

# Step-by-Step A Compliance Demonstration As-Purchased Compliant Coating Materials ' 63.3370(b)

**Overview:** This approach can be used if every coating purchased meets one of the MACT limits as-purchased and **no averaging across all coatings is needed** to demonstrate compliance.

In this approach, a facility needs to:

1. Identify all coatings and additives used in process.
2. Gather “NESHAP quality” data for each coating.
3. Demonstrate that each coating meets one of the applicable MACT limits.
4. Maintain monitoring and other compliance records.

### MACT limits

**Existing Affected Sources**

$$C_{ahi} \leq 0.04 \text{ kg HAP/kg coating}$$

**or**

$$H_{si} \leq 0.20 \text{ kg HAP/kg solids}$$

**New Affected Sources**

$$C_{ahi} \leq 0.016 \text{ kg HAP/kg coating}$$

**or**

$$H_{si} \leq 0.08 \text{ kg HAP/kg solids}$$

See separate listing of  
all variables

<b>Detailed Approach</b>	
<p><b>1. Identify all coatings and additives used in process.</b></p> <ul style="list-style-type: none"> <li>• Identify and maintain data sets for coating products and solvent or other additives</li> </ul>	
<p><b>2. Gather “NESHAP quality” data for each coating and additive, as-purchased, using one of the following methods:</b></p> <p><u>Method 311</u></p> <ul style="list-style-type: none"> <li>• Organic HAPs that are OSHA defined carcinogens present at <math>\geq 0.1\%</math> percent by weight.</li> <li>• Organic HAPs that are present at concentrations <math>\geq 1.0\%</math> by weight.</li> <li>• Express mass fraction of organic HAPs to four places after the decimal point.</li> <li>• Calculate total mass fraction of organic HAPs by summing the individual mass fractions and express to three places after the decimal point.</li> </ul> <p>OR</p> <p><u>Method 24</u></p> <ul style="list-style-type: none"> <li>• Determine the VOC as a mass fraction of non-aqueous volatile matter and substitute for organic HAP content.</li> <li>• Calculated solids content from measured volatile content, if needed.</li> </ul> <p>OR</p> <p><u>Formulation data</u></p> <ul style="list-style-type: none"> <li>• Provided by the manufacturer of the material.</li> <li>• Method 311 data takes precedence when available.</li> <li>• Formulation data must represent all organic HAP present <math>\geq 0.1\%</math> for OSHA defined carcinogens and <math>\geq 1.0\%</math> for other organic HAP compounds.</li> </ul>	<p>§63.3360(c)(1) and App. A of Part 63.</p> <p>§63.3360(c)(2), (d)(1) and App. A of Part 60.</p> <p>§63.3360(c)(3) and (d)(2)</p>

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Detailed Approach	
<p><b>3. Demonstrate that <u>each coating</u>, as-purchased, meets one of the applicable MACT limits.</b></p> <ul style="list-style-type: none"> <li>• The organic HAP content is determined on an as-purchased basis (item 2 of this detailed approach).</li> <li>• You are in compliance if the organic HAP content mass fraction on a coating materials basis or on a coating solids basis meet the applicable MACT limits.</li> <li>• The organic HAP content must be determined for each coating used in a month.</li> </ul>	<p>§63.3370(b)(1)</p> <p>§63.3370(b)(2)</p>
<p><b>4. Maintain monitoring and other compliance records.</b></p> <ul style="list-style-type: none"> <li>• Maintain records of organic HAP content data</li> <li>• Maintain records of volatile matter and solids content data</li> <li>• Maintain records of material usage, organic HAP usage, volatile matter usage, and coating solids usage and compliance demonstrations.</li> </ul>	<p>§63.3410(a)(1)(iii)</p> <p>§63.3410(a)(1)(iv)</p> <p>§63.3410(a)(1)(vi)</p>

**Credits:** This document was made possible through the efforts of the POWC Implementation Tool Development Partnership effort, an effort to bring together the regulated and regulatory community. It was through a group effort that this document was developed. The logo of the partner who was the lead for this tool is listed first below. To see a description of our partners or to get more information about the partnership effort, see <http://www.epa.gov/ttn/atw/powc/powcpg.html>

