

Small Business Environmental Assistance Program

NYS Pollution Prevention Institute

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Part 228-1 Surface Coating Processes Class C: Wood Finishing (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 are now based on a ratio of pounds VOCs per pounds of solids as applied. Most facilities in the New York City Metropolitan Area & Lower Orange County must comply with the content limits which may require switching to a different coating.
- High Volume Low Pressure (HVLP) spray guns are required for facilities that must comply with the VOC content limits listed in Table C-1 or C-2 below, except for coatings with a VOC content of less than 1.0 lb VOC / lb solid or if the coating is used for touchup, repair or automated spray application.
- The applicability threshold for facilities in the Upstate New York area was lowered

(see full Compliance Matrix to determine applicability)

VOC Content Limits

If a facility must use coatings that comply with the new VOC limits (see Compliance Matrix on back) it must choose to comply with either Table C-1 (Low VOC Topcoats) **OR** Table C-2 (High Solids Sealers & Topcoats) seen at right. For example, if you choose to comply with Table C-1, then all of your topcoats must contain a maximum ratio of 0.80 lb VOCs / lb of solids. Table C-1, however, does not limit the VOC content of sealers or coatings other than topcoats.

Topcoat: any final coating applied to a wood or wood coated substrate.

Sealer: a coating which contains binders that seal a wood surface prior to application of a subsequent coating

Part 228-1.4 Table C-1

Coating Categories	VOC Content Limit lb VOC/lb solids ²
Topcoats	0.8

Part 228-1.4 Table C-2

Coating Categories	VOC Content Limit lb VOC/lb solids ²
Sealer	1.9
Topcoats	1.8
Acid-cured alkyd amino vinyl sealers	2.3
Acid-cured alkyd amino conversion varnish topcoats	2.0

1. This factsheet applies to all wood finishing coating lines except “Flat Wood Paneling” which is covered in Class B3 under Part 228-1
2. VOC Content limit is on an **as applied** basis

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 NYS Dept. of Environmental Conservation (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 NYC, and Nassau, Suffolk, Westchester and Rockland Counties.</p> <p>And</p> <p>Lower Orange County Metropolitan Area. The area including the towns of Blooming Grove, Chester, Highlands, Monroe, Tuxedo, Warwick, and Woodbury.</p>	<p>ONLY 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 1 or 2) Must use HVLP spray guns Must have an Air Facility Registration certificate under part 201</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 1 or Table 2) Must use HVLP spray guns Must have a State Facility Permit under Part 201 Must submit a work practice plan to minimize VOC emissions</p>
<p>The rest of New York State</p>	<p>ONLY 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 gal of coatings & 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 12.5 tons/yr VOCs (12-month period)</p>	<p>Must comply with Part 228-1.3-General Requirements only Cap-by-Rule out of Part 228-1.4 (no VOC Content limits) Must have an Air Facility Registration certificate. Must have a State Facility Permit.</p>
	<p>Emit 12.5 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 only Cap Out of Part 228-1.4 (no VOC Content limits) A State Facility Permit is required.</p>
	<p>Emit Less than 25 tons/yr VOCs. (12-month period). Don't want a SFP, so choosing to comply with Part 228-1.4, VOC content limits instead</p>	<p>Must comply with Part 228-1.3-General Requirements. Must comply with VOC content limits (Table 1 or Table 2) Must use HVLP spray guns (see front) Must have an Air Facility Registration Certificate</p>

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