

Small Business Environmental Assistance Program

NYS Pollution Prevention Institute

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Part 228-1 Surface Coating Processes General Requirements (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 surface coating processes are subject to Part 228-1.3 General Requirements **except for**:

1. coating lines used in research and development processes which produce a product for study rather than eventual sale;
2. coating lines where coatings are applied manually (by hand or without the use of mechanical means) with a brush, roller, cloth or an aerosol spray can;
3. coating lines which apply clear or translucent coatings to clear or translucent plastic substrates utilized in the manufacture of back-lighted outdoor signs;
4. coating lines which apply clear and pearlescent coatings to plastic fashion items such as beads, buttons, buckles or other plastic accessories;
5. coating lines used in the manufacture of optical lenses at a facility whose annual potential to emit VOCs is 10 tons or less;
6. coating lines which apply reflective coatings to highway cones;
7. coating lines which apply electromagnetic interference/radio frequency interference (EMI/RFI) coatings on plastic electronic equipment to provide shielding against electromagnetic interference, radio frequency interference, or static charge;
8. coating lines which apply electric dissipating coatings used to rapidly dissipate a high voltage electric charge applied on plastic parts;

General Requirements

Opacity (the degree to which smoke can obscure the view of an object in the background) must be less than **20%** in any consecutive six-minute period from any coating process emission source.

Records must be maintained at the facility for a period of five years and be provided to the DEC upon request.

These records must include:

- Material Safety Data Sheet (SDS)
- VOC content of each coating as applied (Tech. Sheet)
- Purchase and production records/receipts (monthly)
- Coating usage records on an as used basis when necessary
- Equipment information as needed to determine compliance such as:

- i. Spray gun type
- ii. Spray booth air exhaust volume
- iii. Filter type and efficiency
- iv. Control device overall removal efficiency when applicable

Handling, storage and disposal

Within the work area(s) associated with a coating line, the owner or operator of a facility subject to this Subpart must:

- use closed, non-leaking containers to store or dispose of spent or fresh VOC solvents, including cloth or other absorbent applicators impregnated with VOC solvents, that are used for surface preparation, cleanup or coating removal;
- **not** use open containers to store or dispense surface coatings and/or inks unless production, sampling,

maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate.

- minimize spills during the handling and transfer of coatings and VOC solvents; and
- clean hand held spray guns by one of the following:
 - i. an enclosed spray gun cleaning system that is kept closed when not in use;
 - ii. non-atomized discharge of VOC solvent into a paint waste container that is kept closed with not in use;
 - iii. disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or
 - iv. Atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions

Note: While most facilities clean their spray guns by disassembling or using a gun cleaning unit, this is now required for all facilities.

PLEASE NOTE The requirements listed in this fact sheet are the general requirements that ALL surface coaters must comply with. Your coating process may be subject to additional regulatory requirements under Part 228-1, including but not limited to, the need for an air permit/registration, compliance with coating VOC content limits and high transfer efficiency coating application techniques.

Refer to 228-1 Wood Finishing, 228-1 Metal Finishing, and Air Pollution Control Requirements for Automotive Finishing for more detailed requirements for each of these applications.

Contact the SBEAP if you need help determining your facility's requirements or obtaining an air permit.