MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

PART 6. EMISSION LIMITATIONS AND PROHIBITIONS— EXISTING SOURCES OF VOLATILE ORGANIC COMPOUND EMISSIONS

R 336.1610 Existing coating lines; emission of volatile organic compounds from existing automobile, light-duty truck, and other product and material coating lines.

Rule 610. (1) A person shall not cause or allow the emission of volatile organic compounds from the coating of automobiles and light-duty trucks, from any existing coating line, in excess of the applicable emission rates as shown in table 62.

(2) A person shall not cause or allow the emission of volatile organic compounds from the coating of any of the following, from an existing coating line, in excess of the applicable emission rates as shown in column A of table 63 or the equivalent emission rates in column B of table 63:

(a) Cans.

(b) Coils.

(c) Large appliances.

(d) Metal furniture.

(e) Magnet wire.

(f) The nonmetallic surfaces of fabrics, vinyl, or paper.

(3) Notwithstanding the provisions of subrule (2) of this rule and as an alternative to the allowable emission rate established by table 63, the existing paper coating lines at Fletcher paper company of Alpena may comply with the provisions of subrule (2) of this rule by achieving the following allowable volatile organic compound emission rates:

(a) 720 tons during calendar year 1993.

(b) 540 tons during calendar year 1994.

(c) 360 tons during calendar year 1995.

(d) After December 31, 1995, 180 tons per calendar year and 30 tons per calendar month.

(4) For the coating of paper in any existing coating line that is operated by precision coatings, inc., of Walled Lake or Fletcher paper company of Alpena, final compliance with the allowable emission rate for the coating of paper as established in subrule (2) of this rule shall be achieved according to the following schedule:

(a) For pecision coatings, inc., by October 19, 1991.

(b) For Fletcher paper company, by December 31, 1995.

(5) For each company that is referenced in subrule (4)of this rule, a person who is responsible for the operation of any existing coating line that is subject to the provisions of this rule shall comply with all of the following provisions:

(a) Submit to the cotm1ission an acceptable written program for compliance with the provisions of this rule or evidence of compliance with this rule. The evidence shall include all of the following information or other information that demonstrates compliance;

(i) Emission test data.

(ii) Material balance calculations.

(iii) Control equipment specifications.

(b) The compliance program that is required by subdivision (a) of this subrule shall be

submitted to the commission according to the following schedule

(i) For precision coatings, inc., by April 19, 1990.

(ii) For Fletcher paper company, by December 31, 1991.

(c) The compliance program that is required by subdivision (a) of this subrule shall include all of the following information:

(i) The method by which compliance with this rule shall be achieved.

(ii) A description of new equipment to be installed or modifications to existing equipment to be made.

(iii) A timetable that specifies, at a minimum, all of the following dates:

(A) The date or dates that equipment shall be ordered.

(B) The date or dates that construction, modification, or process changes shall begin.

(C) The date or dates that initial start-up of equipment shall begin.

(D) The date or dates that final compliance shall be achieved.

(6) Not later than 3 months after the effective date of this rule and thereafter, a person who is responsible for the operation of a coating line that is subject to this rule shall obtain current information and keep records that are necessary for the determination of compliance with the provisions of this rule, aa required in R 336.2041.

(7) For each coating line, compliance with the emission limits specified in table 62 and table 63 shall be based upon all of the following provisions:

(a) For prime coat operations that utilize an electrodeposition process in automobile and light-duty truck coating lines that are regulated pursuant to the provisions of table 62, compliance shall be based upon all coatings that belong to the same coating category that is used during each calendar month averaging period. For all other coatings, compliance shall be based upon the volume-weighted average of all coatings which belong to the same coating category and which are used during each calendar day averaging period. The commission may specifically authorize compliance to be based upon a longer averaging period which shall not be more than 1 calendar month.

(b) If coatings that belong to more than 1 coating category are used on the same coating line during the specified averaging period, then compliance shall be determined separately for each coating category.

(c) The information and records as required by subrule (6) of this rule.

(8) Compliance with the emission limits specified in this rule shall be determined using the applicable method described in the following subdivisions:

(a) For the prime - electrodeposition process and for the final repair emission limits specified in table 62, the method described in either R 336.2040(12)(a) if the coating line does not have an add-on emissions control device or R 336.2040(12)(b) if the coating line has 1 or more add-on emissions control devices.

(b) For the primer surfacer and topcoat emission limits specified in table 62, compliance shall be determined by the methodology described in the publication entitled "Protocol for Determining the Daily Volatile organic Compound Emission Rate of Automobile and Light-duty Truck Topcoat Operations," EPA-450/3-88-018, December, 1988, which is adopted by reference in these rules. A copy of this document may be inspected at the Lansing office of the air quality division of the department of natural resources. A copy of this document may be obtained from the Department of Natural Resources, Air Quality Division, P.O. Box 30028, Lansing, Michigan 48909, or the National Technical Information Service, 5285 Port Royal Road, Springfield, Virginia 22151, document no. PB-89152276, at a cost as of the time of adoption of these rules of

S25.00 each. References to topcoat operations in this publication shall also apply to primer surfacer lines, with the following added provisions:

(i) Unless specifically included in the adopted publication, when an anti-chip, color-in-prime, blackout, or spot primer coating is applied as part of either a primer surfacer or topcoat coating operation, the anti-chip, color-in-prime, blackout, or spot primer coating shall be included in the transfer efficiency tests for that coating operation, conducted according to section 18 or 19 of the adopted publication, and the transfer efficiency values in section 20 of the adopted publication shall not be used.

(ii) When spot primer is applied as part of a primer surfacer coating operation, the daily usage of spot primer, as calculated in section 8 of the adopted publication, may be derived from monthly usage of spot primer based upon the number of vehicles processed in the primer surfacer operation each day.

(c) F or the emission limits specified in column B of table 63, the method described in either R 336.2040(12)(e) if the coating line does not have an add-on emissions control device or R 36.2040(12)(f) if the coating line has l or more add-on emissions control devices.

(d) For the emission limits specified in column A of table 63, the method described in either R 336.2040(12)(a) if the coating line does not have an add-n emissions control device or R 336.2040(12)(b) if the coating line has 1 or more add-on emissions control devices.

(9) A person who is responsible for the following coating lines shall make a determination of compliance with these emission limits using the method specified in subrule (8) of this rule and shall submit a copy of this determination and supporting data to the commission by the following applicable specified date:

(a) For primer surfacer and topcoat coating lines, not later than 6 months after the effective date of this rule.

(b) For large appliance coating lines and metal furniture coating lines that are subject to the equivalent emission rates in column B of table 63, not later than 6 months after the effective date of this rule.

(10) The provisions of this rule, with the exception of the provisions in subrule (6) of this rule, shall not apply to any of the following:

(a) Coating lines which are within a stationary source that is located in any of the following counties and which have a combined actual emission rate of volatile organic compounds of less than or equal to 15 pounds per day:

(i) Kent.

(ii) Livingston.

(iii) Macomb.

(iv) Muskegon.

(v) Oakland.

(vi) Ottawa.

(vii) St. Clair.

(viii) Washtenaw.

(ix) Wayne.

If the combined actual emission rate is more than 15 pounds per day for a subsequent day, then the provisions of this rule shall thereafter permanently apply to these coating lines.

(b) Coating lines which are within a stationary source that is located in any county other than the counties identified in subdivision (a) of this subrule and which have a combined actual emission rate of volatile organic compounds of less than 100 pounds per day or 2,000 pounds per

month. If the combined actual emission rate equals or is more than 100 pounds per day for a subsequent day or 2,000 pounds per month for a subsequent month, then the provisions of this rule shall thereafter permanently apply to these coating lines.

(c) Low-use coatings that total 55 gallons or less per rolling 12-month period at a stationary source.

(11) The provisions of this rule, with the exception of the provisions of subrule (6) of this rule, do not apply to coating lines which were exempt, based upon the provisions of subrule (7)(a), from the provisions of R 336.1610 that were in effect on January 18, 1980, but which are now subject to the emission limit provisions of this rule, until 1 year after the effective date of this rule. A person who is responsible for a previously exempted coating line shall make a determination of compliance with the emission limits in this rule using the method specified in subrule (8) of this rule and shall submit a copy of this determination and supporting data to the commission not later than 1 year after the effective date of this rule.

(12) Between November l and March 31, a person may discontinue the operation of a natural gas-fired afterburner that is used to achieve compliance with the emission limits in this rule, unless the afterburner is used to achieve compliance with, or is required by, any of the following:

(a) Any other provision of these rules.

(b) A permit to install.

(c) A permit to operate.

(d) A voluntary agreement.

(e) A performance contract.

(f) A stipulation.

(g) An order of the commission.

(13) If the operation of a natural gas-fired afterburner is discontinued between November 1 and March 31 pursuant to the provisions of subrule (12) of this rule, both of the following provisions shall apply during this time period:

(a) All other provisions of this rule, except for the emission limits, shall remain in effect.

(b) All other measures that are used to comply with the emission limits in this rule between April l and October 31 shall continue to be used.

(14) Tables62 and 63 read as follows:

Table 62
Volatile organic compound emission limits for existing
automobile and light-duty truck coating lines

Coating category	Emission limit
1. Prime-electrodeposition process	1.2[1]
2. Primer surfacer[3]	14.9[2]
3. Topcoat[3]	14.9[2]
4. Final repair	4.8[1]

1. Pounds of volatile organic compounds per gallon of coating, minus water, as applied.

2. Pounds of volatile organic compounds per gallon of applied coating solids.
3. The primer surfacer or topcoat coating category would include an anti-chip, blackout, or spot primer coating if this coating is applied as part of the primer surfacer or topcoat coating operation.

Table 63
Volatile organic compound emission limits for existing coating lines

Coating category	Column A[1]	Column B[2]
A. Metallic surfaces		
1. Coating of cans		
(a) Sheet basecoat exterior and interior) and overvarnish; 2-piece can exterior (basecoat and overvarnish)	2.8	
(b) 2- and 3-piece can interior body spray; 2-piece can interior end (spray or roll coat)	4.2	
(c) 3-piece can side-seam	5.5	
(d) End sealing compound	3.7	
2. Coating of coils	2.6	
3. Coating of large appliances[3]	2.8	7.5
4. Coating of metal furniture[3]	3.0	8.4
5. Insulation of magnet wire	1.7	
B. Nonmetallic surfaces		
1. Coating of fabric	2.9	
2. Coating of vinyl[4]	3.8	
3. Coating of paper	2.9	

1. Pounds of volatile organic compounds emitted per gallon of coating, minus water, as applied.
2. Pounds of volatile organic compounds emitted per gallon of applied coating solids. The purpose of column B emission limits is to allow credit for transfer efficiencies greater than the baseline transfer efficiency. Note: commission approval of the transfer efficiency test method is required.
3. The allowable emission rate does not apply to coatings that are used for the repair of scratches and nicks.
4. For the Ford Mt. Clemens vinyl plant, the emission limit is 4.5 pounds of volatile organic compounds emitted per gallon of coating, minus water, as applied.

History: 1980 AACS; 1981 AACS; 1989 AACS; 1993 MR 4, Eff. Apr. 28, 1993.