

Paint Stripping Source Category

Paint stripping operations is another source category that we are required to regulate under section 112(d) of the Clean Air Act. Paint stripping is defined, for purposes of regulation, as the removal of paint or any other coating using HAP-containing chemicals. Methylene chloride is the HAP that predominates in this type of operation. Major sources of paint stripping include facilities that use methylene chloride to remove coatings from furniture, aircraft, metal parts or any other type of component for purposes of preparing the surface for a new coating. The purpose of this section is to describe how we have already addressed the paint stripping source category and to explain our future regulatory activities aimed at addressing area sources.

In order to identify major sources of paint stripping operations we engaged in a number of activities that helped us obtain information about the nature of the paint removal processes at a given facility and the associated HAP emissions. This process included searching emissions databases, such as the Atmospheric Information Retrieval System (AIRS) to find facilities with methylene chloride and any other types of facilities that perform paint removal. Even though we were able to identify many facilities with methylene chloride emissions, we found no unregulated major sources through this database that would be affected by a paint stripping NESHAP. We identified several major source facilities that perform paint removal operations that are already regulated under other NESHAP such as Aerospace and Wood Furniture.

Our next effort consisted of reviewing the air permit and related information of potential paint stripping facilities with HAP emissions in several States. We requested the States of North Carolina, California, New York, Illinois, Texas and Florida to provide us with lists of facilities that emit methylene chloride or any other HAP emissions associated with paint removal processes. These States were a representative subset with relatively large number of facilities with reported methylene chloride emissions. We also considered, as part of this search, paint stripping operations at sources that would be major due to collocation. Consistent with our findings from searching the AIRS database, our information gathering and permit review effort with these States identified no major sources that would be potentially affected by a paint stripping NESHAP. Even though we identified several sources with paint stripping operations, they were

either already covered by another NESHAP, or were not major sources.

Our conclusion from these activities is that there are currently no major sources of paint stripping that are not already subject to other NESHAP. As a result, we do not plan to promulgate a separate NESHAP for major sources in the paint stripping category. Paint stripping is a process that is invariably part of a larger process whose purpose is to prepare a surface for a new coating. The process of removing the old coat, preparing the surface, and applying a new one is, as we found, regulated by other NESHAP. These regulations have already helped us to significantly reduce emissions of methylene chloride from major sources and satisfy our obligation under 112(d) to set standards for major sources in the paint stripping source category.

There are however, thousands of small paint stripping facilities that are not major sources but that emit HAP emissions. These small facilities will be studied and potentially subject to regulation in the future as part the Urban Air Toxics Strategy. In considering additional regulation, EPA will also continue to review whether there are other types of major sources in the paint stripping category that should be subject to standards.