

Note: While these questions and answers constitute the best available information at this time, the EPA recommends that you consult your State or local air pollution control agency for any final determinations. State and local agencies may implement provisions that are more stringent than those contained in the NESHAP.

Aerospace NESHAP Q&A's

(1/2001)

Q1: Are aircraft exterior washing operations covered under hand wipe or flush cleaning?

A1: You may be subject to the hand-wipe cleaning or flush cleaning operations depending on how your aircraft exterior washing operations are performed. If you remove contaminants such as dirt, grease, oil and coating from an aerospace vehicle by physically rubbing it with materials such as a rag that has been moistened with a cleaning solvent, then you're covered under section 63.744(b) - hand wipe cleaning. If however, you remove contaminants such as dirt, grease, oil and coating from an aerospace vehicle by passing solvent over the exterior of the aircraft, then you're covered under section 63.744(d) - flush cleaning operations.

Q2: We have a cleaning operation where a cleaner is pumped from a drum onto parts to be cleaned, then the parts are scrubbed and the remaining solvents are drained back into the drum. Is this operation covered under Subpart GG?

A2: Yes, from your description, this operation would be covered as a flush cleaning operation under 63.744(d). Flush cleaning, as defined under 63.744(d), doesn't require the actual cleaning to be performed in an enclosed container. It only requires that the used cleaning solvent is emptied/directed into a container/collection system that is kept closed when not in use.

Q3: Under 63.750(a), data provided by the manufacturer for cleaning solvents use must "identify all components of cleaning solvents," does this include non-hazardous components?

A3: Chemical compositions that are not a Hazardous Air Pollutant (HAP) and Volatile Organic Compound (VOC) are not required unless the composition information is needed to complete calculations under 63.750. In addition, under section 63.741, cleaning solvents (as well as primers, topcoats, maskants, and strippers) that contain VOC and HAP <1% non-carcinogens or <0.1% carcinogens aren't covered under the NESHAP.

Q4: Must Method 24 be used or can manufacturers use other data to determine the VOC and HAP content? Do we need to require manufacturers to use Method 24 and supply results?

A4: Under 63.750(c)(a), the total organic HAP content for coatings that contain no exempt solvents, can be obtained by using manufacturer supplied data **OR** Method 24. The decision to require that a manufacturer perform Method 24 needs to be determined by the facility. You should be aware, however, that if formulation data is used for determining compliance and there is a discrepancy between formulation data and Method 24, Method 24 prevails.