

EXAMPLE CHECKLIST

Use this form as a quick guide to check what compliance options you have available under the rule.

! Step 1: Do you perform any of the following processes:

- CLEANING OPERATIONS** (go to STEP 2)
 - " General cleaning
 - " Hand-wipe cleaning
 - " Spray gun cleaning
 - " Flush cleaning

- PAINTING OPERATIONS, ORGANIC HAP** (go to STEP 3)
 - " Primer application
 - " Top coat application
 - " Self priming top coat application

- DEPAINTING OPERATIONS** (go to STEP 4)
 - " Non-chemical (ex. Sanding)
 - " Stripping
 - " Blasting

- CHEMICAL MILLING MASKANT OPERATIONS** (go to STEP 5)

! STEP 2: Cleaning Operations

General Cleaning Operations (2 options exist):

Do you use *aqueous solvents* that meet all of the following
(Use Option 1):

- " are \$80% water
- " has a flash point > 200°F
- " are miscible with water

Do you use *hydrocarbon based solvents* that meet all of the following
(Use Option 1):

- " are photochemically reactive hydrocarbons and/or oxygenated hydrocarbons
- " has a maximum vapor pressure of 7 mm Hg at 20°C
- " contain no HAPs

Do you *take precautions* to prevent spills by doing all of the following
(Use Option 2):

- " place absorbents in bags or closed containers
- " keep containers closed at all times
- " handle solvents to minimize spills

! Step 2: Cleaning Operations cont

Hand Wipe Cleaning Operations (3 options exist):

See Example Hand-Wipe Cleaning Recordkeeping Form

Do you use *aqueous solvents* that meet all of the following
(Use Option 1):

- " are \$80% water
- " has a flash point > 200°F
- " are miscible with water

Do you use *hydrocarbon based solvents* that meet all of the following
(Use Option 1):

- " are mixtures of photochemically reactive hydrocarbons and/or oxygenated hydrocarbons
- " has a maximum vapor pressure of 7 mm Hg at 20°C
- " contain no HAPs

Do you use solvents with a *composite vapor pressure* of
(Use Option 2):

- " 45 mm Hg or less at 20°C

Have you reduced your solvent usage by (Use Option 3):

- " at least 60%

! Step 2: Cleaning Operations cont

Spray Gun Cleaning Operations (1 option exists):

See Example Spray Gun Cleaning Recordkeeping Form

Do you clean your guns using one of the following techniques (only Option):

- " Enclosed system
- " Nonatomized cleaning
- " Atomized cleaning
- " Disassembled cleaning

Flush cleaning Operations (2 options exist):

See Example Flush Cleaning Recordkeeping Form

Do you use *aqueous solvents* that meet all of the following (Use Option 1):

- " are \$80% water
- " has a flash point > 200°F
- " are miscible with water

Do you use *hydrocarbon based solvents* that meet all of the following (Use Option 1):

- " are photochemically reactive hydrocarbons and/or oxygenated hydrocarbons
- " has a maximum vapor pressure of 7 mm Hg at 20°C
- " contain no HAPs

Do you *take precautions* to prevent spills by doing all of the following (Use Option 2):

- " flush solvent into an enclosed container
- " keep the container closed

! Step 3: Painting Operations

See Example Primer and Topcoat Recordkeeping Form

Inorganic HAP emissions (4 options exist):

Do you *apply all coatings* in at least one of the following ways (All Options):

- " flow/curtain coating operations
- " dip coating application
- " roll coating
- " brush coating
- " cotton-tipped swab application
- " electrodeposition coating
- " HVLP spraying
- " electrostatic spray application
- " other which is equivalent to HVLP

Do you use coatings that have a maximum VOC/HAP content of (Use Option 1):

- " 350 g/L (primers)
- " 420 g/L (topcoats)

Do you use coatings that have a maximum VOC/HAP content of (Option 2) [found in 63.752(c)(3)]:

- " 250 g/L (primers)
- " 420 g/L (topcoats)

Do you use control equipment that meets all of the following (Use Option 4):

- " has a control efficiency of $\geq 81\%$
- " has undergone an initial performance test

If your painting operations does fit into Option 1, 2 or 4, then you may be able to use Option 3, coating averaging.

! Step 3: Painting Operations cont

Inorganic HAP emissions (2 options exists):

When you paint, do you pass air through either a:

- " dry filter system (Use Option 1)
- " waterwash system (Use Option 2)

! Step 4: Depainting Operations (4 options exist)

Is all your nonchemical depainting equipment (Use Option 1):

- " operated in accordance with the manufacturer's instructions

When dry media blasting, do you do one of the following (Use Option 2):

- " blast in an enclosed area (existing sources)
- " pass air through a dry filter (new or existing sources)
- " pass air through a baghouse (new or existing sources)
- " pass air through a waterwash system (new or existing sources)

When HAP-containing chemical stripper is used, do you (Use Option 3):

- " use a control system that reduces organic HAP emissions
\$81% for existing; \$95% for new

If you spot strip, do you (Use Option 4):

- " use #26 gal/yr stripper if working on commercial aircraft
- " use #50 gal/yr stripper if working on military aircraft

! Step 5: Chemical Milling Maskant (2 options exist)

Do you use maskant that have a maximum VOC/HAP content of
(Option 1):

- " 622 g/L Type I
- " 160 g/L for Type II

Do you use control equipment that meets all of the following
(Use Option 2):

- " has a control efficiency of 81%
- " has undergone an initial performance test