that lists the HAP that must be included in calculating total organic HAP content of a coating material if present at 0.1 percent or greater by mass.
- **Startup, Shutdown, and Malfunction:** The amendments revise and clarify regulatory provisions related to emissions during periods of startup, shutdown and malfunction (SSM) to indicate that the standards apply continuously, including during periods of SSM.
- **Electronic Reporting:** The updated standards also include electronic reporting of compliance reports and performance test results and reports through EPA's Central Data Exchange, using the Compliance and Emissions Data Reporting Interface (CEDRI). **Note:** Affected facilities must also comply with Iowa requirements for submitting reports, as specified in Iowa administrative rules or in air permits.

Miscellaneous Coating Manufacturing (MCM): The changes to the standards for the MCM source category include, but are not limited to, the following:

- **RTR Assessment:** Following the RTR, EPA determined that risks from the MCM source category are acceptable and that no new cost-effective controls are available. EPA did not change any standards as a result of the RTR.
- **Revised Testing:** For facilities using the add-on-emissions controls option, additional performance testing is required every five years to re-establish operating limits for the control equipment. Previously, only an initial test was required. EPA also added optional testing methods to be used under certain conditions.
- **List of HAPs for Coating Materials:** EPA removed a reference to OSHA-defined carcinogens and replaced it with a table (Table 11) that lists organic HAP that must be included in calculating total organic HAP content of a coating material (e., for demonstrating compliance with the weight-percent HAP limit alternative).
- **Startup, Shutdown, and Malfunction:** The amendments revise and clarify regulatory provisions related to emissions during periods of startup, shutdown and malfunction (SSM) to indicate that the standards apply continuously, including periods of SSM.
- **Electronic Reporting:** The updated standards also include electronic reporting of compliance reports and performance test results and reports through EPA's Central Data Exchange, using CEDRI. **(Note:** Affected facilities must also comply with Iowa requirements for submitting reports, as specified in Iowa administrative rules or in air permits.

Compliance Deadlines

- **Surface Coating:** For all affected sources in the three source categories, the compliance date is Jan. 5, 2021, with the exception of the electronic format for submitting semiannual compliance reports. For the electronic format for submitting semiannual compliance reports, both existing and new (or reconstructed) affected sources must comply within one year after the electronic reporting templates are available on CEDRI, or by July 8, 2021, whichever is later.
- **Miscellaneous Coating Manufacturing (MCM):** For all affected MCM sources that commenced construction or reconstruction on or before Sept. 4, 2019, compliance with the new requirements, including those for SSM, must be achieved by Aug. 14, 2023 (or upon startup, whichever is later). For all affected sources that commenced construction or reconstruction after Sept. 4, 2019, compliance was required by Aug. 14, 2020 (or

upon startup, whichever is later), with the exception of electronic reporting. All affected sources must comply with the new electronic reporting provisions by Aug. 14, 2023.

For more information:

- [Surface Coating](#)
- [MCM](#)

Implementation in Iowa

DNR plans to begin rulemaking to incorporate the updated standards—which will give DNR authority to administer the rules. In the interim, EPA will implement the NESHAP RTR changes. DNR is available to answer questions about the new amendments and will work with EPA Region 7 to assist facilities.

DNR staff will review the changes and contact facilities which we know are impacted and have substantively different requirements in their permits from the updated NESHAP. However, an affected facility should carefully review the updated NESHAP to be aware of any new requirements and compliance dates. An affected facility must still comply with the NESHAP RTR requirements even if the requirements are not included in an Iowa air permit.

In the upcoming weeks, please keep an eye on your inbox for **Air Toxics** updates on other individual source categories.

If you have technical questions about the NESHAP changes, please contact Michael Hermsen (email: michael.hermsen@dnr.iowa.gov; phone: 515-725-9577). For general questions, please contact Christine Paulson (email: christine.paulson@dnr.iowa.gov; phone: 515-725-9510).

A note on Iowa DNR and COVID-19

The Iowa Department of Natural Resources is working with state and local officials to reduce the spread of COVID-19 and has transitioned employees to work remotely. DNR offices are closed to the public during this time and only available by appointment.

In another effort to further reduce the spread of COVID-19, the DNR is encouraging the use of the online services for submitting applications, payments and other daily tasks and interaction with DNR staff.

- [Full list of DNR's online services](#)
- [Up-to-date information on DNR services, facilities and events impacted by COVID-19](#)
- [Technical information for regulated businesses in regards to COVID-19](#)

We thank you for your patience and flexibility during this time. If you need to contact DNR staff you can reach them by email or phone or by calling 515-725-8200

DNR's Air Quality News listserve is targeted to the regulated public and consultants to deliver timely regulatory news, program updates, and technical guidance to your email. If you have difficulty, please contact DNR's Wendy Walker at 515-725-9570.