

INTRODUCTION

This document is designed to present the most frequently asked questions regarding the Data Collection Questionnaire designed for the Miscellaneous Metal Parts & Products (MMPP) Surface Coating MACT Source Category. This document will be updated periodically and posted to the MMPP web site (http://www.epa.gov/ttn/uatw/coat/misc/misc_met.html) as soon as practical. The format of this document is to provide the questions and answers for general questions first, then to address questions for each of the individual forms in order (Form A, Form B, etc.). If you have additional questions that are not included in this list, please contact the appropriate person listed in the first question, below.

Who should I contact if I still have questions?

<u>Contact Person</u>	<u>E-mail</u>	<u>Telephone</u>	<u>FAX</u>
For questions regarding how to fill out this questionnaire, contact:			
George Woodall	gwoodall@rtp.pes.com	(919) 941-0333	(919) 941-0234

For any other questions, you may contact either of the people listed below:

Bruce Moore	moore.bruce@epa.gov	(919) 541-5460	(919) 541-5689
Kim Teal	teal.kim@epa.gov	(919) 541-5580	(919) 541-5689

The preferred method of contact is via e-mail, then FAX, and lastly by phone.

GENERAL QUESTIONS

What are the Data Collection Questionnaire forms?

The Data Collection Questionnaire was developed by EPA to gather information specific to surface coating operations. It is EPA's belief that these forms will be easier for respondents and will provide more useful information to EPA because it is tailored to the industries performing surface coating.

Do I have to fill out both Enclosure 1 and Enclosure 8 of the Section 114 letter?

No. You have a choice of filling out either Enclosure 1 (the Data Collection Questionnaire) or Enclosure 8 (the OMB-approved, generic questionnaire). Again, EPA believes that Enclosure 1 will be more appropriate for describing your facility.

Why did I receive these forms?

Your facility has been identified as one of over 10,000 facilities that are potentially subject to new EPA Regulations covering surface coating. The questionnaire forms in this package were designed specifically for gathering information for the development of Maximum Achievable

Frequently Asked Questions (FAQs) for the MMPP Data Collection Questionnaire

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Updated: November 30, 1998

Control Technology (MACT) Standards for the emissions of Hazardous Air Pollutants (HAPs) from the Miscellaneous Metal Parts and Products (MMPP) Surface Coating source category. MMPP is one of nine surface coating categories which are developing these regulations, as required under Section 112 of the Clean Air Act (CAA) as amended in 1990. These regulations are expected to be promulgated in November of the year 2000. The source categories that are on this schedule are listed below. The coatings in six of these categories (including MMPP) will also be subject to the regulations for Volatile Organic Compounds (VOCs) being developed under Section 183(e) of the CAA. Definitions for these categories are provided later in these instructions.

- Automobile and Light-duty Trucks*
- Fabric
- Large Appliances*
- Metal Can
- Metal Coil
- Metal Furniture*
- Miscellaneous Metal Parts and Products*
- Plastic Parts*
- Wood Building Products*

* Indicates source categories also subject to Section 183(e) requirements.

Why should I respond to this survey?

The Data Collection Questionnaire is the best opportunity for industries that will be regulated under these requirements to describe their surface coating operations and ancillary activities so that the regulations will be technically effective, logistically workable, and cost effective. It is the hope of the EPA that all targeted industries will respond in the time allotted, with information that will allow EPA to develop regulations that make sense to the industries being regulated.

To Whom were the Questionnaire Packets Sent?

The mailing list was developed following an analysis of a Screening Survey that was sent to facilities listed in databases from the EPA and State and Local agencies, from the mailing lists of trade associations, and from individual companies that have been members of the stakeholder group for this project. The Questionnaire packets have been addressed, where possible, to the Corporate Environmental Official, and not the individual facilities for several purposes:

- 1) to alert corporate owners of the data collection effort and allow them the opportunity to provide a coordinated response from all of their facilities;
- 2) to reduce the amount of mailing to individual facilities; and
- 3) to ensure that individual facilities are not missed.

How was the Full Survey mailing list developed?

The results from the Screening Survey were analyzed to include all Major and Synthetic Minor sources that also indicated that MMPP surface coating was performed at the facility or no indication of any source category was provided. Also added to that list were Minor/Area sources and facilities with responses that did not indicate any source categories, and which emitted 10 or more tons of HAPs from coating operations. If emissions were not indicated or were below the threshold level and the facility had coating usage of greater than 2,000 gallons or 10 tons, they were also added. Facilities were also added to the list from trade associations that did not provide their lists of facilities for inclusion to the Screening Survey mailing list.

How do I fill out these forms?

Responses for individual facilities may be completed at the facilities themselves or from the corporate level. Regardless of how the forms are completed, there are some general guidelines that should be followed.

- Each response (one per facility/plant) should have a unique Facility Tracking Number. The initial Facility Tracking Number can be found in Enclosure 6 to the Section 114 letter sent with this Questionnaire Packet. (See next question for details.)
- Each copy of each page of a Form should have the Facility Tracking Number at the top of the page.

Will there be a way to report this information electronically?

Yes. The project team is in the final stages of developing an Access® database for data entry of the responses to the Data Collection Questionnaire. A subset of the entire database for the facilities included on the list in Enclosure 6 will be made available to the corporate owners that received the questionnaire. This electronic version of the Data Collection Questionnaire was developed to facilitate easier and more accurate data entry for both the facility and the EPA. A future announcement on the method to acquire a copy of your database will soon be posted to the MMPP web site.

What if I am reporting for more than one facility?

If you have additional facilities not listed in Enclosure 6 to the Section 114 letter or for which you do not have a unique Facility Tracking Number (e.g., MMPP-0001), contact Ms. Sharnay Torrance of PES, Inc., preferably via e-mail (storranc@rtp.pes.com), or FAX (919)9410-0234, or phone (919)941-0333 ext. 285 for additional Facility Tracking Numbers.

How do these forms fit together?

The questionnaire consists of several inter-related forms.

- Form A (Facility General Information); one form for each response.
- Form B (Material Data); one form is needed for each material (or group of similar materials) used in the facility that can contribute to the emissions of VOC or HAP. Although it is expected that most materials will be coatings, the information requested on Form B includes materials used in surface preparation, equipment cleaning, etc. The other forms will reference the material identification number that you assign each of your materials or groups of materials.
- Form C (Control Devices); one form is needed for each control device used at your facility to control emissions from surface coating.
- Form D-1 (Coating Application Equipment); one form for each coating application unit/line. Coating application units/lines may be described by one form for a one-coat system, or may require several copies to describe the equipment which applies multiple coats on a single dedicated line.
- Form D-2 (Coating Systems); one form for each “system” of coatings used and the parts that the system is used to coat. Multiple copies of each page of this two-page form may be required for complex operations and job shops.
- Form D-3 (Coating Equipment/Systems Cross Reference); correlates the equipment to the coating systems used within them.
- Form E (Surface Preparation); one form is needed for each unique surface preparation activity (preparation of parts or products prior to surface coating). If none occur at your facility, do not fill-out.
- Form F (Waste and Wastewater); one form for each response/facility. Use this form to describe the waste and wastewater handling throughout your facility. Fill out this form only if you have estimated emissions from these areas previously.
- Form PPP (Plastic Parts and Products Surface Coating); this is provided to allow facilities that coat plastic parts/products on a coating line separate from the metal parts/products to provide that information on a set of forms more specific to plastic without having to duplicate the other information being requested in the other forms in this questionnaire packet.
- Comments Sheet; use copies of this form as necessary to provide any additional detail for any response on any form. The Comments Sheet is provided at the end of this questionnaire packet.

How do I fill out the forms if all I use are adhesives?

Please treat your adhesives as a coating; fill out a Form B (Material Data) for the adhesive, fill out a Form C (Control Device) if applicable, fill out Forms D1 through D3 to describe the application of the adhesive, and Forms E (Surface Preparation) and F (Waste Handling) if applicable.

How do I mark confidential information on these forms?

At the bottom of each form is a place for you to identify if Confidential Business Information (CBI) is included. If you indicate that CBI is included on the form, please list the item numbers containing CBI. Please refer to your cover letter and survey package for guidelines regarding CBI, and note that if you do not indicate that CBI is on a form, EPA will assume that the form contains no CBI.

Can I write additional details about my process in the margins of the forms?

Yes. We would prefer that you attach a Comments Sheet to provide any additional details; however, for a short comment it may be easier and more convenient to add a note in the margin next to the appropriate question.

Many State VOC RACT rules are defined by SIC Codes between 33XX to 39XX; will this be the same for the MMPP NESHAP?

It's pretty early to say how we'll spell out applicability, but our intention is to cover any metal coating operations that are NOT covered by any other surface coating MACT rules (e.g., metal furniture, metal coil, large appliances, etc.). Therefore, the applicability of the OTHER projects is a key determinant.

We previously submitted information for our facilities performing surface coating of Miscellaneous Metal parts. Your recent request dated 10/28/98 specifically requested additional information for a subset of these facilities (listed in Enclosure 6). This leads me to believe that you "screened out" the other facilities (an action that would be appropriate following a screening survey). However, I am confused by the request in the cover letter to also submit information for any other facilities not listed in Enclosure 6.

The statement you find confusing in the letter was placed there for certain companies that were added to our list late (in some cases their trade associations did not get us a mailing list until long after the Screening Survey) and for which we had no list of facilities or an incomplete list. Additionally, many of the screening survey responses were from individual facilities, and we were unsure whether or not we had a complete list of facilities for each corporate owner.

The criteria we used for selecting facilities from the Screening Survey included those facilities indicated as being in the MMPP source category (and those for which no indication of category was made), and were Major or Synthetic Minor sources. Facilities were also included if they did not meet those criteria (or those criteria were not indicated) and had coating emissions of greater than 10 tons/year, or had coating usage of greater than 2,000 gallons or 10 tons.

We do coat plastic parts and/or products but do not coat metal parts or products; how do we need to respond to this Survey?

Some facilities on the mailing list perform coating of plastic/metal composites, and others (most notably from the automotive parts industry) coat plastic parts exclusively but did not receive a survey for the Plastic Parts and Products (PPP) Surface Coating Source Category. In cases where any coating lines are coating plastic parts and products, use the Form PPP for those lines instead of the Forms D1 - D3, and use the other forms in the MMPP survey to provide the other information on the facility (Form A), materials used (Form B), control devices (Form C), surface preparation (Form E), and waste handling (Form F).

We do not coat metal parts or plastic pieces; how do we need to respond to this Survey?

If you do no coating of metal parts, fill in Form A (it can be found in Enclosure 1) and return it. On Form A, please indicate that your facility does no coating of metal parts, and any other information you feel is relevant on a Comments Sheet.

How do I classify my conversion coatings or phosphatizing?

Conversion coatings (including phosphatizing), which chemically alters the substrate before coating, should be reported on Form E as surface preparation and not on Form D2.

If I coat metal and plastic parts together on the same line, do I need to fill-out Form PPP?

No, if the metal and plastic parts are coated on the same coating line simultaneously you do not need to fill-out Form PPP. However, if the parts are coated separately, you must complete Form PPP for plastic parts coated at the facility.

Do you want information on coatings or surface preparation that does not emit any HAP or VOC?

Yes, if you have technology in your facility which meets your needs without emitting HAPs or VOCs it should be reported.

If a facility or a process line is scheduled to close before the drafting of the rule, should they still complete the questionnaire?

Yes. We are gathering information based on a snapshot of the industry. Conversely, we are not asking about any facilities that are under construction but will begin operation before the regulations are in place.

If a facility experienced a change late in 1997 (e.g., solvent borne to water borne coatings), will they be required to update the questionnaire once 1998 data becomes available?

No. As mentioned above, we are taking a snapshot of the industry. However, you can provide additional details (including the emission reductions anticipated) on a comments sheet for the facility and include that as a part of your response.

Are there any extensions being granted for responding to this Survey?

Please see if you can respond by the January 15 due date and contact either Bruce Moore or Kim Teal of the EPA (see contact information presented above) as the time draws nearer and it seems you will still not be able to meet that date.

FORM A

My company received several pre-printed copies of Form A, if information on the form is incorrect or incomplete should I correct it?

Yes, if any of the information provided to you on the pre-printed Form A is incorrect you should correct it.

When you ask for information about coating line modifications (Items A-4f and A-4g), do you want information regarding the last time a facility went through a New Source Review or when spray-guns were replaced?

We would like information about how often a change in major coating equipment takes place. This could include coating booth replacement, or changes in coating technologies (from solvent-borne to powder coating). Replacement of worn out parts (e.g., a spray gun) is not included in this definition of a modification, but a New Source Review is. This information will be used so that when scheduling for the final rule is set there will be as minimal an economic impact on the industry as possible.

Do you want me to identify all of the thousands of products I coat (Item A-5)?

No. In item A-5, please list the groups of products that you coat, along with their Standard Industrial Classification (SIC) or North American Industrial Classification System (NAICS) Code. You can group your products by SIC/NAICS Code or by any other method you deem appropriate. Grouping of products is also encouraged in Form D2, and the approach taken to grouping of products in Form A should be followed in Form D2; therefore, it may be advantageous to review Form D2 before completing item A-5.

What do I put for my “Surface Coating Category” on Form A, Item A-9?

This question is asking for the MACT standards to which your facility is applicable. For example, if your facility surface coats automobiles at an auto assembly plant, you would check the Auto and Light-Duty Truck category; if you also coats auto parts on a separate coating line, you should also check the box for MMPP. If, however, you coat automobile and/or light-duty truck parts but not in an assembly plant, you would check the box for MMPP only. Category descriptions are provided in the Definitions section of the General Instructions. Check all boxes for parts and products which are covered in an existing MACT category or are anticipated to be covered in a future MACT.

What if 1997 is not a representative year for my facility?

In item A-8, please indicate a representative year for your facility. If 1997 was unusual for some reason (for example, you spent 6 months off-line while a modification was being made), then provide a representative year and attach a Comments Sheet explaining the situation.

FORM B

How do I fill out Form B for a multi-component coating?

As an example, consider a coating with a thinner and a catalyst that must be added prior to use. Complete a Form B for the thinner (Material ID Number MN-100) and a separate Form B for the catalyst (MN-200) as they are supplied to you. You will then define the multi-component coating under Form D2, item D2-3, indicating the amount of each component used within a coating system (see definitions and instructions to Form D2 for more discussion of coating systems).

Can I just send you a spreadsheet or a printout with the material data you are requesting?

No. It is essential for our data entry and quality control purposes that you fill out Form B. You may provide printouts if the format of the printout exactly matches that of Form B.

Can I group materials?

The option is being given to respondents to group like materials (e.g., different color coatings with similar VOC and HAP content), and report information on the grouped materials on a single Form B. However, there are some limitations on which materials may be grouped with one another.

- All materials within a group must have a similar formulation, not varying from one to another by more than 10% in Total VOC or 10% in Total HAP.
- Only materials of the same type can be grouped together (e.g., Coatings/Coating Components separate from Cleaning Solvents and Thinning Solvents).

- Only coatings of the same resin-type or coating technology may be grouped together.
- All materials in the group must use the same Units of Measure (either mass units or volume units) or be converted prior to being combined.
- Details given as ranges, such as the density of the product, weight-percent or volume-percent VOC, etc., should not vary by more than 10% from one another for those values (either the minimum or the maximum) from other products in the group. The absolute minimum and maximum values for products in the group should be entered (i.e., enter the lowest minimum and the highest maximum, taking into consideration the 10% difference stated in the previous sentence).
- Provide individual product-specific details (e.g., manufacturers, stock numbers, etc.) on a Comment Sheet for each product being grouped and enter "See Comments" for those items on Form B.

Can I group materials if the speciated components are not identical?

Yes. However, a group of materials or a group of coatings must still vary by no more than 10 percent in total HAP and no more than 10 percent in total VOC (weight percent comparisons made between individual products); see the "Rules for Grouping." If the member products of a group of coatings contain different speciated components, you must list all of the components that appear in the group of coatings; provide a volume-weighted average weight percent content for each component for all components that make up at least one percent of that volume-weighted average.

For example, Product A contains 15% toluene, Product B contains 23% xylene and 0.7% methanol, and Product C contains 40% methyl ethyl ketone; all three products otherwise meet the other rules for grouping. You have the choice of combining Products A and B or Product B and C; however, since the individual weight percent of total HAPs between Product A and Product C exceeds 10% of each products total weight, you cannot combine these products into the same group. Let us assume that you choose to combine Products A and B, and you used 1,000 pounds of Product A and 500 pounds of Product B in 1997. These products may be grouped and reported as follows:

Average Total HAP content = $[(1000 \text{ pounds} \times 0.15) + (500 \text{ pounds} \times 0.237)] / 1500 \text{ pounds}$
= $(150 + 118.5)/1500 = 0.179$ (or 17.9%)
Toluene content for group = pounds toluene/total pounds products = $150/1500 = 10\%$
Xylene content for group = pounds xylene/total pounds products = $(0.23 \times 500)/1500 = 7.7\%$

Methanol content does not need to be reported (less than 1% of product weight in any product) but should be listed as a trace component on a Comments Sheet for this group of products.

FORM C

How do I fill out Form C for a filter on a spray booth?

You don't. A filter on a spray booth (or any other method employed to capture particulate matter and over spray from a coating operation) is better handled on Form D1. Item D1-3 provides a data column for you to identify the type of particulate matter or over spray control used in each of your spray booths. Form C should be used for any stand-alone, add-on control devices (for example, incinerators or carbon adsorbers).

Should we list VOC and HAP separately for control device efficiency or will the EPA assume that a control device for VOC will also control volatile HAPs?

Unless you have information to the contrary (please provide the details on Form C and Comments Sheets), that is the assumption that EPA will adopt.

FORM D1

What is the difference between venting to the building interior versus venting to the atmosphere?

This question applies to several items where the forms are asking about the fate of emission vent streams. If the vent stream is released inside the building, the assumption is that the vent stream will eventually be released to the atmosphere. By checking "vent to atmosphere," you are indicating that the vent stream is routed directly to the atmosphere.

FORM D2

Why is EPA looking for coating-specific information and why use the "coating system" approach?

EPA will be analyzing responses to this survey to determine, among other things, the lowest emitting primers, base coats, top coats, etc. In this analysis, EPA wants to avoid choosing the low-emitting options in each class and have them not be compatible with one another, or to have a low-emitting set of options specified that is incompatible with a product. It is for this reason that EPA is asking for information about coating systems, with components that are compatible with one another.

Could you please clarify the difference between coating technology and coating type. Coating technology is defined, but coating type is not.

Coating types are the more general classifications of coating, such as primer, base coat, color coat, clear coat, top coat, etc.

Are there any guidelines for grouping parts on Form D2?

Basically, any products can be grouped that are given the same type of coating, using the same application technique, and have the same set of coating-related performance requirements. For example, a facility paints the same part for 5 different final products; in such a case grouping is allowed. In another example, a plant paints things that are truly miscellaneous and may paint 15-40 different parts on one line at the same time; this would also be appropriate for grouping of those products.

FORM F

Do you only want waste information for coating, or for the entire facility?

We want one Form F for the entire facility, and to report only for waste and waste water associated with activities related to coating operations, if possible. The instructions were somewhat vague on this point, but you are not being required to gather information on wastes and waste water that you have not been required to gather in the past. If you have never gone through such an exercise, EPA is not requiring you to do so for this effort. If you have information that cannot be limited to only wastes/waste water generated from coating and coating-associated operations, then provide what information you have and provide the details of what information represents on a Comments Sheet for Form F.