

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

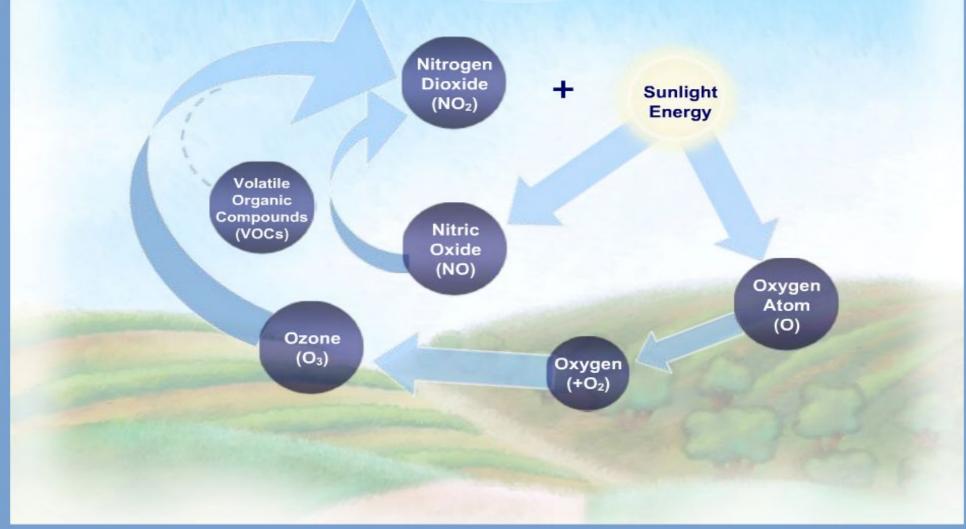
Respiratory Discomfort to Sensitive Populations

\$330 Million in Crop Damage Each Year

Damage & Failure of Paints and Rubber Parts



Ozone Photochemistry



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



Phosphate Cleaner, Electro Deposition for Corrosion

Sealer

-

Primer White, Black, Silver and Red



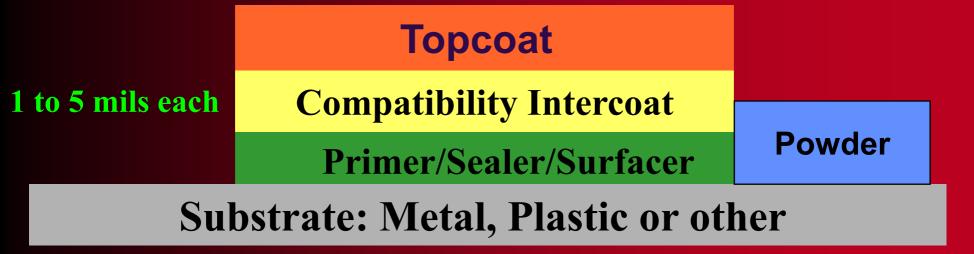
Base

Coat

Top Coat and Clear Coat

New Car Coating Process





REFINISHING

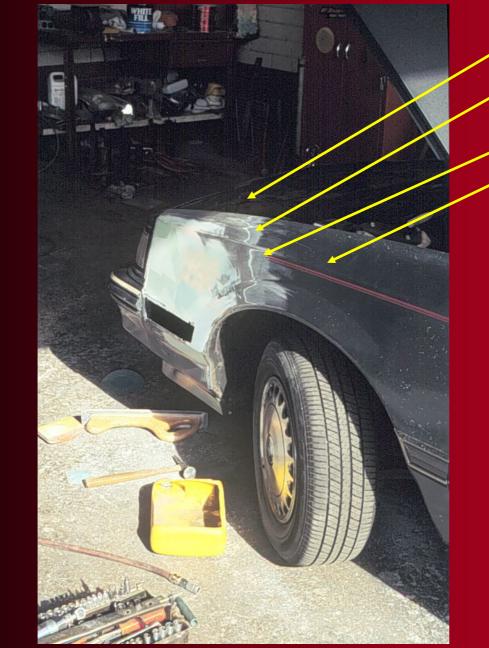
Refinishing is the coating of vehicles, their exterior parts or components, or mobile equipment, including partial body collision repairs for the purpose of protection or beautification and which is subsequent to the coating applied at the manufacturers' assembly line.

Refinish Coating Manufacturers BASF InMont **DuPont PPG/Ditzler** Sherwin Williams sikkens Glasurit Sikkens Glasürit

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

Special Features of Auto Refinishing





Metal White Primer Grey Intercoat Topcoat

Bondo Plastic Putty (dent filler)

Plastic & Fiberglass Body Parts

Color Matching

Little Full Color Changes

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 Color Strength UV Protection

SOLVENTS, DILUENTS AND THINNERS



Liquids Added To: "Dissolve" Binder **Adjust Viscosity Promote Adherence Promote Flow Drying & Curing**

Reducer

to find the part of the second state





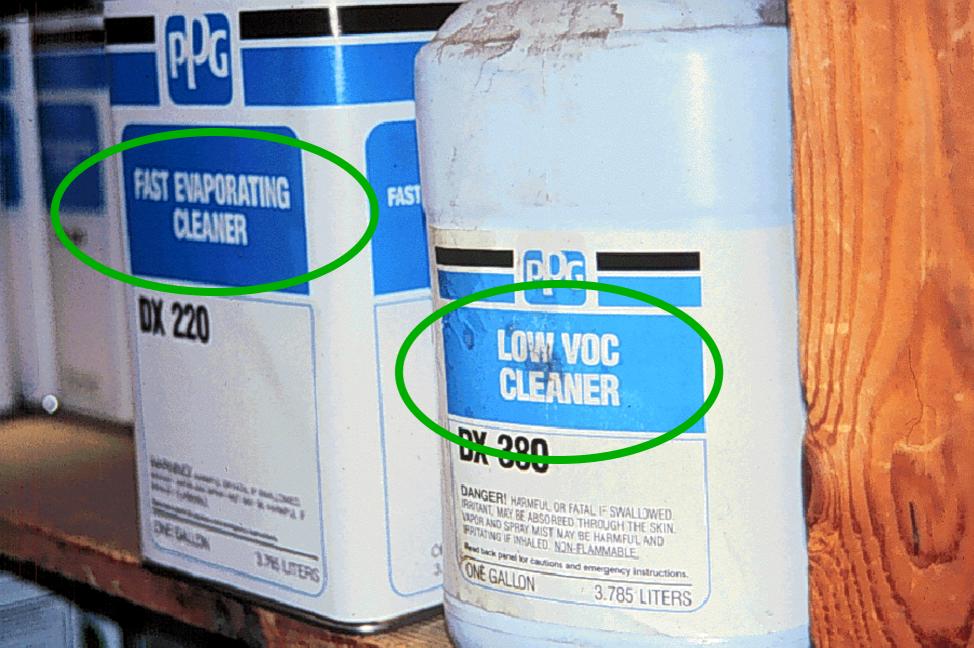


1220 This material is designed for personnel using proper rout intended for sale to the gene DITZ-O Was and Greate Am wat, oil great and piccow metal areas in freets an successoril choice for clean ideated so they can be work perceitrate and redunctive table DIRECTIONS FOR USE ADD white cloths prior to sending Sciest and redry the surface Use cleanings trackerely the ACRYLIC LACQUER PAINT REMOVER recordamination NON-PHOTOCHE MF WARNING! H ESP CAUSE MODERA VAPOR AND SPR t Lti VAPOR IRRITATES FLAMMABLE, Knop arth CONTAINS PETROLE M PO Avoid contact with samend m exposure to high wappy concer and permanent bran and nerve distances. Ind loss of coordinant Interdoriel makes by reburne DX 525 Parmity or tatal Wear chemical-type wash grid including increment in spron a Overesponses to vacuri per M exhaust or break as entry NeCl supplied [TO-ThC-1 represent manufacturer's instructions par against which the recorder is EIRST AD, I Instituted form interesting with party of with Construction or survival the P THE product contact a POINCY PHYSICIAN ABLE DATTINE AN KEEP OUT O margine S 1044 WH PROUM

URONOSHILLE

DANGERI POISON & MAY BE FATAL OR CAUSE BUNDNESS F SWALLOWED MAY CAUSE MODERATE SKIN IRRITATION, SEVERE EYE IRRITATION AND MAY BE AESORBED THROUGH THE SKIN, VAPOR AND SPRAY MIST HARMFUL IF INHALED. VAPOR IFRITATES EYES, NOSE AND Peed back panel for cautions and emergency instructions. ONE GALLON





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	Formu	ations
Joanny			

Coating	% Organic	% Water	%Solids*
	Solvent		

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

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



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**

Transfer Efficiency (T.E.)

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



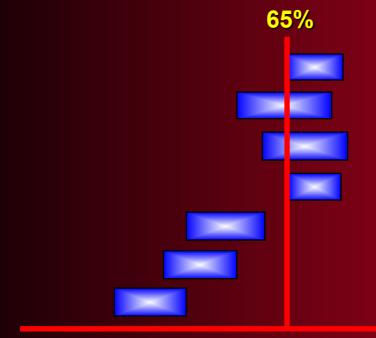


Transfer Efficiency Variables

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

Transfer Efficiency Variables

Coating ChemistryPainter Training and Experience Paint Pressure and Air Pressure at Nozzle

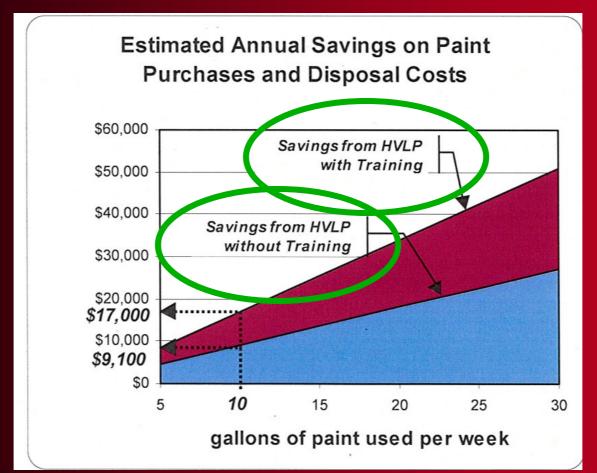


HVLP Airless Electrostatic Air - Assisted Airless Electrostatic Air Electrostatic Air - Assisted Airless Airless Spray Air Spray

0 20% 30% 40% 50% 60% 70% 80% 90% 100%

Percent Transfer Efficiency

HVLP Transfer Efficiency Saves \$\$



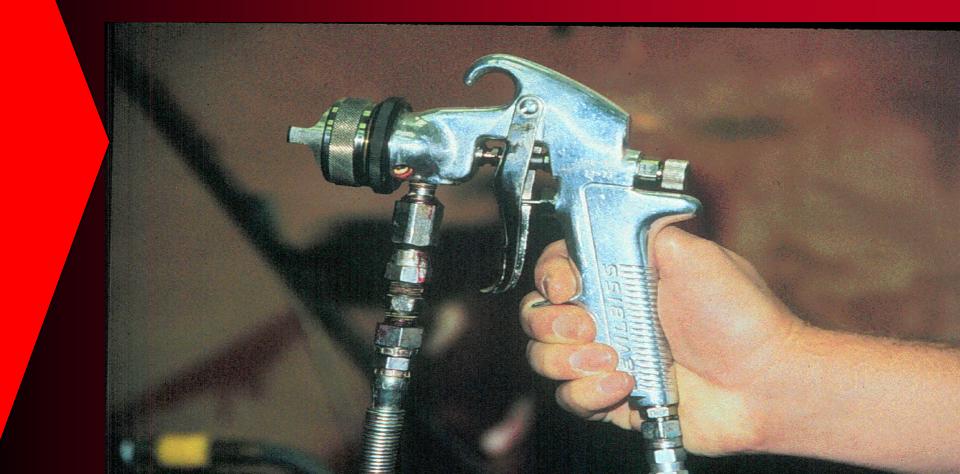




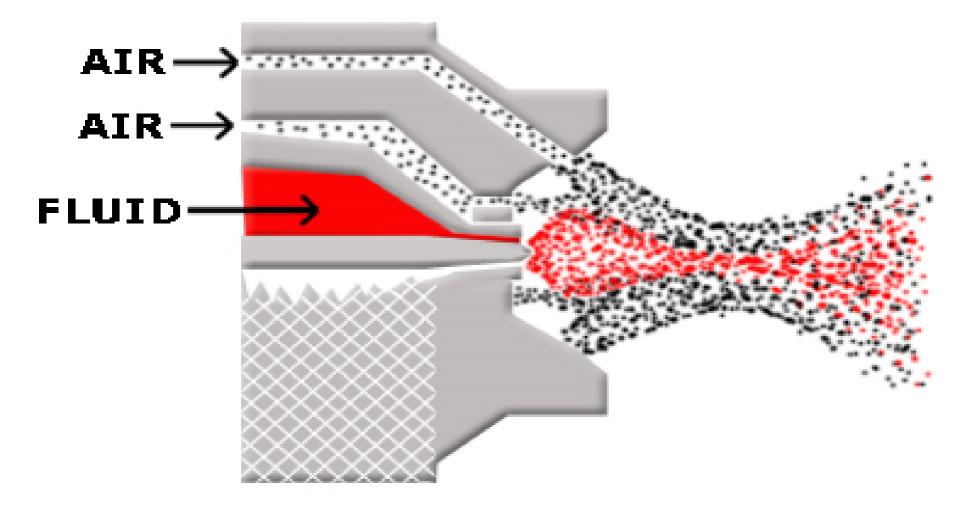
Air Spray Video



HVLP? DeVilbiss Gun



AIR ATOMIZATION



HVLP Caps

Air Horn or Wing Port

Hole Size

HVLP

Primer

Conventional

Air



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

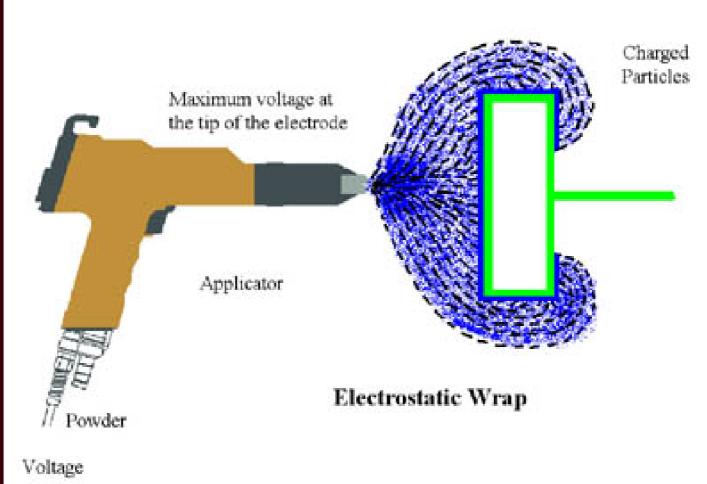
Electrostatic Spray Gun Note: Charging Electrode

A C. C. ADDA

Electrostatic Spray Video



Powder Coating Gun



Powder Coatings Video



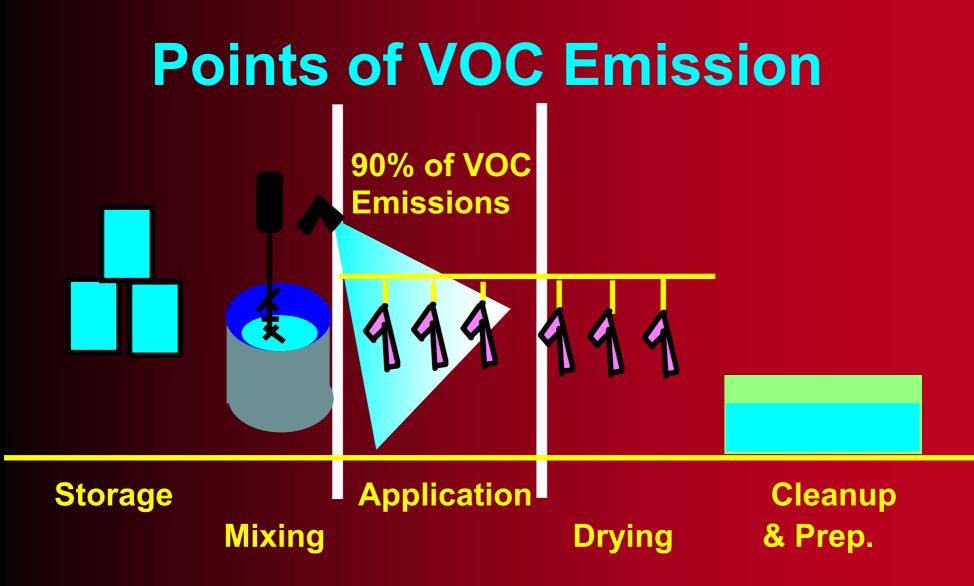
Powder Coated Products



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



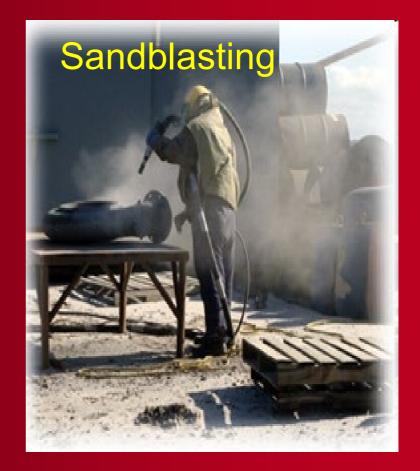
Surface Preparation

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

Surface Preparation

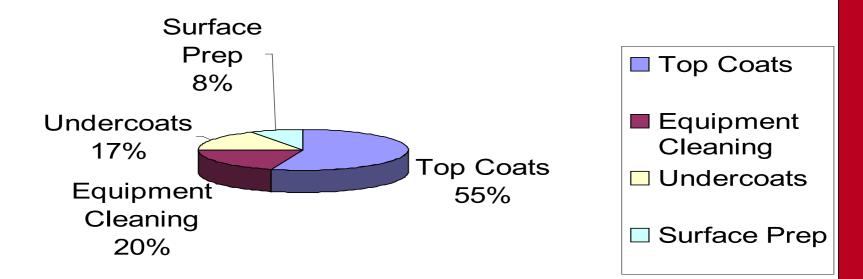






VOC Emissions Automotive

US EPA's VOC's Emissions Estimate





The Process in which Paint is Converted from Liquid to Solid

Curing and Coating Types

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



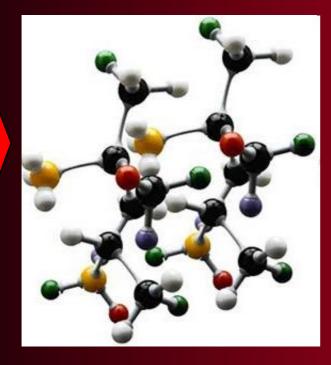
More on Curing - Lacquer

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



Curing Methods

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



Coatings

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, Remolded, 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

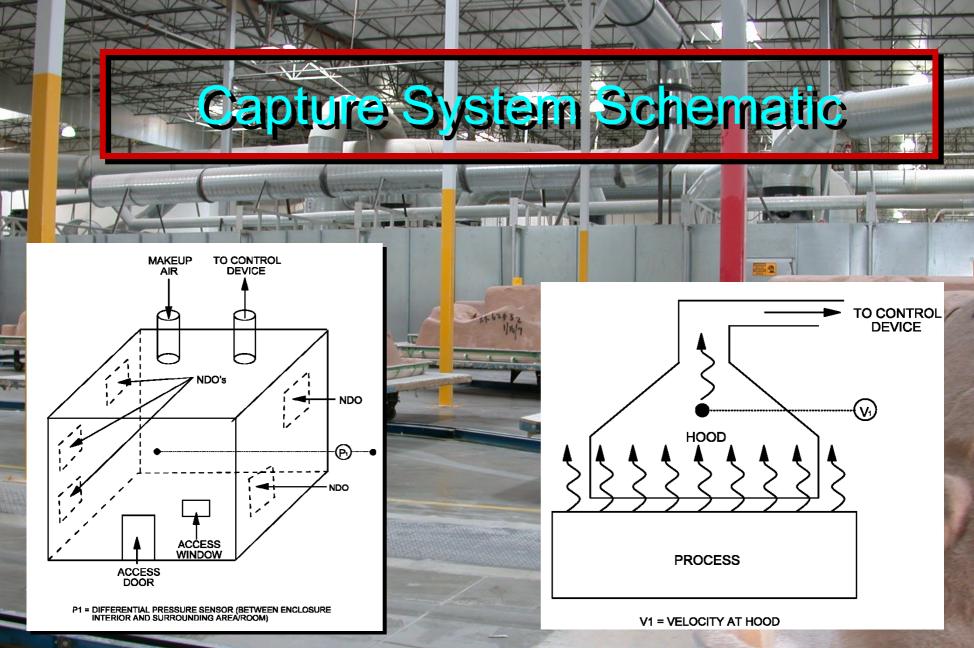
Control Alternative

Rather than Meet VOC Limits a Source May:

 Collect at Least a Required Percent by Weight of Emissions

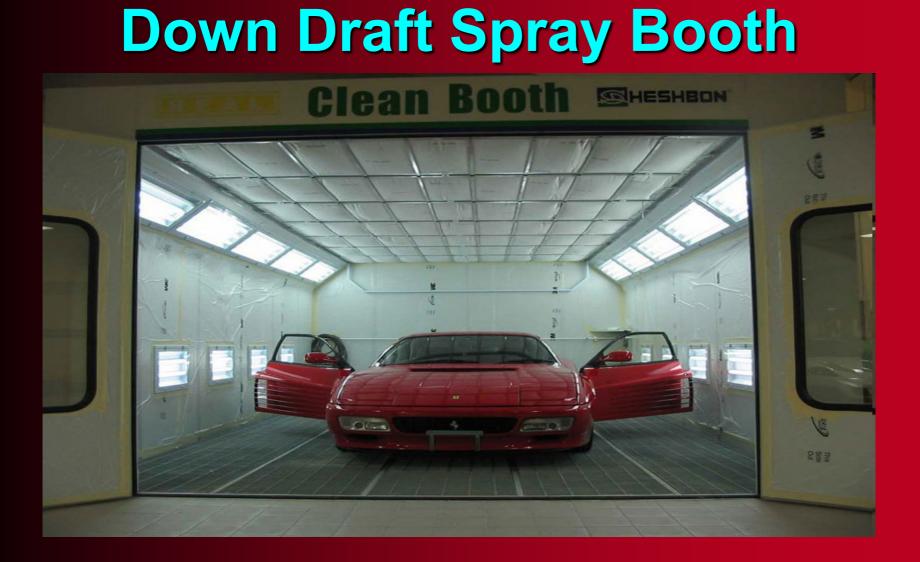
And

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



Booth Design





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



REMEMBER Booth is for PM Only NOT VOC's

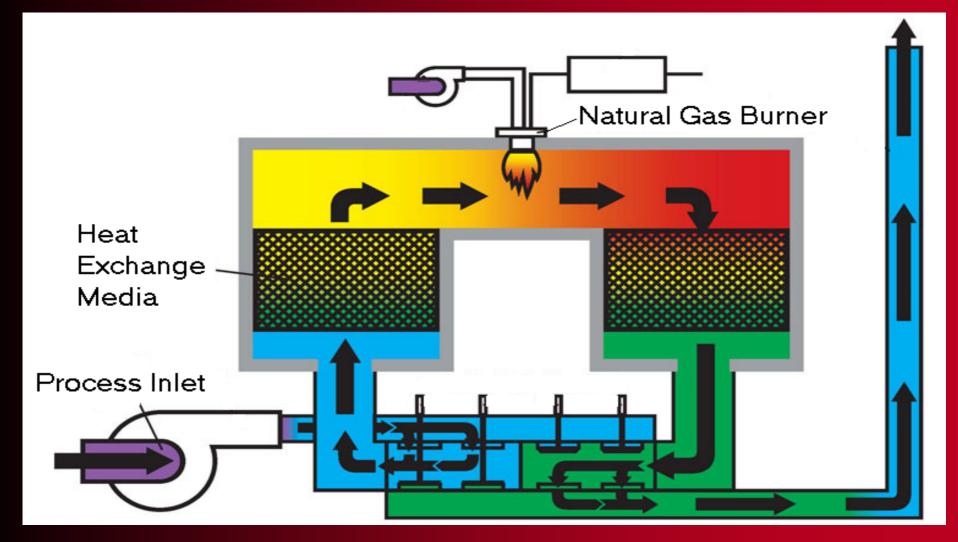
VOC Control Equipment Incineration **Direct Flame – Thermal Oxidizer Catalytic Oxidizer Carbon Adsorption Condensation** Absorption

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

Catalytic Oxidizer

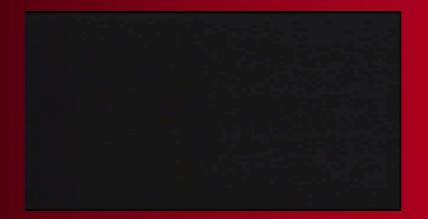


Regenerative TO - RTO



Poll Questions 7 & 8

MACT Case Study Video



Applicable Rules



 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 <u>ONE</u> Hazardous Air Pollutant or 25 tpy or more of any <u>COMBINED</u> 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

CoatingIb. HAP / gal solids*General1.9High Performance27.5Magnet Wire0.44Rubber-to-Metal6.8Fluoropolymer12.4

* 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

HHHHHH 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









Inspection

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

BY LAW LIDS MUST STAY STUT AT ALL TIMES

*(AS REQUIRED BY AIR QUALITY MANAGEMENT DISTRICT)

DO NOT OVERFILL

Booth Inspection



Booth Inspection



Violation?





Inspection

Check Pressure Drop (∆p) Across Filters





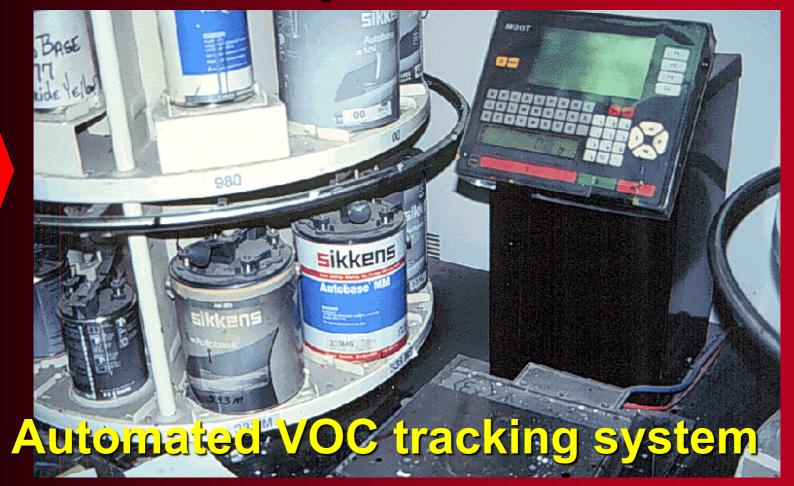
Check Filters. Dirty, Painted or Clogged?

Inside the Mixing Room





Inspection





Solvents

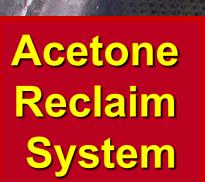
- Used for Cleaning
 - Tar
 - Prep for Plastic
 - Removing Adhesive



Inspection

Do we need a spray cap pressure gauge?



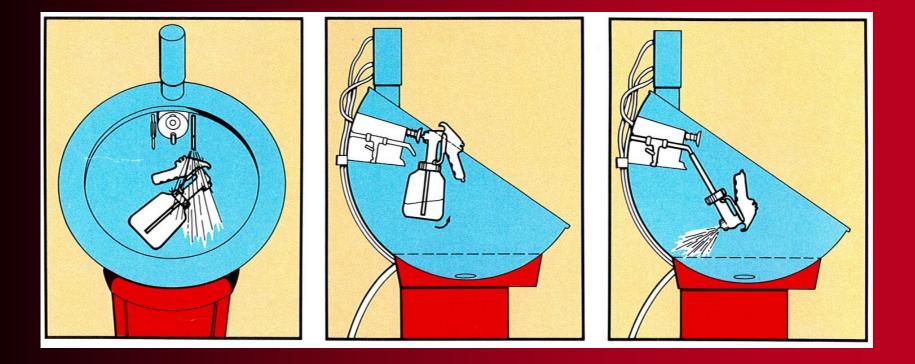


Inspection

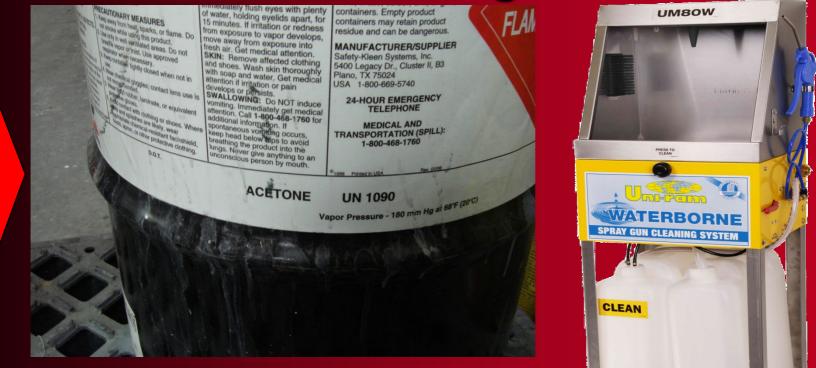
SAFETY-KLEEN Spray Gun Cleaner. Is this a covered or open container?



How The Gun Cleaner Works



Alternative Cleaning Solutions

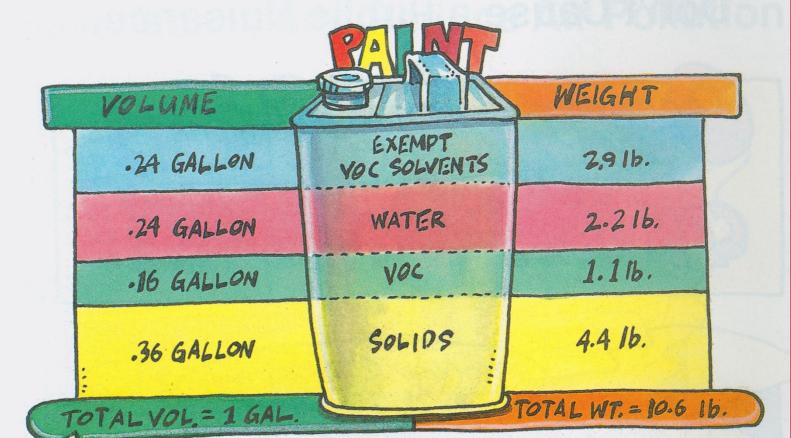


Recordkeeping Review

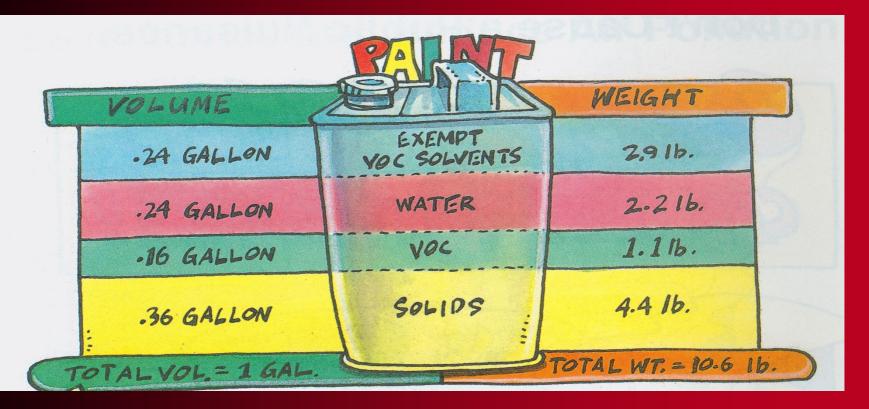
Longest Part of the Inspection Do They Keep Records ? Check Permit Requirements

AUTERIAL SAFETY MATA SHIETS

Time for Calculations



What is the VOC content of this coating?

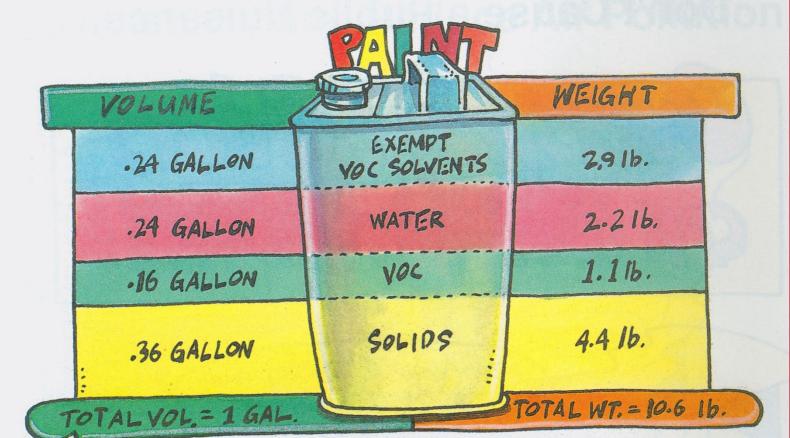


1.1 lbs VOC

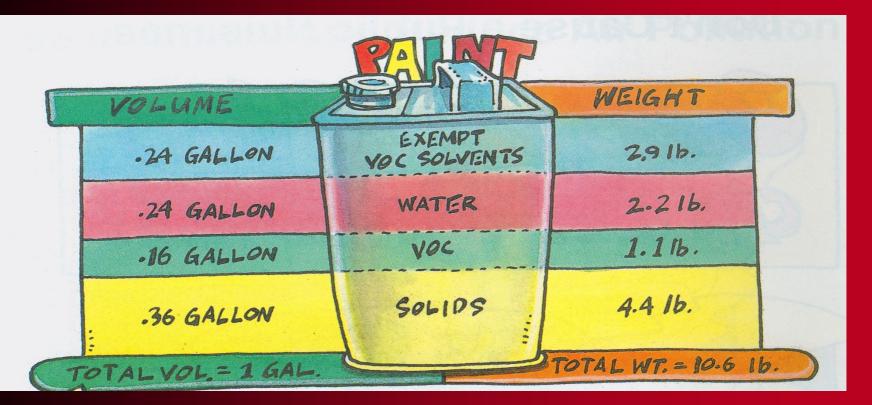
= 2.1 lbs/gal

(1 Gal - .24 gal - .24 gal)

Time for Calculations



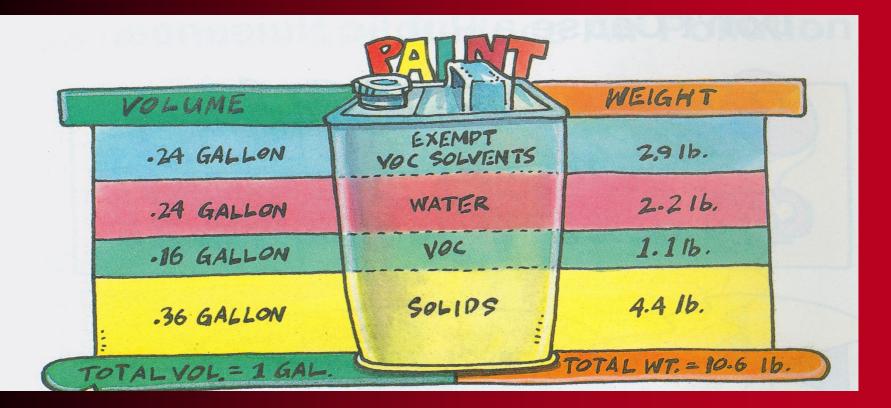
What is the HAP content of this coating?



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/.24)] - [2.2/(2.2/.24)] - [1.1/(1.1/.16)]

A Real World Application

centration is less than its applicable exposure minit. The nate is unknown. Follow respirator manufacturer's diis and electrical equipment must be explosion-proof and in areas where explosion hazards exist. VAPORS MAY is heaters, electric motors and other sources of ignition windows and doors to achieve cross-ventilation. Use only sshould wear chemical-resistant gloves, clothing and splashon exposed skin areas. Do not take internally. In the event buct, do so in accordance with instructions in ANSI Standard have hazards of all components. Before opening packages, alt material safety data sheet prior to use. Wash thoroughly

in breathing, leave the area to obtain fresh air. If continued intenced, get medical assistance immediately. In case of edutely flush eyes or skin with plenty of water for at least hemove contaminated clothing and shoes. Get medical Wash dothing before reuse. Destroy contaminated clothd shoes if necessary. If swallowed, do not induce vomitphysician immediately. RAGE AND DISPOSAL: If spilled contain spilled the

barninated absorbent, container a e of can in accordance with local, stal

This material is non-photochemic my reac-tive as defined by SCAOMD Rule 102.

KEEP OUT OF REACH OF CHILDREN



Series 394 Perimeprime (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	LDS/Gal
thinned	330	2.76
		3.18
nned 10% (No. 2 or 3 Thinner)	381	276
inned 10% (No. 49 Thinner)	330	Z.TO To handle:
	50% R.H.: To tou	ich: 1/4 hour. To handle
2 hours. To recoat: 2 hours. —AT	50°F (16°C). To to	uch: 1/4 hour. To handle:
/L	00 1 (10 0). 10	11 hour To harunc.

touch: 1/4 hour. To handle: 234 hours. To recoat: 234 hours. —AT 50°F (10°C): To touch: 34 hours. To handle: 5 hours. To recoat: 234 hours. —AT 50°F (10°C): To touch: 34 hours. To handle: 5 hours. To recoat: 5 hours. —AT 50°F (10°C): To touch: 4 hours to recoat: 5 hours. Curing time will vary with surface temperature, humidity and the touch at the humidity and film thickness. Note: When recoating Series 394 with topcoats other than the thickness. Note: When recoating Series 394 with topcoats other than itself, the minimum recoat time is 16 hours. Note: Series 44-710 Accelerator Accelerator must be used when the surface temperature falls below $50^{\circ}F(10^{\circ}C)$. STORAGE THE STO 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 sure the canter and the the can. Use a power mixer and keep material under constant agitation while mixing. mixina.

COVERAGE BATES

Unt

Thi

Thi

CU

11/2

- CIL TUA	Dry Mils	Wet Mils	Sq Ft/Gal
Suggested	(Microns)	(Microns)	(m²/Gal)
- Minimum	3.0 (75)	5.0 (125)	326 (30.3) 391 (36.4)
- Maximum	2.5 (65)	4.0 (100)	291 (30.4) 28A (26.4)

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

THINNING: For spray, thin up to 10% or 34 pint No. 2 Thinner if temperatures are below 80°F (2) pint (380 mL) per gallon with No. 3 Thinner if tem (27°C). For brush or roller, thin up to 10% or 34p Thinner. Note: No. 49 Thinner may be substituted POT LIFE: 24 hours at 77°F (25°C) and 50% RH cures with moisture acting as a catalyst incorporation ture laden air (humidity) during use will shorten po APPLICATION EQUIPMENT: Note: When interme

application; or when roller applied, by using 1/4 wor Fluid Tip

GUN DeVilbiss

Lbs/Gal

*(with heavy mastic spring) pressure pot at same level or

Time for Calculations

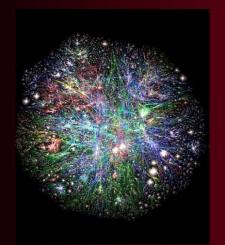
Coating VOC = 2.76 lbs/gal Thinner VOC = 7.27 lbs/gal

Our Operator uses it at 1% Mixture Rate

Time for Calculations

7.27 X .01 = .0727 lbs/gal VOC @ 1% Mixture Ratio

2.76 lbs/gal x .99 = 2.73 + .0727 = 2.80 lbs/gal



Websites

- epa.gov/stationary-sources-air-pollution/nationalemission-standards-hazardous-air-pollutantsneshap-9
- epa.gov/collision-repair-campaign
- nmfrc.org/
- ccar-greenlink.org
- paintcenter.org/

Questions?

