



*National Air Compliance
Training Program*

Course Overview

- **Ozone and Human Health -- HAPS**
- **General Overview of Coating Ops**
- **Coating Composition & Emissions**
- **Pollution Prevention and Control**
- **Control Devices**
- **Rules & Regulations**
- **Inspections**
- **Calculations**

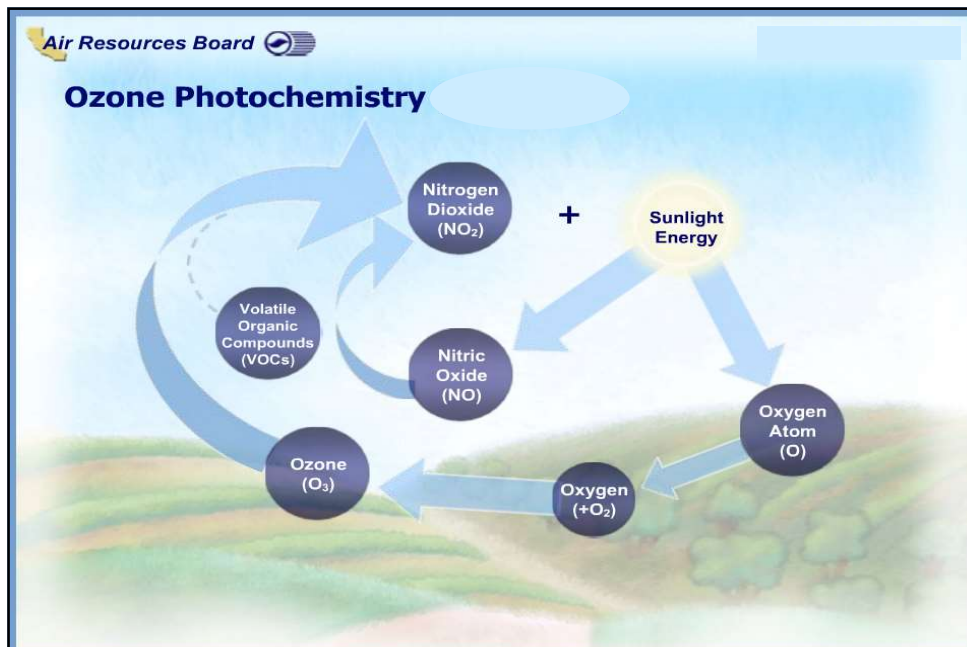
Why Are We Here? Ozone Causes:

Alveolar Injury Leading to Pulmonary Inflammation and Permanent Lung Damage

Respiratory Discomfort to Sensitive Populations

\$330 Million in Crop Damage Each Year

Damage & Failure of Paints and Rubber Parts



Coating Market Segments

- **OEM Product Coatings**
 - Automotive
 - Marine
 - Aircraft
 - Metal Containers
 - Appliances
 - Machinery and Equipment
 - Wood Furniture
 - Plastics
 - Coil
 - Overprint
- **Architectural Paints**
 - Interior
 - Exterior
- **Special Purpose**
 - Industrial Maintenance
 - Traffic Paint
 - Auto Refinish
- **Miscellaneous**
 - Roof, Tank, Deck
 - Concrete

Comparison of Automotive vs. Metal Parts

- **More Steps/Coats**
- **Basically One Type of Application**
- **Booth or Outdoors**
- **Looks Are Everything**
- **Less Steps**
- **Many Application Types**
- **Booth**
- **Corrosion Resistance**



What Are Metal Parts?

- **Motor Vehicle Parts and Accessories**
- **Recreational Vehicles**
- **Heavy Duty Trucks**
- **Railroad Cars**
- **Bicycles and Sporting Goods**
- **Extruded Aluminum**
- **Structural Components**
- **Medical Equipment**
- **Lawn and Garden Equipment**
- **Electronic Equipment**
- **Magnet Wire**
- **Steel Drums**
- **Industrial Machinery**
- **Metal Pipes**

What is a Coating?

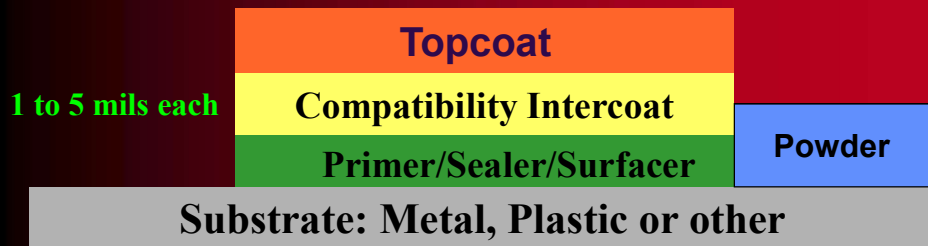
A thin film of organic material adhering to a mechanical device to protect it from corrosion or degradation by its environment. Consequently the color and texture of the surface are also altered.

What Kinds of Coating?

- Topcoat
- Undercoat
- Primer
- Sealer
- Surfacer



A Coating System



REFINISHING

Refinishing is the coating of vehicles, their exterior parts or components, or mobile equipment, including partial body collision repairs for the purpose of protection or beautification and which is subsequent to the coating applied at the manufacturers' assembly line.

--- EPA

Refinish Coating Manufacturers

• **BASF InMont**



• **DuPont**



• **PPG/Ditzler**



• **Sherwin Williams**



• **Glasurit**



• **Sikkens**



More than 65,000 Formulations for 13,000 Colors!!

Special Features of Auto Refinishing

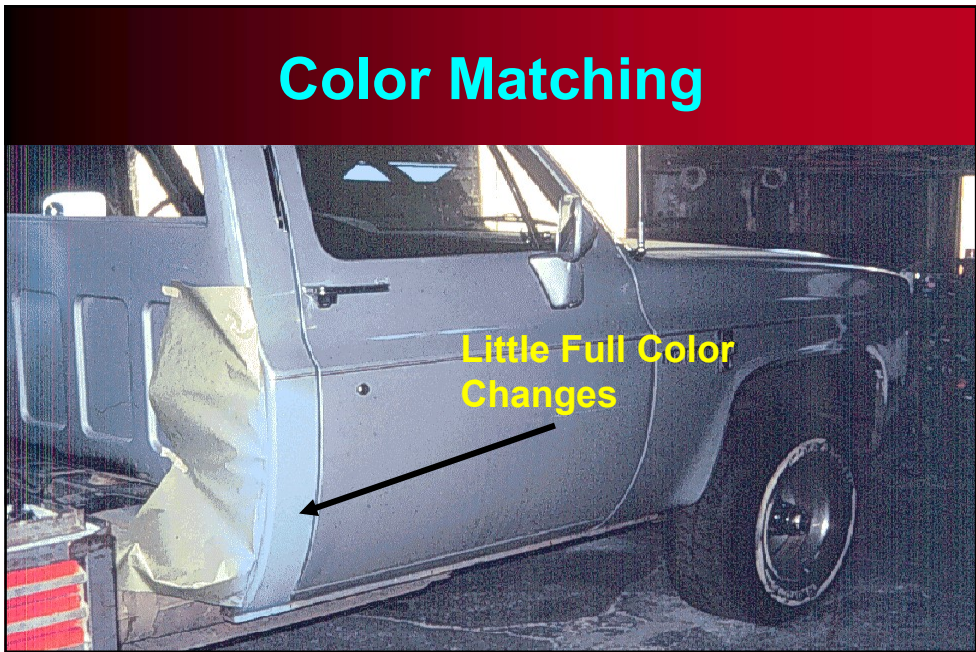
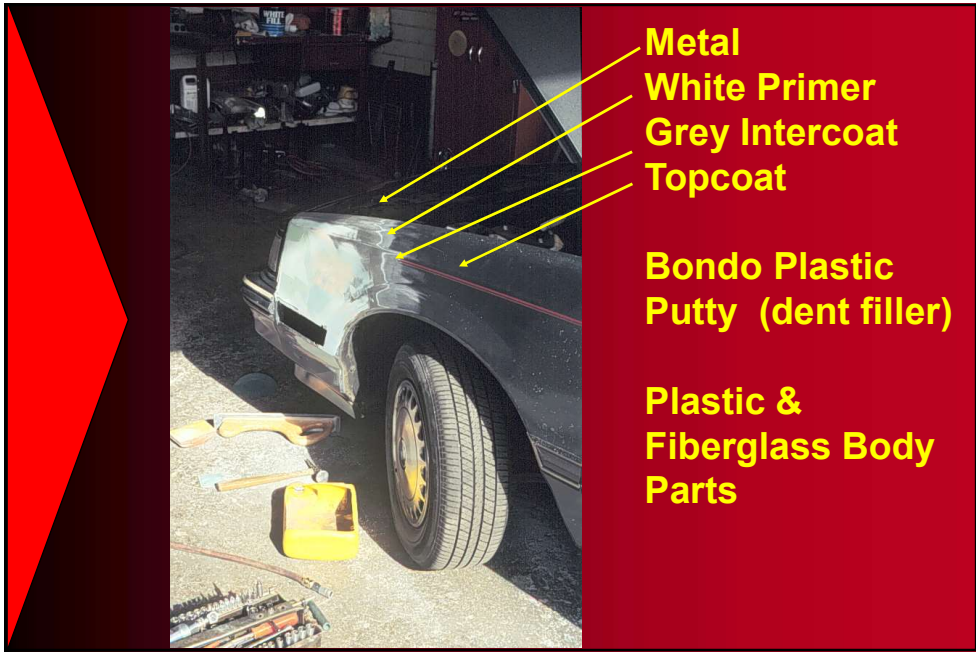
Color Matching

Sun and Weather Exposure

Extreme Aesthetic Standards

No Oven Curing





What's in a Coating?

Four components of any coating:

Binder aka Resin
Pigment
Solvents
Additives



BINDER



- **Natural or Synthetic Resin**
- **Will Harden on Cue (Evaporation)**
- **Most Often a Plastic**

Common Binders



- Nitrocellulose
- Acrylics
- Alkyds
- Polyurethanes
- Epoxies

PIGMENTS



- Small Hard Particles added for:
 - Color
 - Strength
 - UV Protection

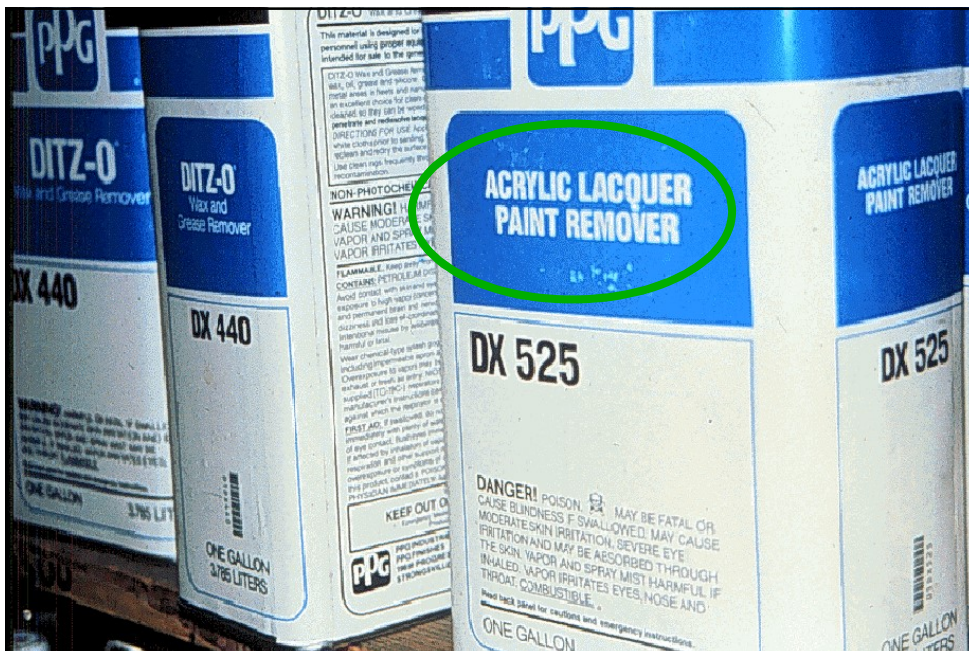
SOLVENTS, DILUENTS AND THINNERS



Liquids Added To:
“Dissolve” Binder
Adjust Viscosity
Promote Adherence
Promote Flow
Drying & Curing

Reducer







ADDITIVES



Material Introduced For:

- Specific Effect on either Wet or Dry Film
- Less than 5% of total coating mass
- May or May Not Evaporate with solvent

Poll Questions 1 & 2

VOC Control Strategies for Coatings

Use Reduction

- Use of Exempt Solvents
- Use of Water-Borne Products
- Increased Solids Contents
- Increased Transfer Efficiency

Retrofit Control Devices

- Capture and Reuse
- Capture and Destroy

Rule Provisions: Automotive Refinishing and Metal Parts



- Transfer Efficiency (T.E.) Provision
- Spray Booth Requirement (PM)
- VOC Coating Content Limits
- Open Container Limits
- Clean Up



Coating Type Formulations

Coating	% Organic Solvent	% Water	%Solids*
Solvent-Borne	~75	0	~ 25
High-Solids	< 40	0	60 - 80
Waterborne	0 - 20	< 80	50 - 100
Powder Coats	0 - 5	0	> 95

* Solids Include: Binders, Pigments & Additives

Exempt Solvents*

- Vary by Agency Definition
- Have a Variety of Human Health Effects Including Anesthesia and Intoxication
- Stratospheric Ozone Depletion
- Sometimes Incompatible with Aluminum or Water

*Negligibly Photochemically Reactivity

Waterborne Coatings

- Provide:
 - Solvent Penetration Protection
 - Low VOC
 - Reduced Fire Insurance
 - Easy Clean-up
- Require:
 - Careful Surface Prep
 - Temp. & Humidity Control While Curing
 - or Longer Drying Times
 - Stainless Steel Equipment

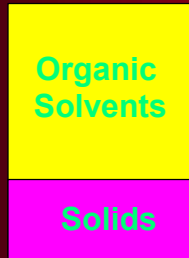
Difficulties for Waterborne Metallic Topcoats

Hydrogen Evolution

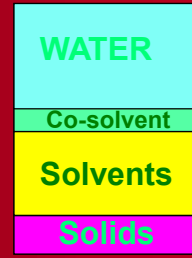
Flake Orientation (Critical Dry Times)



Water as a Diluent



x grams of solids
covers area y



x grams of solids
covers area y

Co-Solvent

(aka coupling agent)

Solvent that Causes Two Immiscible Liquids to Mix

May Comprise up to 30% of the Liquid in a Waterborne Coating

Powder Coatings

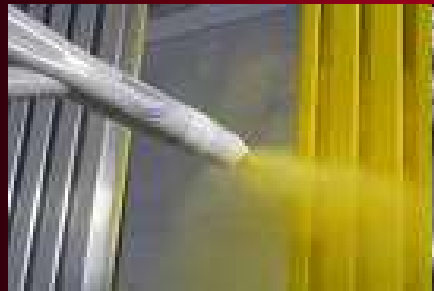
- **Thermoplastic or Thermoset**
- **No on-site Color Mixing**
- **Faraday Cage Effect**
- **Baked to Cure**
- **Electrostatic Application or Fluidized Bed Required**

Spray Application Methods

- Airless
- Air-Atomized or “Conventional”
- Electrostatic
- Air-Assisted Airless
- HVLP (High-Volume Low-Pressure)
- Rotary Atomization - Turbobell

Transfer Efficiency (T.E.)

Percentage ratio of the weight of solids deposited on the substrate to the weight of solids actually used



Transfer Efficiency Variables

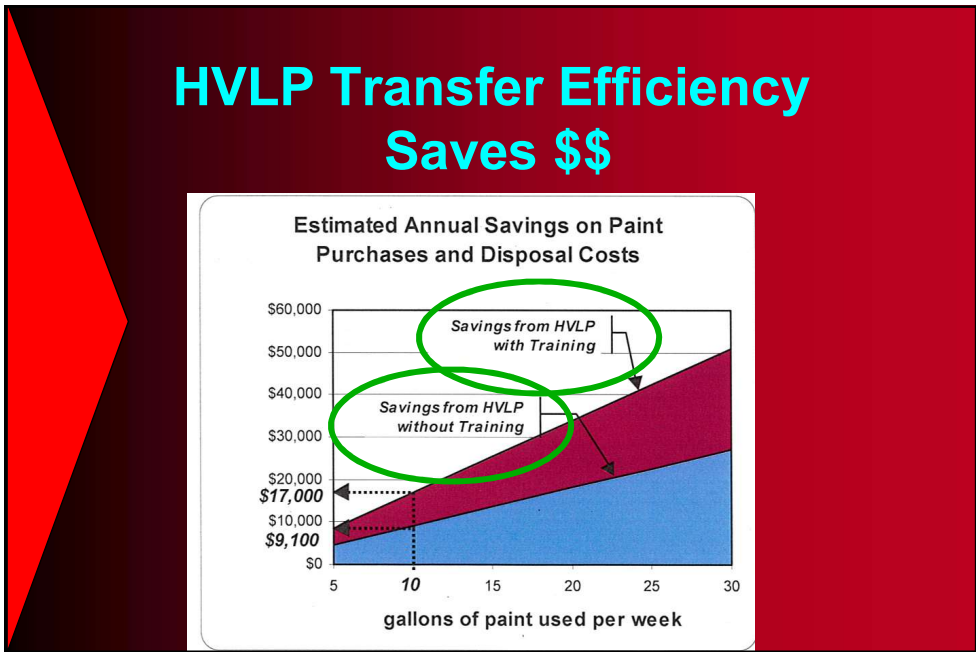
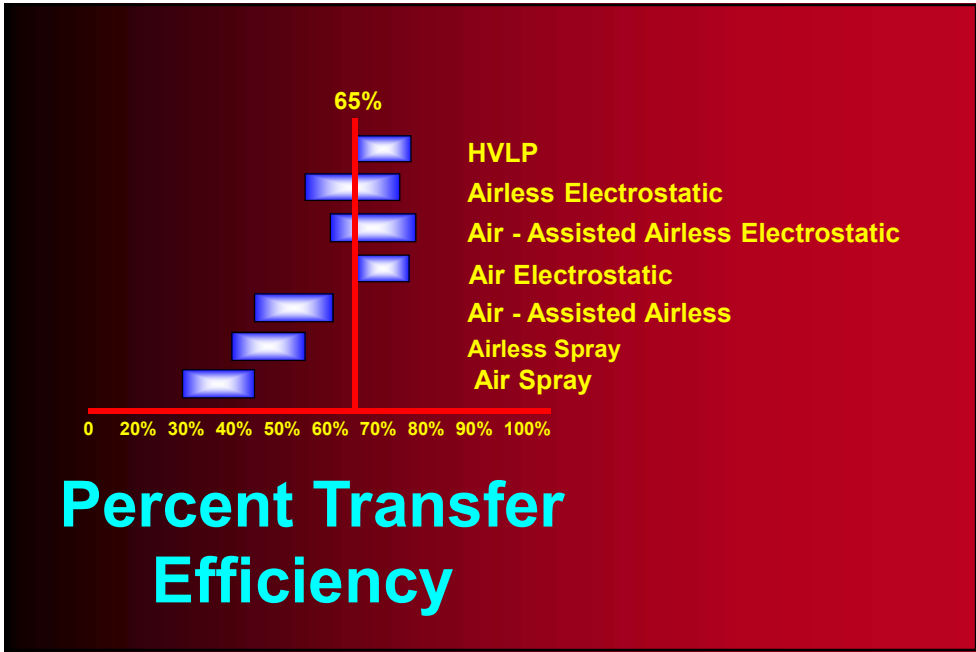
- Spray Equipment
- Shape of Part
- Ambient Temperature and Humidity
- Air Flow Rate in Spray Booth



Transfer Efficiency Variables

- Coating Chemistry
- Painter Training and Experience
- Paint Pressure and Air Pressure at Nozzle





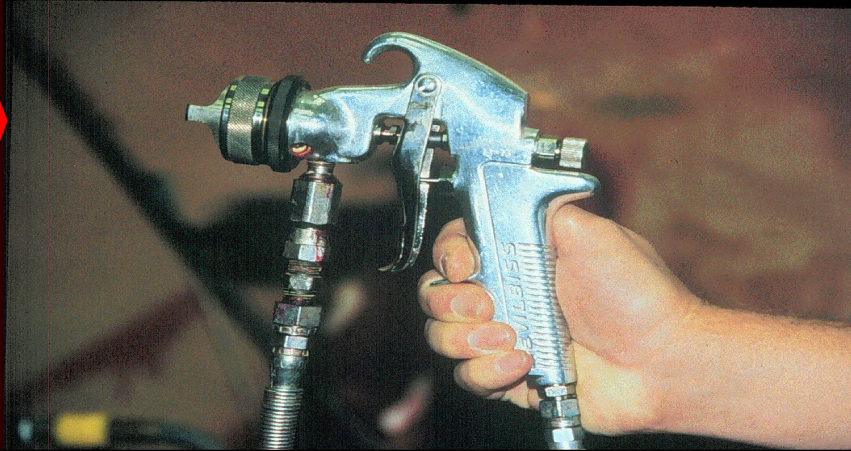
Gun Control



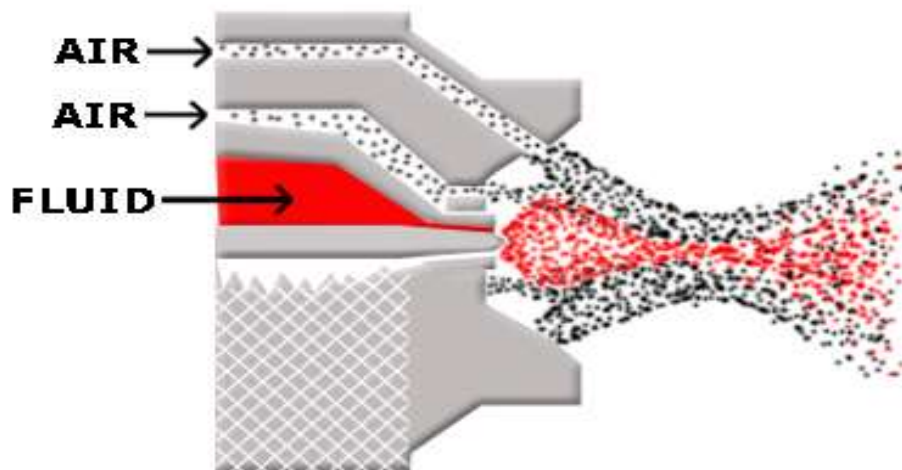
Air Spray Video



HVLP? DeVilbiss Gun



AIR ATOMIZATION



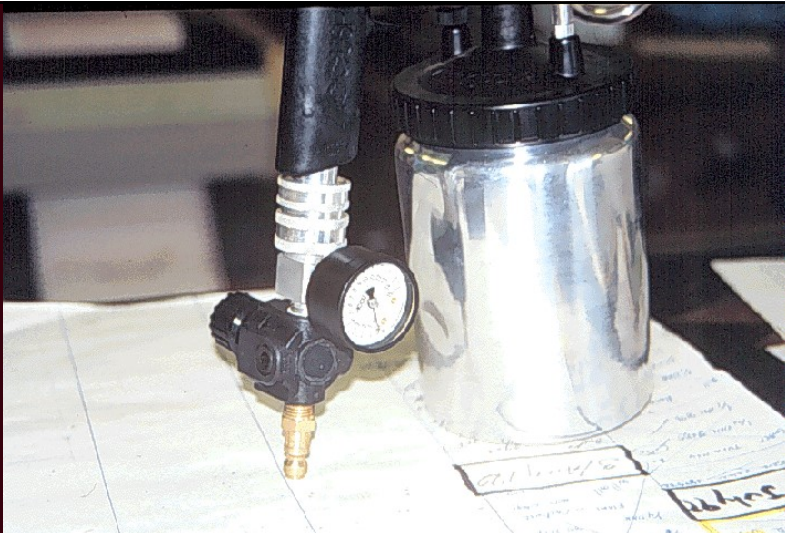
HVLP Caps



Spray Cap Pressure Gauge



**Digital
Air
Pressure
Readout**



**Gun Air Pressure Gauge.
Can this Replace the Spray Cap Pressure Gauge?**

HVLP Gun Manufacturers

SATA High end products with precision engineering and digitally controlled mechanisms.

DeVilbiss Age old industry standard spray gun. A wide range of models.

Sharpe American made, budget price.

Binks Another industry standard gun. Binks guns share a market niche with DeVilbiss.

Accuspray Only gun with a plastic body

Astro Pneumatic guns are modeled after higher priced models above .

Spray Gun Feed Options



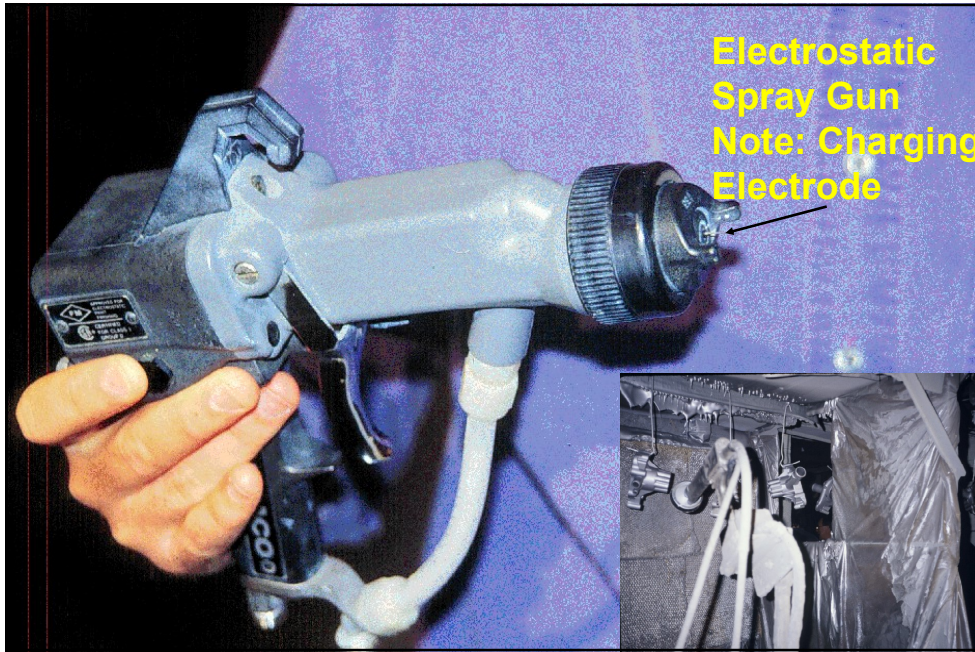
Gravity Feed



Suction/Siphon Cup



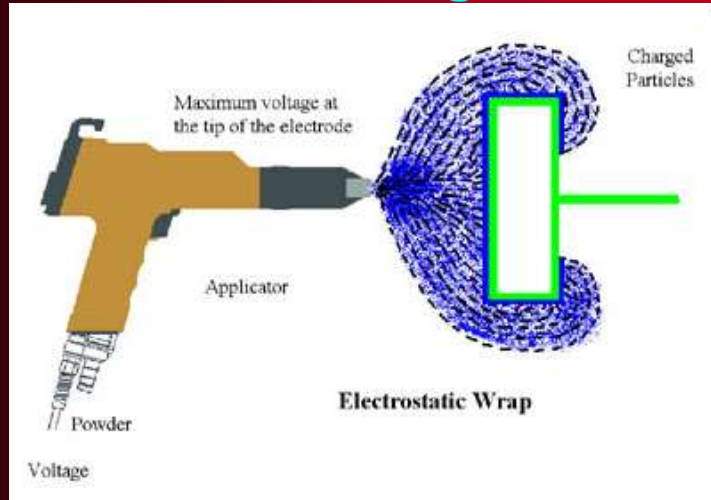
Pressure Feed



Electrostatic Spray Video



Powder Coating Gun



Powder Coatings Video



Powder Coated Products

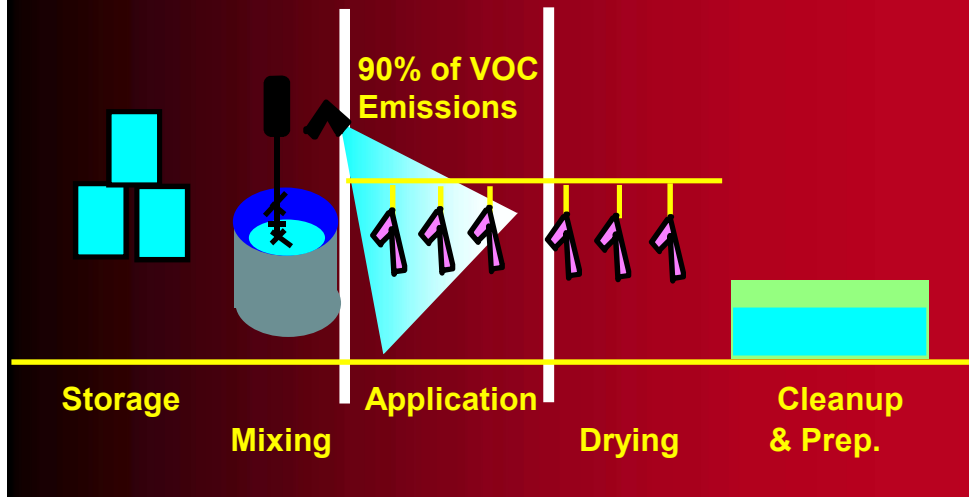


Poll Questions 3 & 4

Coating Steps and Points of Emission

- Abrasive Sanding or Blasting
- Surface Clean and Prep
- Primer & Topcoat Application
- Flash Off -- Drying
- Curing
- Touch Up
- Equipment Clean Up

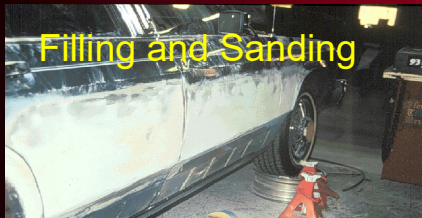
Points of VOC Emission



Surface Preparation

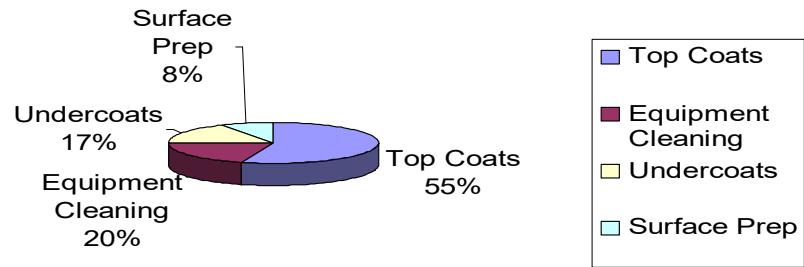
- Abrasive Sandblasting
- Body Filler (Auto)
- Cleaning/Degreasing
- Application Acid Etching

Surface Preparation



VOC Emissions Automotive

US EPA's VOC's Emissions Estimate



Curing

**The Process in which
Paint is Converted from
Liquid to Solid**

Curing and Coating Types

- Air Drying
- Lacquers
- Enamels
- Powder Coats
- High Solids
- Waterborne

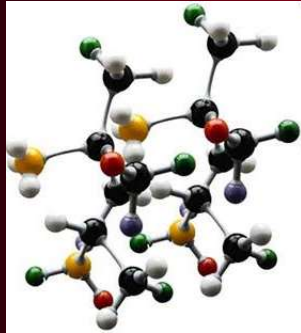


More on Curing - Lacquer

- Cures by the Evaporation of the Solvent



More on Curing - Enamel



Cures by an Irreversible Chemical Reaction Involving Various Components or Atmospheric Water or Oxygen

Coatings

Curing Methods

- ⊗ Air dried
- ⊗ Thermoset or Thermocure
Baked Coating > 194°F
- ⊗ Thermoplastic
- ⊗ Radiation

202.2

Curing Times

⊗ Air dried	hours
⊗ Oven Baked	minutes
⊗ Epoxy Systems	minutes
⊗ Ultraviolet (UV)	seconds
⊗ Electron Beam	< 1 second

EPA-625/3-77-009

Curing Types (cont.) Thermoset/Thermocure



- **Solid Resins**
- **Heated - melt and flow**
- **Cross-link to form Higher Molecular Weight Solid**
- **Remains Stable After Heating**

Curing Types (cont.) Thermoplastic



- A Polymer
- Liquid when Heated
- Freezes Glassy when Cooled
- No Cross-linking
- Re-melted, Re-molded, and Recycled

Oven Cured Temps



Automotive Ops Are Special



Forced Dry or
Accelerated Drying
with heat lamps

Is this a baked cure?

194° F
Regulatory Cutoff

Poll Questions 5 & 6

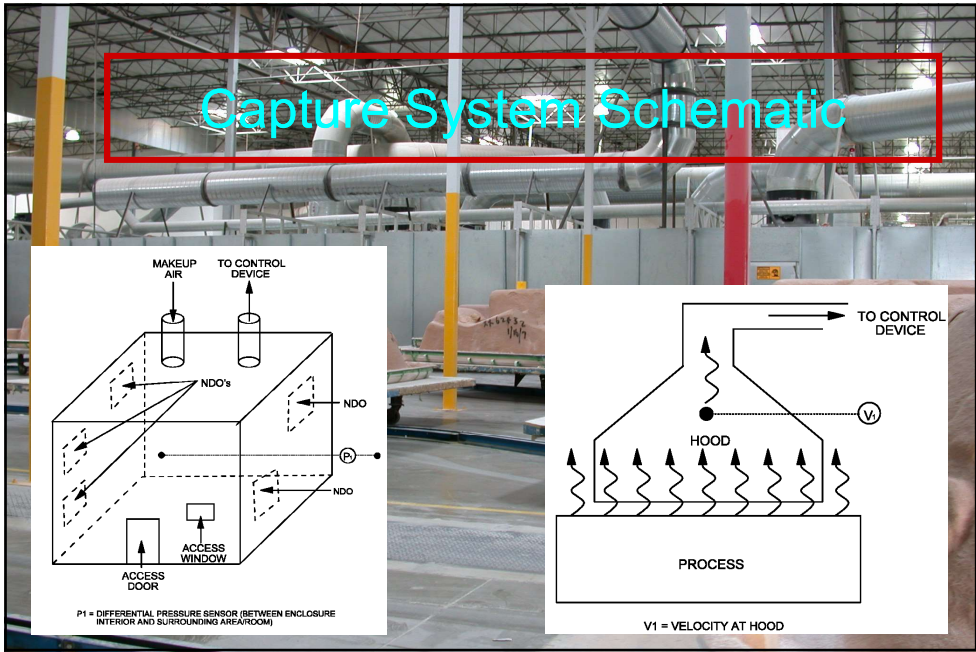
Control Alternative

Rather than Meet VOC Limits a Source May:

- **Collect at Least a Required Percent by Weight of Emissions**

And

- **Transport to a Central Device that Reduces Emissions at Least a Required Percent (Total Control = 85%)**



Booth Design

Air Flow

Downdraft

Sidedraft

Hood

Particulate Collection

Water Wash

Dry filter

Down Draft Spray Booth



Water Wash Spray Booth



VOC Control Techniques – Capture System

- Performance indicators
 - Enclosures (Spray Booths)
 - Face velocity
 - Differential pressure
 - Average face velocity and daily inspections

Baghouse for Powder Coater





VOC Control Equipment

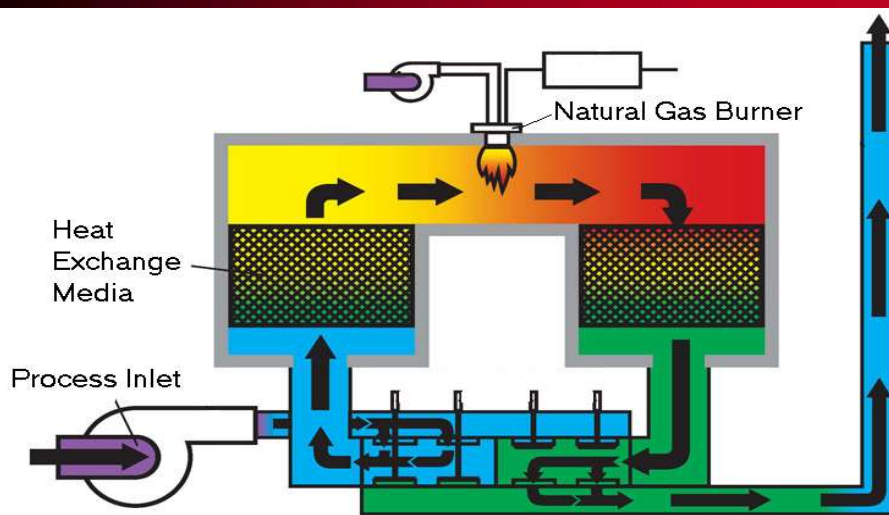
- **Incineration**
 - **Direct Flame – Thermal Oxidizer**
 - **Catalytic Oxidizer**
- **Carbon Adsorption**
- **Condensation**
- **Absorption**

NACT Course #299 – Theory & Application of Air Pollution Control Devices

Catalytic Oxidizer

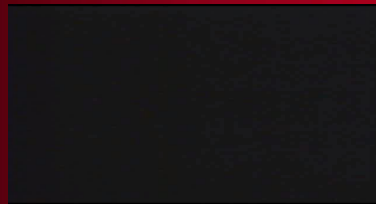


Regenerative TO - RTO

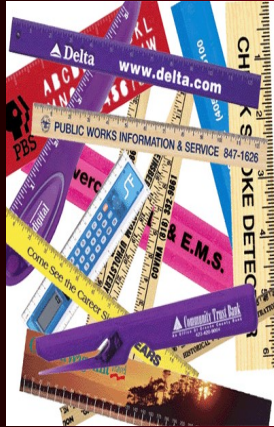


Poll Questions 7 & 8

MACT Case Study Video



Applicable Rules



- Nuisance
- Visible Emissions
- Prohibitory & NSR
- HAPS
- Permits
- Fugitive Dust (PM)



Why NESHAP's

- Hazardous Air Pollutants (HAPs)

- Toxic Air Contaminants (TACs)

- Chromium
- Cadmium
- Lead
- Manganese



NESHAPS Misc. Metal Parts

- A Major Source If More than 10 tons per year of any ONE Hazardous Air Pollutant or 25 tpy or more of any COMBINED HAPs
- The Operator Will be Subject to Maximum Achievable Control Technology (MACT)
- 40 CFR Part 63 MMMM for Misc. Metal Parts

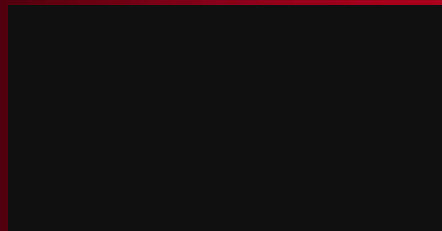
NESHAPS Misc. Metal Parts

<u>Coating</u>	<u>lb. HAP / gal solids*</u>
General	1.9
High Performance	27.5
Magnet Wire	0.44
Rubber-to-Metal	6.8
Fluoropolymer	12.4

* also written in terms of kg HAP per liter of coating solids

This is for new sources, existing usually have higher allowances

6 HHHHHH Rule Video

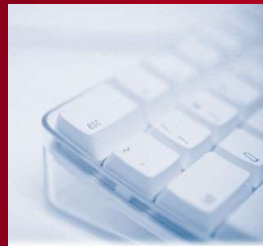


NESHAPS: Paint Stripping and Misc. Surface Coating Ops at Area Sources

- **40 CFR 63 Subpart HHHHHH**
- **Initial Notification by Jan. 10, 2010 for Existing Sources**
- **Jan. 9, 2008 for New Sources**
- **Exclusions (Military, labs, etc.)**

HAPS AFFECTED

- **Chromium**
- **Lead**
- **Manganese**
- **Nickel**
- **Methylene Chloride**



HHHHH Rule Provisions

Motor Vehicle and Misc. Surface Coatings

- **Train/Certify ALL Painters**
- **Spray Booth Requirements**
 - **98% Capture Efficiency**
 - **Enclosures - Auto Complete**

More on Training

- **Painters must be certified as completing training in proper spray application of surface coatings, setup and maintenance of spray equipment**
 - **Except students of accredited surface coating training program who are under the direct supervision of an instructor who is certified**

More on Training

- **Training program must include:**
 - **Spray gun equipment selection, set up, and operation**
 - **Best spray technique for different types of coatings to improve transfer efficiency and minimize overspray**
 - **Routine booth and filter maintenance, filter selection and installation**
 - **Compliance with requirements of the NESHAP**

More on Training

- **Owner or operator must certify training of each person was completed**
- **Certification must include:**
 - **List of personnel who are required to be trained, with name and job description**
 - **Hands-on and classroom instruction, covering elements of training program at a minimum**
 - **Description of methods used at completion of initial or refresher training to demonstrate successful completion**

More on Booths

- **Spray Booths and Prep Stations**
 - Booths and prep stations for complete motor vehicles or mobile equipment must
 - Have full roof and four walls or side curtains, and operate at negative pressure;
 - OR
 - If sealed doors/openings + automatic pressure balancing system, booth operated at up to, but no more than, 0.05 inches w.c.g. positive pressure

More on Booths

- **Spray Booths or Prep Stations**
 - Booths or prep stations for miscellaneous coating or vehicle sub-assemblies
 - Have full roof, at least 3 complete walls or side curtains, and ventilated so air is drawn into the booth
 - Roof and walls may have openings for conveyors

Recordkeeping

- **Surface Coating**
 - Painter training certification
 - Documentation of filter efficiency
 - Copies of all notifications and reports required
 - Records of any deviations from requirements in the rule, including date and time period it occurred, a description of deviation, and corrective actions taken
 - If spray gun does not meet definition of acceptable technologies and has cup capacity at least 3.0 oz., documentation from spray gun manufacturer that Administrator has determined equivalent transfer efficiency

Possible SIP Automotive Req'ts

- Prohibition of Non-Compliant Coatings
- Prohibition of Specification
- Reactive Organic Compound (ROC) Content Must be Listed on Either the Container or Product Spec. Sheet
- All ROC Stored in Sealed Containers
- Operator Must Maintain all Records Necessary to Determine Compliance
- Specialty Coatings May Not Exceed 840 gm/ltr or 5% of Monthly Usage

Possible SIP Automotive Requirements

Coatings Must be Applied Using High-Volume Low-Pressure (HVLP) Equipment

OR

Agency Prohibitory Rules May Require Best Available Control Technology

Possible SIP Automotive Req'ts



All Coating Application Usually in a Permitted Spray Booth

Poll Questions 9 & 10

Inspections



Pre-Inspection

Obtain Inspection Forms
Permit Review and Check
Safety Equipment Check
Regulation Review
File Review
Meeting at Facility with Representative

Inspection Video



Inspection

Look for
Open Containers



Open Containers?



Good Housekeeping?



Speaking of Rags



Booth Inspection



Booth Inspection



Violation?



Inspection



**Check Pressure Drop
(Δp) Across Filters**



**Check Filters.
Dirty, Painted or Clogged?**

Inspection



Automated VOC tracking system

Solvents



- Used for Cleaning
 - Tar
 - Prep for Plastic
 - Removing Adhesive



Inspection

Do we need a
spray cap pressure
gauge?



Acetone
Reclaim
System

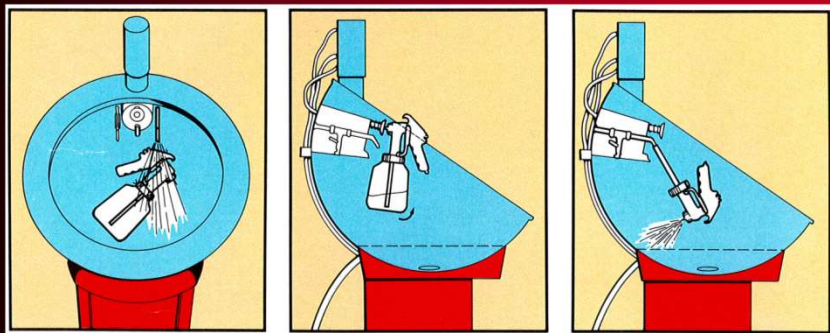


Inspection

SAFETY-KLEEN Spray Gun Cleaner.
Is this a covered or open container?



How The Gun Cleaner Works



Alternative Cleaning Solutions

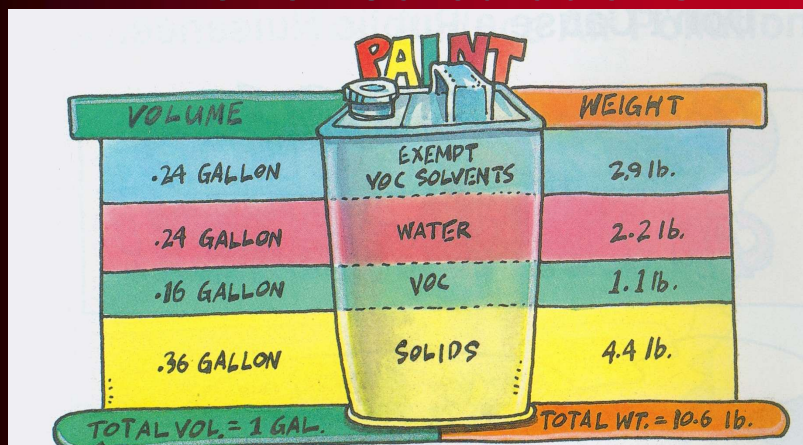


Recordkeeping Review

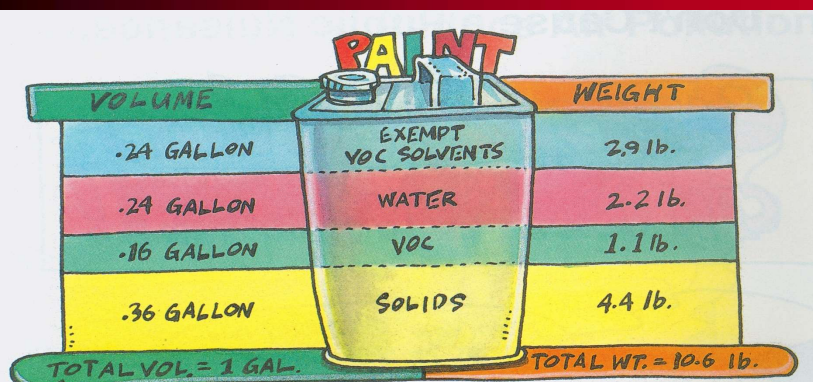
- Longest Part of the Inspection
- Do They Keep Records ?
- Check Permit Requirements



Time for Calculations



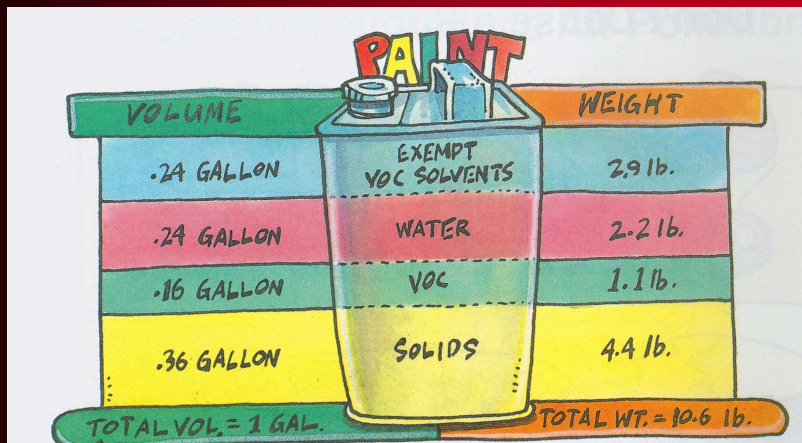
What is the VOC content of this coating?



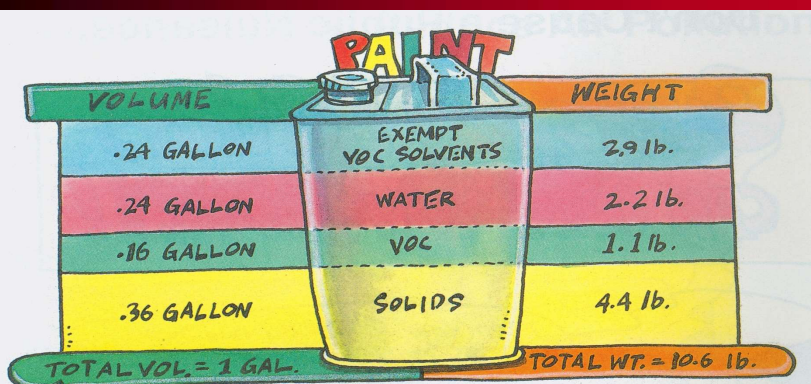
1.1 lbs VOC

$$\frac{1.1 \text{ lbs VOC}}{(1 \text{ Gal} - .24 \text{ gal} - .24 \text{ gal})} = 2.1 \text{ lbs/gal}$$

Time for Calculations



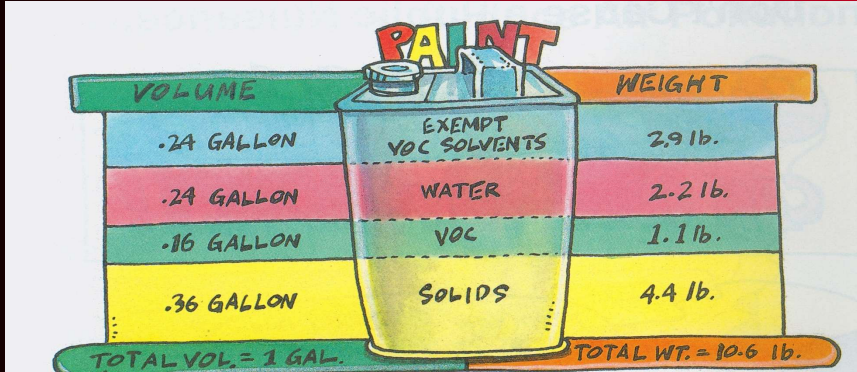
What is the HAP content of this coating?



1.1 lbs + 2.9 lbs (voc + exempts)

————— = 11.1 lbs/gal

.36 gal



1.1 lbs + 2.9 lbs (voc + exempts)

= 11.1 lbs/gal

$$1 - [2.9/(2.9 \cdot 24)] - [2.2/(2.2 \cdot 24)] - [1.1/(1.1 \cdot 16)]$$

A Real World Application

TNEMFC

Series 394

Series 394 Perimeprimer (9/07)
SURFACE PREPARATION: STEEL: Enclosed or Fireproofed; SSPC-SP3 Power Tool Cleaning, Moderate Exterior Exposure; Abrasive blast cleaning generally produces the best coating performance. If conditions won't permit this, Series 394 may be applied to SSPC-SP2 or SP3 Hand or Power Tool Cleaned surfaces. Immersion & Severe Exposure: SSPC-SP10/NACE 2 Near-White Blast Cleaning, Slip Critical Connections: SSPC-SP5/NACE 1 White Metal Blast Cleaning or SSPC-SP3 Power Tool Cleaning. **ALL SURFACES:** Must be clean and free of oil, grease and other contaminants.

VOLATILE ORGANIC COMPOUNDS (VOC):

	Grams/Litre	Lbs/Gal
Unthinned	330	2.76
Thinned 10% (No. 2 or 3 Thinner)	381	3.18
Thinned 10% (No. 49 Thinner)	330	2.76

CURING TIME—AT 70°F (21°C) & 50% R.H.: To touch: ¼ hour. To handle: 1½ hours. To recoat: 2 hours. — **AT 60°F (16°C):** To touch: ¼ hour. To handle: 2¾ hours. To recoat: 2¾ hours. — **AT 50°F (10°C):** To touch: ¼ hour. To handle: 5 hours. To recoat: 5 hours. Curing time will vary with surface temperature, humidity and film thickness. **Note:** When recoating Series 394 with topcoats other than itself, the minimum recoat time is 16 hours. **Note:** Series 44-710 Accelerator must be used when the surface temperature falls below 50°F (10°C).

STORAGE TEMPERATURE: Minimum 20°F (-7°C), Maximum 110°F (43°C)

MIXING: Stir thoroughly, making sure no pigment remains on the bottom of the can. Use a power mixer and keep material under constant agitation while mixing.

COVERAGE RATES:

	Dry Mils (Microns)	Wet Mils (Microns)	Sq Ft/Gal (m ² /Gal)
Suggested	3.0 (75)	5.0 (125)	326 (30.3)
Minimum	2.5 (65)	4.0 (100)	391 (36.4)
Maximum			42.4

COMMON USAGE: Specially formulated for bonding to marginally prepared rust resistance with a triple barrier mechanism primer under certain fireproofing systems.

THINNING: For spray, thin up to 10% or 1/4 pint (380 ml.) per gallon with No. 3 Thinner at 70°F (21°C). For brush or roller, thin up to 10% or 1/4 pint (380 ml.) per gallon with No. 3 Thinner at 70°F (21°C). For brush or roller, thin up to 10% or 1/4 pint (380 ml.) per gallon with No. 3 Thinner at 70°F (21°C). **Note:** No. 49 Thinner may be substituted.

POT LIFE: 24 hours at 77°F (25°C) and 50% R.H. cures with moisture acting as a catalyst. Incorporate humid air (humidity) during use, will shorten pot life.

APPLICATION EQUIPMENT: **Note:** When intermediate application, or when roller applied by using 1/4" wheel.

	Road Trip	Air Cap
Gun	750	1100
	E	754
DeVilbiss JGA*		
* (with heavy plastic spray) Low temperature applications use appropriate application equipment for application.		
Use appropriate application equipment for application at temperature below 1/2° or 5/8° or 3/4° or 1" or 1 1/2" or 2" or 2 1/2" or 3" or 4" or 5" or 6" or 8" or 10" or 12" or 14" or 16" or 18" or 20" or 24" or 28" or 32" or 36" or 40" or 44" or 48" or 52" or 56" or 60" or 64" or 68" or 72" or 76" or 80" or 84" or 88" or 92" or 96" or 100" or 104" or 108" or 112" or 116" or 120"		

WARRANTY INFORMATION: For warranty, limitation of this product, or contact your Tremco representative.

KEEP OUT OF REACH OF CHILDREN

Time for Calculations

Coating VOC = 2.76 lbs/gal

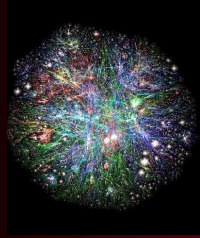
Thinner VOC = 7.27 lbs/gal

Our Operator uses it at 1%
Mixture Rate

Time for Calculations

$7.27 \times .01 = .0727$ lbs/gal VOC @ 1% Mixture Ratio

$2.76 \text{ lbs/gal} \times .99 = 2.73 + .0727 = 2.80 \text{ lbs/gal}$



Websites

- epa.gov/stationary-sources-air-pollution/national-emission-standards-hazardous-air-pollutants-neshap-9
- epa.gov/collision-repair-campaign
- nmfrc.org/
- ccar-greenlink.org
- paintcenter.org/

Questions?

