

**Small Business Environmental Assistance Program**

NYS Pollution Prevention Institute

Phone: 585-475-7869 | Email: sbeap@rit.edu

## Part 228-1 Surface Coating Processes Class B1 - Metal Furniture Coatings Class B4 - Miscellaneous Metal Parts Coatings (November 2022)

New York State’s Air Pollution Control Regulation for Surface Coating Processes, [6NYCRR Part 228-1](#), requires businesses that perform surface coating to use certain equipment and materials designed to reduce solvent emissions. Paints (including water based) and thinners typically contain some percentage of volatile organic compounds (VOC) that evaporate during the surface coating operations and contribute to the state’s air pollution problems such as the formation of ozone/smog.

- All facilities are subject to Part 228-1.3-General Requirements. (see FACTSHEET on General Requirements)
- VOC limits for compliant coatings were updated on May 15<sup>th</sup>, 2021. Most facilities in the New York City Metro Area & Lower Orange County must comply. (see Compliance Matrix)
- High efficiency application techniques such as High Volume Low Pressure (HVLP) spray guns are required.
- Applicability threshold for VOC Content Limits & High Efficiency application in Upstate New York area was lowered from 10 tons VOC/year Potential To Emit (PTE) to 3 tons VOC/year **ACTUAL**. **You can no longer “cap out”**. (see Compliance Matrix)

(see Compliance Matrix to determine applicability)

### VOC Content Limits

#### Part 228-1.4 Table B-1 - Metal Furniture Coating

Coating Categories	VOC Content Limits <sup>1</sup>	
	Baked	Air Dried <sup>2</sup>
	lb/gal	lb/gal
General, One Component	2.3	2.3
General, Multi-Component	2.3	2.8
Extreme High Gloss	3.0	2.8
Extreme Performance	3.0	3.5
Heat Resistant	3.0	3.5
Metallic	3.5	3.5
Pretreatment Coatings	3.5	3.5
Solar Absorbent	3.0	3.5

**Part 228-1.4 Table B-4 - Miscellaneous Metal Parts Coatings**

Coating Categories	VOC Content Limits <sup>1</sup>	
	Baked	Air Dried <sup>2</sup>
	lb/gal	lb/gal
General One-Component	2.3	2.8
General Multi-Component	2.3	2.8
Camouflage	3.5	3.5
Electric-Insulating Varnish	3.5	3.5
Etching Filler	3.5	3.5
Extreme High-Gloss	3.0	3.5
Extreme Performance	3.0	3.5
Heat-Resistant	3.0	3.5
High Performance Architectural	6.2	6.2
High Temperature	3.5	3.5
Metallic	3.5	3.5
Military Specification	2.3	2.8
Mold Seal	3.5	3.5
Pan Backing	3.5	3.5
Prefabricated Architectural Components	2.3	3.5
Pretreatment Coatings	3.5	3.5
Repair and Touch-up	3.0	3.5
Silicone Release	3.5	3.5
Solar-Absorbent	3.0	3.5
Vacuum-Metalizing	3.5	3.5
Drum Coating - New, Exterior	2.8	2.8
-New, Interior	3.5	3.5
-Reconditioned, Exterior	3.5	3.5
-Reconditioned, Interior	4.2	4.2

**Metal Furniture** - furniture or components of furniture constructed either entirely or partially from metal.

<sup>1</sup> Minus water and excluded compounds

<sup>2</sup> Cured at a temperature below 90°C (194°F)

**Equipment Requirements**

Facilities subject to either Table B1 or B4 must use high transfer efficiency application techniques such as High Volume Low Pressure (HVLP) spray, electrostatic spray, dip coating or other methods approved by NYS Dept. of Environmental Conservation (DEC) .

**Air Permitting/Registration**

In addition to complying with Part 228-1, many facilities will also need an Air Facility Registration (AFR) or State Facility Permit (SFP) under Part 201 issued by the DEC. The following Compliance Matrix is intended to be a guide to determine which facilities are required to apply for a DEC Registration/Permit under Part 201 and which sections to comply with under Part 228-1.

**Table 3 - Compliance Matrix**

Geographic Location	Facility Wide Actual Usage/Emissions	Regulatory Responsibility
<p>New York City Metropolitan Area. All of the city of New York, and Nassau, Suffolk, Westchester and Rockland Counties.</p> <p><b>And</b></p> <p>Lower Orange County Metropolitan Area. The area including the towns of Blooming Grove, Chester, Highlands, Monroe, Tuxedo, Warwick and Woodbury.</p>	<p><b>ONLY</b> apply coatings manually with brush, roller, cloth or aerosol can.</p>	<p>Exempt from Part 201 and 228-1.</p>
	<p>Use up to 55 gal or emit up to 400 lbs VOCs per any 12-months.</p>	<p>Exempt from Part 201. Must comply with Part 228-1.3-General Requirements only.</p>
	<p>Emit Less than 12.5 tons/yr VOCs.</p>	<p>Must comply with Part 228-1.3-General Requirements. Must comply with VOC content limits. (Table B-1 or Table B-4) Must use high transfer efficiency application techniques. Must have an Air Facility Registration certificate.</p>
	<p>Emit 12.5 tons/yr VOCs or more but less than 25 tons/yr VOCs.</p>	<p>Must comply with Part 228-1.3-General Requirements. Must comply with VOC content limits. (Table B-1 or Table B-4) Must use high transfer efficiency application techniques. Must have a State Facility Permit.</p>
<p>The rest of New York State</p>	<p><b>ONLY</b> apply coatings manually with brush, roller, cloth or aerosol can.</p>	<p>Exempt from Part 201 and 228-1.</p>
	<p>Use less than 25 gals. of coatings &amp; ALL solvents combined per month or emit 1,000 lbs. VOCs or less in any 12-month period.</p>	<p>Exempt from Part 201. Must comply with Part 228-1.3-General Requirements only.</p>
	<p>Emit Less than 3.0 tons/yr VOCs. (12-month period)</p>	<p>Must comply with Part 228-1.3-General Requirements only. Must have an Air Facility Registration certificate.</p>
	<p>Emit 3 tons/yr VOCs or more but less than 25 tons/yr VOCs. (12-month period)</p>	<p>Must comply with Part 228-1.3-General Requirements. Must comply with VOC content limits. (Table B-1 or Table B-4) Must use high transfer efficiency application techniques. Must have an Air Facility Registration certificate. State Facility Permit may be required under certain circumstances.</p>
	<p>Emit 25 tons/yr VOCs or more but less than 50 tons/yr VOCs. (12-month period)</p>	<p>Must comply with Part 228-1.3-General Requirements. Must comply with VOC content limits. (Table B-1 or Table B-4) Must use high transfer efficiency application techniques. Must have a State Facility Permit.</p>

**See 228 General Requirements FACTSHEET for a full list of record keeping requirements and other general requirements as outlined by 228-1.3.**