

Can you comply?

New EPA rule will limit paints and adhesives used by small composite manufacturers

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In 2006, EPA is expected to propose a rule that will reduce emissions from *coatings* (i.e., paint or adhesive) applied to molded plastic and composite products by small composite manufacturers. The rule will also limit the use of solvents for cleaning parts prior to or following the application of paint or adhesive. The emissions being targeted in this rule are referred to as hazardous air pollutants (HAP). **We expect that the limits in this new rule will make illegal many of the paints and adhesives that the industry now uses.**

The rule is not expected to apply to the application of gel coat, patching or bonding compounds, or in-mold coating, or to the use of handheld non-refillable aerosol containers.

The new EPA plastic parts coating rule will specifically apply to *area sources*. (An area source is any plant that is not a *major source*. The Clean Air Act defines a major source as a plant that has the potential to emit 10 tons per year of any single HAP, or 25 tpy of any combination of HAP.) Unlike the EPA MACT rules for composite manufacturing and boat building, **this new plastic parts coating area source rule will apply to even the smallest composite manufacturers.**

EPA is expected to publish the final plastic parts coating area source rule in 2007. The compliance deadline for existing composite manufacturers would be 2010. The compliance deadline for any new composite manufacturing operations would be upon publication of the final rule.

Expected requirements of the rule

EPA published a MACT (major source) rule for the coating of plastic and composite products in 2004. The requirements of this rule for larger companies are expected to serve as EPA's starting point for development of the requirements for area sources. The industry and EPA are currently collecting and evaluating data to determine whether smaller companies are able to feasibly comply with the same requirements issued in the MACT rule for major sources, or whether EPA needs to relax some of the requirements for the area source rule based on infeasibility.

Most companies subject to the plastic and composite products coating MACT rule will comply by adopting the following measures:

- **Coatings applied to molded composite products will contain no more than 0.16 pound organic Hazardous Air Pollutant (HAP) per pound of coating solid.** *Coating* means a material applied to a substrate for decorative, protective, or functional purposes. Such materials include, but are not limited to, paints, sealants, liquid plastic coatings, caulks, inks, adhesives, and maskants. The *HAP* most likely to be encountered in our industry include methanol, MEK, MIBK, MMA, MDI, TDI, styrene, xylene, ethylbenzene and toluene; the complete HAP list is available at www.epa.gov/ttn/atw/orig189.html.

- **Thinners and other additives, and cleaning materials used in conjunction with the application of paint or adhesive to molded composite products, will contain no HAP.** *Cleaning material* means a solvent used to remove contaminants and other materials, such as dirt, grease, oil, and dried or wet coating (*e.g.*, depainting), from a substrate before or after coating application or from equipment associated with a coating operation, such as spray booths, spray guns, racks, tanks, and hangers. It includes any cleaning material used on substrates or equipment or both.
- **All HAP-containing coatings, thinners and other additives, cleaning materials, and waste materials will be stored in closed containers. Conveyance of these materials from one location to another will be in closed containers or pipes. Mixing vessels will be kept closed except when adding to, removing, or mixing the contents.**

Can you comply with the expected requirements?

Preliminary data from shops subject to the MACT standard suggest that for many companies the majority of coatings currently in use will require reformulation to comply, and that HAP levels can easily exceed ten times the MACT limit. While we believe reformulation will be achievable for the coatings and products of major sources, we do not know whether the same can be said for smaller companies.

ACMA will work with EPA as the agency develops the rule for area sources. Our objective is a rule that achieves emission reductions while still allowing small companies to operate in a profitable and competitive way.

We need first to fully understand what paints, adhesives, solvents and cleaning materials are used by smaller composite manufacturers, and the HAP contents of these materials. ACMA is working with distributors to collect information in a survey of small composite manufacturers. We are also interviewing companies by phone, and are planning a series of plant tours to learn first-hand about coatings used in this industry.

If your company will be potentially subject to this new rule, please share your extensive knowledge and experience with us so that we can more effectively represent the industry to EPA. Our primary interest is ensuring that the rule allows you to continue using the materials you need and minimizing the burden associated with the regulatory requirements. Please contact me as shown below to learn how you can help. You can also contact me if you need more information about the rule, or you may contact EPA directly.

For more information:

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