Aerospace NESHAP Reporting Requirements
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Updated February 13, 2001

Summary of Reporting Requirements in the Aerospace NESHAP (40 CFR 63 Subpart GG)		
Reporting Requirements as Stated in EPA Implementation Guide EPA 456/R-97-006 January 2001 Update	**Reporting Requirements as Stated in Aerospace NESHAP 40 CFR 63 Subpart GG**	**Compliance Options Referenced in the Reporting Requirements as Stated in EPA 456/R-97-006 January 2001 Update**
Cleaning Operations - General Requirements		
All Options, semiannual report (every 6 months from the date of notification of compliance status) which includes [63.753(b)]: ❖ if the operation has been in compliance for the semiannual period, a statement that the cleaning operations have been in compliance ❖ the statement must be signed by a responsible official Reporting of noncompliance is covered under the hand-wipe, flush, and spray gun cleaning sections.	40 CFR 63.753(b)(1) Semiannual reports occurring every 6 months from the date of the notification of compliance status that identify: 40 CFR 63.753(b)(1)(v) If the operations have been in compliance for the semiannual period, a statement that the cleaning operations have been in compliance with the applicable standards. Sources shall also submit a statement of compliance signed by a responsible company official certifying that the facility is in compliance with all applicable requirements.	**Option 1**: Use cleaning solvents that meet the requirements in the following table [63.744(a)]: **Solvent Type - Composition Requirements** Aqueous ❖ •Cleaning solvents in which water is the primary ingredient (80% of cleaning solvent solution as applied must be water) ❖ •Aqueous solutions must have a flash point >200 F (93 C) as reported by the manufacturer ❖ •Solution must be miscible with water Hydrocarbon-Based ❖ •Cleaners that are composed of photochemically reactive hydrocarbons and, or oxygenated hydrocarbons ❖ •Have a maximum vapor pressure (VP) of 7 mm Hg at 20 C (3.75 in. H2O at 68 F) ❖ •Contain no HAP **Option 2:** If you use a solvent that don't meet the requirements in Option 1, do all of the following [63.744(a)]: ❖ place solvent-laden cloth, paper or other absorbent applicators in bags or other closed containers after you've finished using them (cotton-tipped swabs used for very small cleaning operations are exempt from this requirement) ❖ keep containers closed at all times, except when depositing or removing materials (cotton-tipped swabs used for very small cleaning operations are exempt from this requirement) ❖ store fresh and spent solvents in closed containers (except semi-aqueous cleaners) ❖ handle and transfer solvents to, or from cleaning operations, and to waste handling areas in a manner that minimizes spills

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Hand Wipe Cleaning		
Report **all** of following information **semiannually** (every 6 months from date of notification of compliance status) based on the option you use [63.753(b)]: **If Option 1 or 2 is used** [63.744(b)(1), (2)]: ❖ any instance where a noncompliant cleaning solvent is used for a nonexempt hand-wipe cleaning operation ❖ a list of any new cleaning solvents used for hand-wipe cleaning in the previous 6 months, including evidence of their compliance (such as composite VP or notification that they comply with the composition requirements) **If Option 3 is used** [63.744(b)(3)]: ❖ none, but, submit your alternative plan to your permitting authority for approval.	40 CFR 63.753(b)(1)(i) Any instance where a noncompliant cleaning solvent is used for a non-exempt hand-wipe cleaning operation; 40 CFR 63.753(b)(1)(ii) A list of any new cleaning solvents used for hand-wipe cleaning in the previous 6 months and, as appropriate, their composite vapor pressure or notification that they comply with the composition requirements specified in §63.744(b)(1);	**Option 1**: Use cleaning solvents that satisfy Option 1 under "Cleaning Operations" [63.744(b)(1)] **Option 2:** Use a cleaning solvent with a composite vapor pressure of 24.1 in. H_2O (45 mm Hg) or less at 68 F (20 C) [63.744(b)(2)]. Determine composite vapor pressure by following 63.750(b) **Option 3:** Demonstrate that the volume of hand-wipe cleaning solvent usage has been reduced by at least 60 percent from an approved baseline that is adjusted for production. Calculate the baseline by using 1996 and 1997 data, or as otherwise agreed upon by the your permitting agency. The baseline must be approved by the EPA or your permitting agency and be included as part of your title V or Part 70 permit [63.744(b)(3)]
Spray Gun Cleaning		
Report **all** of following information **semiannually** (every 6 months from date of notification of compliance status) based on the option you use [63.753(b)]: **If Option 1 is used** [63.753(b)(1)(iii), (iv)]: ❖ any instance where a noncompliant spray gun cleaning method is used ❖ any instance where a leaking enclosed spray gun cleaner remains unrepaired and in use for more than 15 days **If Option 2, 3, or 4 is used**, no reporting required.	40 CFR 63.753(b)(1)(iii) Any instance where a noncompliant spray gun cleaning method is used; 40 CFR 63.753(b)(1)(iv) Any instance where a leaking enclosed spray gun cleaner remains unrepaired and in use for more than 15 days; and	**Option 1:** Enclosed System [63.744(c)(1)(i)] ❖ clean spray gun in an enclosed system that is leak checked on a monthly basis. Enclosed systconsits of forcing cleaning solvent through the gun. **Option 2:** Nonatomized Cleaning [63.744(c)(2)] ❖ without the use of atomizing air, clean the spray gun by placing cleaning solvent into a pressure pot and forcing the solvent through the spray gun into a waste container that is closed when not in use **Option 3:** Disassembled Gun Cleaning [63.744(c)(3)] ❖ clean the disassembled spray gun by hand or by soaking in a vat that is closed when not in use or during soaking **Option 4:** Atomized Cleaning [63.744(c)(4)] ❖ force cleaning solvent through the gun and spray directly into a waste container that is fitted with a device to capture the atomized solvent
Flush Cleaning		
You don't have any reporting requirements under this section.	N/A	**Option 1**: Use only cleaning solvents that satisfy Option 1 under "Cleaning Operations"; **OR** are semi-aqueous cleaners (a solution in which 60% of the solvent solution as applied is water) [63.744(d)] **Option 2:** If cleaning solvent used does not meet the requirements in Option 1, do the following [63.744(d)]: ❖ empty flushed solvent into an enclosed container or collection system **OR** into a system with equivalent emission control ❖ keep your collection system closed when not in use

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Primer and Topcoat Operations (Organic HAP and VOC Control)		
All Options, report the following (except for the use of waterborne coatings) [63.753(c)]: ❖ Semiannual reports occurring every 6 months (from the date of notification of compliance status) that identify required reporting for each painting category ❖ If the operations have been in compliance for the semiannual period, a statement that the operations have been in compliance with the applicable standards **If Option 1 or 2 is used**, report the following: [63.753(c)(1)(i)] ❖ Each value of H_i and G_i that exceeds the applicable organic HAP or VOC content limit **If Option 3 is used**, report the following: [63.753(c)(1)(ii)] ❖ Each value of H_a and G_a that exceeds the applicable organic HAP or VOC content limit **If Option 4 is used**, report the following: [63.753(c)(1)(iii), (iv)] Control device is incineration: ❖ All periods when the 3-hour average combustion temperature is less than the average combustion temperature established during the most recent performance test Control device is a carbon adsorber: ❖ Each rolling period when the overall control efficiency of the control system is less than 81%, the initial material balance calculation and any exceedance as demonstrated through calculations Control device is a nonregenerative carbon adsorber: ❖ Submit the design evaluation, the continuous monitoring system performance report, and any excess emissions as demonstrated through deviations of monitored values	40 CFR 63.753(c) Primer and topcoat application operations. Each owner or operator of a primer or topcoat application operation subject to this subpart shall submit the following information: 40 CFR 63.753(c)(1) Semiannual reports occurring every 6 months from the date of the notification of compliance status that identify: 40 CFR 63.753(c)(1)(vii) If the operations have been in compliance for the semiannual period, a statement that the operations have been in compliance with the applicable standards; and, 40 CFR 63.753(c)(1)(i) For primers and topcoats where compliance is not being achieved through the use of averaging or a control device, each value of H_i and G_i, as recorded under §63.752(c)(2)(i), that exceeds the applicable organic HAP or VOC content limit specified in §63.745(c); 40 CFR 63.753(c)(1)(ii) For primers and topcoats where compliance is being achieved through the use of averaging, each value of H_a and G_a, as recorded under §63.752(c)(4)(i), that exceeds the applicable organic HAP or VOC content limit specified in §63.745(c); 40 CFR 63.753(c)(1)(iii) If incinerators are used to comply with the standards, all periods when the 3-hour average combustion temperature(s) is (are) less than the average combustion temperature(s) established under §63.751(b)(11) or (12) during the most recent performance test during which compliance was demonstrated; 40 CFR 63.753(c)(1)(iv) If a carbon adsorber is used; 40 CFR 63.753(c)(1)(iv)(A) each rolling period when the overall control efficiency of the control system is calculated to be less than 81%, the initial material balance calculation, and any exceedances as demonstrated through the calculation; or, 40 CFR 63.753(c)(1)(iv)(B) for nonregenerative carbon adsorbers, submit the design evaluation, the continuous monitoring system performance report, and any excess emissions as demonstrated through deviations of monitored values.	**All Options:** Use the following application equipment and housekeeping measures: ❖ Handle and transfer primers and topcoats in a manner to minimize spills [63.745(b)] ❖ Apply coatings using one or more of the following application techniques [63.745(f)]: ➢ Flow/curtain coating ➢ Dip coat application ➢ Roll coating ➢ Brush coating ➢ Cotton-tipped swab application ➢ Electrodeposition (dip) coating ➢ HVLP spraying ➢ Electrostatic spray application ➢ Other application methods that achieve emission reductions equivalent to HVLP or electrostatic spray. You must follow 63.750(i) when making this determination ❖ Operate application devices according to company procedures, local specified operating procedures, and, or manufacturer's specifications [63.745(f)(2)] ❖ If application equipment is modified, maintain a transfer efficiency equal to HVLP and electrostatic spray [63.745(f)(2)] **Option 1:** Uncontrolled, compliant coatings. Use primers and topcoats that comply with the limits below (not shown) [63.745(c)]: **Option 2:** Uncontrolled, low HAP coatings. Use "low HAP content" coatings that comply with the limits below (not shown) [63.752(c)(3)]. Option 2 provides reduced recordkeeping and reporting: **Option 3:** Uncontrolled, averaged coatings. Average coatings in a manner that meets all of the following criteria [63.745(e)(2). 63.743(d)]: ❖ Use any combination of uncontrolled primers or topcoats such that the monthly volume-weighted average of organic HAP and VOC content of the combination of primers and topcoats complies with the content limits in 63.745(c), which is the same as Option 1. Only uncontrolled primers and topcoats can use this option. The permitting agency can specify a shorter averaging period than monthly [63.743(d)] ❖ Averaging primers together with topcoats is not allowed ❖ Averaging schemes must be pre-approved by the permitting authority as adopted as part of your title V operating permit

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Primer and Topcoat Operations (Organic HAP and VOC Control)		
Control device is something <u>other than an incinerator or carbon adsorber</u>: ❖ Each exceedance of the operating parameters established for the control device under the initial performance test during which compliance was demonstrated **<u>If Option 5 is used</u>**, no reporting is required.	40 CFR 63.753(c)(1)(v) For control devices other than an incinerator or carbon adsorber, each exceedance of the operating parameter(s) established for the control device under the initial performance test during which compliance was demonstrated;	**<u>Option 4:</u>** Controlled Coatings. Use add-on controls that meet all of the following criteria [63.745(d)]: *Note: You may use air pollution control devices not listed in the rule, but to do so, you must submit information about the system you wish to use no later than 120 days prior to the compliance date. See 63.743(c) for additional information.* ❖ Demonstrate an overall removal efficiency (of both organic HAP and VOC) of 81%. Overall efficiency is the product of the capture efficiency and the destruction or removal efficiency. Capture and destruction efficiency is determined by following 63.750(g) if your control device is a carbon adsorber, or 63.750(h) whenever a control device other than a carbon adsorber is used ❖ Conduct initial performance test unless a waiver is obtained [63.749(d)(2)] **<u>Option 5</u>:** Waterborne Coatings: Use waterborne coatings that meet all of the following criteria [63.741(i)]: *Note: Waterborne coatings are exempted from the following sections of the rule if they meet the organic HAP and VOC content limits in 63.745(c): 63.745(d) [control devices], 64.745(e) [compliant coatings], 63.749(d) [performance tests], 63.750(c)-(h) [HAP and VOC content determination], 63.752(c) [organic HAP and VOC recordkeeping], and 63.753(c) [primer and topcoat reporting].* ❖ Maintain manufacturer's data and annual purchase records for 5 years ❖ Waterborne coatings may be averaged under 63.743(d)

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Primer and Topcoat Operations (Inorganic HAP Control)		
All Options, report the following [63.753(c)]: ❖ Semiannual reports occurring (every 6 months from the date of notification) for each category ❖ If the operations are in compliance, a statement that the operations have been in compliance. **If dry filters are used**, report the following [63.753(c)(1)(vi), (c)(2)]: ❖ (Semiannual) All times when a topcoat or primer operation was not immediately shut down when the pressure drop across a dry particulate filter system was recorded to be outside specified limits ❖ (Annual) Number of times the pressure drop for each dry filter was outside specified limits **If a convential waterwash system is used**, report the following [63.753(c)(1)(vi), (c)(2)]: ❖ (Semiannual) All times when a topcoat or primer operation was not immediately shut down when the waterwash system was recorded to be outside specified limits ❖ (Annual) Number of times the water flow rate for each waterwash system was outside specified limits **If a pumpless waterwash system is used**, report the following [63.753(c)(1)(vi), (c)(2)]: ❖ (Semiannual) All times when a topcoat or primer operation was not immediately shut down when the waterwash system was recorded to be outside specified limits ❖ (Annual) Number of times the recommended parameters for each waterwash system was outside specified limits	40 CFR 63.753(c) Primer and topcoat application operations. Each owner or operator of a primer or topcoat application operation subject to this subpart shall submit the following information: 40 CFR 63.753(c)(1) Semiannual reports occurring every 6 months from the date of the notification of compliance status that identify: 40 CFR 63.753(c)(1)(vii) If the operations have been in compliance for the semiannual period, a statement that the operations have been in compliance with the applicable standards; and, 40 CFR 63.753(c)(1)(vi) All times when a primer or topcoat application operation was not immediately shut down when the pressure drop across a dry particulate filter or HEPA filter system, the water flow rate through a conventional waterwash system, or the recommended parameter(s) that indicate the booth performance for pumpless systems, as appropriate, was outside the limit(s) specified by the filter or booth manufacturer or in locally prepared operating procedures; [§63.753(c)(1)(vi) amended at 63 FR 46535, Sept. 1, 1998] 40 CFR 63.753(c)(2) Annual reports beginning 12 months after the date of the notification of compliance status listing the number of times the pressure drop or water flow rate for each dry filter or waterwash system, as applicable, was outside the limit(s) specified by the filter or booth manufacturer or in locally prepared operating procedures. See 40 CFR 63.753(c)(1)(vi) above. See 40 CFR 63.753(c)(2) above. See 40 CFR 63.753(c)(1)(vi) above. See 40 CFR 63.753(c)(2) above.	All covered coating operations must be conducted in a spray booth or hangar. Air flow must be downward or across the part and must be exhausted through a control device [63.745(g)]. *Note: You may use air pollution control devices not listed in the rule, but to do so, you must submit information about the system you wish to use no later than 120 days prior to the compliance date. See 63.743(c) for additional information.* Control Device Options for **Existing Sources** [63.745(g)(2)(i)]: **Option 1**: Pass air through a dry particulate filter that meets the *existing source* filtration efficiencies below (not shown) [63.745(g)(2)(i)(A)] **Option 2**: Pass air through a waterwash system [63.745(g)(2)(i)(B)] **Option 3:** Use another control system that meets efficiencies in Option 1 and is approved by the permitting authority [63.745(g)(2)(i)(C)] Control Device Options for **New Sources** [63.745(g)(2)(ii)]: **Option 1:** Pass air through a dry filter that meets *new source* filtration efficiencies below (not shown) [63.745(g)(2)(ii)(A)]: **Option 2:** Use another control system that meets *new source* efficiencies and is approved by the permitting authority [63.745(g)(2)(ii)(B)] Control Device Options for Sources Constructed or Reconstructed **After June 6, 1994 and prior to October 29, 1996** [63.745(g)(2)(iii)]: **Option 1**: Pass air through a 2-stage dry filter or a waterwash system before exhausting it to the atmosphere [63.745(g)(2)(iii)(A)] **Option 2:** For primers or topcoats containing *chromium or cadmium*, install a HEPA filter system, 3-stage filter system, or approved system equivalent to a 3-stage filter [63.745(g)(2)(iii)(B)]

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Primer and Topcoat Operations (Inorganic HAP Control)		
For booths or hangars that do not have the potential to emit 10 tons/yr or more of an individual inorganic HAP or 25 tons/yr or more of all inorganic HAP combined [63.743(a)(10)]: Notify the Administrator of such construction or reconstruction on an annual basis. Make notification by March 1 of each year for construction or reconstruction during the prior calendar year and include information in 63.5(b)(4), except that such information is to be limited to inorganic HAP	40 CFR 63.743(a)(10) For the purposes of compliance with the requirements of §63.5(b)(4) of the General Provisions and this subpart, owners or operators of existing primer or topcoat application operations and depainting operations who construct or reconstruct a spray booth or hangar that does not have the potential to emit 10 tons/yr or more of an individual inorganic HAP or 25 tons/yr or more of all inorganic HAP combined shall only be required to notify the Administrator of such construction or reconstruction on an annual basis. Notification shall be submitted on or before March 1 of each year and shall include the information required in §63.5(b)(4) for each such spray booth or hangar constructed or reconstructed during the prior calendar year, except that such information shall be limited to inorganic HAP's. No advance notification or written approval from the Administrator pursuant to §63.5(b)(3) shall be required for the construction or reconstruction of such a spray booth or hangar unless the booth or hangar has the potential to emit 10 tons/yr or more of an individual inorganic HAP or 25 tons/yr or more of all inorganic HAP combined. [§63.743(a)(10) added at 63 FR 15018, March 27, 1998]	

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Depainting Operations		
All Options, report the following [63.753(d)(1)(i), (viii), (ix)]:	40 CFR 63.753(d) Depainting operation. Each owner or operator of a depainting operation subject to this subpart shall submit the following information:	**Option 1:** Use non-HAP chemical strippers that meet all of the following requirements [63.746(b)(1)]: ❖ Emit no organic HAP from chemical stripping formulations, agents, or chemical paint softeners
Report **semiannually** (every 6 months from the date of notification of compliance status): ❖ If the operations have been in compliance, a statement that the operations have been in compliance	40 CFR 63.753(d)(1) Semiannual reports occurring every 6 months from the date of the notification of compliance status that identify: 40 CFR 63.753(d)(1)(ix) If the depainting operation has been in compliance for the semiannual period, a statement signed by a responsible company official that the operation was in compliance with the applicable standards.	**Option 2**: Use nonchemical based equipment that meet all of the following requirements: [63.746(b)(2)]: *Note: You may use air pollution control devices not listed in the rule, but to do so, you must submit information about the system you wish to use no later than 120 days prior to the compliance date. See 63.743(c) for additional information.* ❖ Operate and maintain equipment in accordance with manufacturer's specifications or locally prepared operating procedures ❖ During periods of malfunction, substitute materials may be used during the repair period ➢ Use substitutes no more than 15 days annually, unless organic HAP-free ➢ Substitutes selected shall minimize HAP emissions For dry media blasting systems generating airborne inorganic HAP emissions [63.746(b)(4)], comply with all of the following: ❖ Perform depainting operations in an enclosed area (unless a closed-cycle system is used) ➢ For *existing sources*, pass exhaust air through a dry particulate filter system meeting *existing source* filter efficiencies (as identified in "Primer and Topcoat Operations - Inorganic HAP Control"), or through a baghouse or though a waterwash system prior to exhausting to the atmosphere ➢ For *new sources*, pass exhaust air through a dry particular filter system meeting *new source* filter efficiencies (as identified in "Primer and Topcoat Operations - Inorganic HAP Control"), or through a baghouse prior to exhausting to the atmosphere ➢ For *sources constructed or reconstructed after June 6, 1994 and prior to October 29,1996*, pass air through a 2-stage dry filter or a waterwash system before exhausting it to the atmosphere [63.745(g)(2)(iii)(A)]. For primers or topcoats containing *chromium or cadmium*, install a HEPA filter system, 3-stage filter system, or approved system equivalent to a 3-stage filter [63.745(g)(2)(iii)(B)]
❖ A list of new and discontinued aircraft models depainted at the facility ❖ A list of parts normally removed for depainting for each new aircraft model being depainted	40 CFR 63.753(d)(1)(viii) A list of new and discontinued aircraft models depainted at the facility over the last 6 months and a list of the parts normally removed for depainting for each new aircraft model being depainted; and	
❖ Any 24-hour period where organic HAP were emitted from the depainting of an aerospace vehicle (other than when a control device was used)	40 CFR 63.753(d)(1)(i) Any 24-hour period where organic HAP were emitted from the depainting of aerospace vehicles, other than from the exempt operations listed in §63.746(a), (b)(3), and (b)(5).	
For spot stripping and decal removal, report the following [63.753(d)(2)(i)]: Report **annually**: ❖ The average volume per aircraft of organic HAP-containing chemical strippers or weight or organic HAP used for spot stripping and decal removal operations when depainting limits in 63.746(b)(3) or weight of organic HAP are exceeded	40 CFR 63.753(d)(2) Annual reports occurring every 12 months from the date of the notification of compliance status that identify: 40 CFR 63.753(d)(2)(i) The average volume per aircraft of organic HAP-containing chemical strippers or weight of organic HAP used for spot stripping and decal removal operations if it exceeds the limits specified in §63.746(b)(3); and [§63.753(d)(2)(i) amended at 63 FR 15023, March 27, 1998]	
For booths or hangars that do not have the potential to emit 10 tons/yr or more of an individual inorganic HAP or 25 tons/yr or more of all inorganic HAP combined [63.743(a)(10)]: Notify the Administrator of such construction or reconstruction on an annual basis. Make notification by March 1 of each year for construction or reconstruction during the prior calendar year and include information in 63.5(b)(4), except that such information is to be limited to inorganic HAP	See 40 CFR 63.743(a)(10) above.	
If Option 1 or 2 is used, report the following [63.753(d)(1)(v), vi)]: Report **semiannually**: ❖ Any new nonchemical depainting technique used at the facility since the notification of compliance status or any subsequent semiannual report	40 CFR 63.753(d)(1)(v) Any new non-chemical depainting technique in use at the facility since the notification of compliance status or any subsequent semiannual report was filed;	**Option 3**: Organic HAP-containing chemical stripper [63.746(c)]: *Note:You may use air pollution control devices not listed in the*

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Depainting Operations		
❖ Any periods of equipment malfunction ➢ The nonchemical method or technique that malfunctioned ➢ The date the malfunction occurred ➢ A description of the malfunction ➢ The methods used to depaint during the malfunction period and dates begun and discontinued ➢ The date the malfunction was corrected. **<u>If Option 2 is used</u>**, also report the following [63.753(d)(1)(vii), (d)(2)]: Report **semiannually**: ❖ The periods where a nonchemical depainting operation was not immediately shut down when the pressure drop, water flow rate or recommended parameter(s) was outside acceptable limits Report **annually**: ❖ Description of any control device currently used that was not listed in the notification of compliance status or any subsequent report ❖ The number of times the pressure drop for each filter system exceeds acceptable limits ❖ The number of times the water flow rate or recommended booth parameters if using a pumpless system for each waterwash system exceeds acceptable limits **<u>If Option 3 is used</u>**, report the following [63.753(d)(1)(i)-(iv)]: Report **semiannually** [63.753(d)(1)(i)-(iv)]: ❖ Any 24-hour period where organic HAP were emitted from the depainting of an aerospace vehicle (other than when a control device was used)	40 CFR 63.753(d)(1)(vi) For periods of malfunctions: 40 CFR 63.753(d)(1)(vi)(A) The non-chemical method or technique that malfunctioned; 40 CFR 63.753(d)(1)(vi)(B) The date that the malfunction occurred; 40 CFR 63.753(d)(1)(vi)(C) A description of the malfunction; 40 CFR 63.753(d)(1)(vi)(D) The methods used to depaint aerospace vehicles during the malfunction period; 40 CFR 63.753(d)(1)(vi)(E) The dates that these methods were begun and discontinued; and 40 CFR 63.753(d)(1)(vi)(F) The date that the malfunction was corrected; 40 CFR 63.753(d)(1)(vii) All periods where a nonchemical depainting operation subject to §63.746(b)(2) and (b)(4) for the control of inorganic HAP emissions was not immediately shut down when the pressure drop, water flow rate, or recommended booth parameter(s) was outside the limit(s) specified by the filter or booth manufacturer or in locally prepared operational procedures; 40 CFR 63.753(d)(2) Annual reports occurring every 12 months from the date of the notification of compliance status that identify: 40 CFR 63.753(d)(3)(iii) Descriptions of any control devices currently in use that were not listed in the notification of compliance status or any subsequent report. 40 CFR 63.753(d)(2)(ii) The number of times the pressure drop limit(s) for each filter system or the number of times the water flow rate limit(s) for each waterwash system were outside the limit(s) specified by the filter or booth manufacturer or in locally prepared operating procedures. 40 CFR 63.753(d)(1) Semiannual reports occurring every 6 months from the date of the notification of compliance status that identify: 40 CFR 63.753(d)(1)(i) Any 24-hour period where organic HAP were emitted from the depainting of aerospace vehicles, other than from the exempt operations listed in §63.746(a), (b)(3), and (b)(5).	*rule, but to do so, you must submit information about the system you wish to use no later than 120 days prior to the compliance date. See 63.743(c) for additional information.* ❖ Use a control system to reduce organic HAP emissions <u>by 81% for existing sources and 95% for new sources</u> from baseline established from 1996 and 1997, on a usage per aircraft or usage per ft2 of surface basis ➢ Control system options include carbon adsorption or noncarbon adsorption ➢ Overall efficiency is the product of capture and destruction or removal efficiency, and may take into account the volume of chemical stripper used relative to the baseline. Capture and destruction efficiency is determined by following 63.750(g) if your control device is a carbon adsorber, or 63.750(h) whenever a control device other than a carbon adsorber is used ➢ Perform initial performance test unless a waiver is obtained [63.749(d)(2)] **<u>Spot Stripping and Decal Removal (in addition to Option 1, 2, or 3)</u>** [63.746(b)(3)]: ❖ On an annual average basis, use no more than 26 gallons of organic HAP-containing chemical strippers or alternatively 190 pounds of organic HAP per commercial aircraft depainted ❖ On an annual average basis, use no more than 50 gallons of organic HAP-containing chemical strippers or alternatively 365 pounds of organic HAP per military aircraft depainted.

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Reporting Requirements as Stated in EPA Implementation Guide EPA 456/R-97-006 January 2001 Update	**Reporting Requirements as Stated in Aerospace NESHAP 40 CFR 63 Subpart GG**	**Compliance Options Referenced in the Reporting Requirements as Stated in EPA 456/R-97-006 January 2001 Update**
Depainting Operations		
❖ Any new chemical stripper used at the facility during the reporting period ❖ The organic HAP content of these new chemical strippers ❖ The organic HAP content of each chemical stripper that undergoes reformulation. Also report **semiannually** [63.753(d)(3)]: ❖ Description of any control device currently used that was not listed in the notification of compliance status or any subsequent report ❖ If carbon adsorber is used: ➢ Each rolling period when the overall control efficiency is calculated to be less than 81% for existing systems and 95% for new systems, the initial material balance calculation, and any exceedances as demonstrated through the calculation ❖ If nonregenerative carbon adsorbers are used: ➢ Submit design evaluation, the continuous monitoring system performance report, and any excess emissions as demonstrated through deviations in monitoring values ❖ If other control devices are used: ➢ Each exceedance of the operating parameters established for the control device under the initial performance tests	40 CFR 63.753(d)(1)(ii) Any new chemical strippers used at the facility during the reporting period; 40 CFR 63.753(d)(1)(iii) The organic HAP content of these new chemical strippers; 40 CFR 63.753(d)(1)(iv) For each chemical stripper that undergoes reformulation, its organic HAP content; 40 CFR 63.753(d)(3) Where a control device is used to control organic HAP emissions, semiannual reports that identify: 40 CFR 63.753(d)(3)(iii) Descriptions of any control devices currently in use that were not listed in the notification of compliance status or any subsequent report. 40 CFR 63.753(d)(3)(i) If a carbon adsorber is used, 40 CFR 63.753(d)(3)(i)(A) each rolling period when the overall control efficiency of the control system is calculated to be less than 81% for existing systems or less than 95% for new systems, the initial material balance calculation, and any exceedances as demonstrated through the calculation; or, 40 CFR 63.753(d)(3)(i)(B) for nonregenerative carbon adsorbers, submit the design evaluation, the continuous monitoring system performance report, and any excess emissions as demonstrated through deviations of monitored values. 40 CFR 63.753(d)(3)(ii) For control devices other than a carbon adsorber, each exceedance of the operating parameter(s) established for the control device under the initial performance test during which compliance was demonstrated;	

Summary of Reporting Requirements in the Aerospace NESHAP (40 CFR 63 Subpart GG)

Reporting Requirements as Stated in EPA Implementation Guide EPA 456/R-97-006 January 2001 Update	Reporting Requirements as Stated in Aerospace NESHAP 40 CFR 63 Subpart GG	Compliance Options Referenced in the Reporting Requirements as Stated in EPA 456/R-97-006 January 2001 Update
Chemical Milling Maskant Operations		
All Options, report the following [63.753(e)]: ❖ Semiannual reports occurring every 6 months (from the date of notification of compliance status) which identify required reporting for each category. If the operations have been in compliance for the semiannual period, a statement that the operations have been in compliance with the applicable standards	40 CFR 63.753(e) Chemical milling maskant application operation. Each owner or operator of a chemical milling maskant application operation subject to this subpart shall submit semiannual reports occurring every 6 months from the date of the notification of compliance status that identify: 40 CFR 63.753(e)(6) If the operations have been in compliance for the semiannual period, a statement that the chemical milling maskant application operation has been in compliance with the applicable standards.	**All Options:** Handle and transfer materials in a manner that minimizes spills [63.747(b)]. **Option 1**: Uncontrolled, compliant maskants. Use compliant maskants that comply with the limits below (not shown [63.747(c)(1), (2)]:
❖ All chemical milling maskants currently used that were not listed in the notification of compliance status or any other subsequent semiannual report	40 CFR 63.753(e)(4) All chemical milling maskants currently in use that were not listed in the notification of compliance status or any other subsequent semiannual report;	**Option 2:** Uncontrolled, averaged maskants. Average maskants a manner that meets all of the following criteria [63.747(e)(2). 63.743(d)]: ❖ Use any combination of uncontrolled maskants such that the monthly volume-weighted average of organic HAP and VOC content of the combination of maskants complies with the content limits in 63.747(c), which is the same as Option 1. Only uncontrolled maskants can use this option. The permitting agency can specify a shorter averaging period than monthly [63.743(d)]
If Option 1 is used, report the following: ❖ When nonaveraging methods are used [63.753(e)(1)]: ➢ Each value of H_i and G_i that exceeds the applicable organic HAP or VOC content limit.	40 CFR 63.753(e)(1) For chemical milling maskants where compliance is not being achieved through the use of averaging or a control device, each value of Hi and Gi, as recorded under §63.752(f)(1)(i), that exceeds the applicable organic HAP or VOC content limit specified in §63.747(c);	❖ Averaging Type I and Type II maskants together is not allowed ❖ Averaging schemes must be pre-approved by the permitting authority as adopted as part of your title V operating permit
If Option 2 is used, report the following: ❖ When averaging methods are used [63.753(e)(2)]: ➢ Each value of H_a and G_a that exceeds the applicable organic HAP or VOC content limit.	40 CFR 63.753(e)(2) For chemical milling maskants where compliance is being achieved through the use of averaging, each value of Ha and Ga, as recorded under §63.752(f)(2)(i), that exceeds the applicable organic HAP or VOC content limit specified in §63.747(c);	**Option 3:** Controlled Maskants. Use add-on controls that meet all of the following criteria [63.747(d)]: *Note: You may use air pollution control devices not listed in the rule, but to do so, you must submit information about the system you wish to use no later than 120 days prior to the compliance date. See 63.743(c) for additional information.*
If **Option 3 is used,** report the following [63.753(e)(5)]: ❖ Description of any control devices currently in use that were not listed in the notification of compliance status or any subsequent reports	40 CFR 63.753(e)(5) Descriptions of any control devices currently in use that were not listed in the notification of compliance status or any subsequent report; and	❖ Demonstrate an overall removal efficiency (of both organic HAP and VOC) of 81%. Overall removal efficiency is the product of the capture efficiency and the destruction efficiency
❖ Control device is incineration [63.753(e)(3)(i)]: ➢ All periods when the 3-hour average combustion temperature is less than the average combustion temperature established during the most recent performance test demonstrating compliance	40 CFR 63.753(e)(3) Where a control device is used, 40 CFR 63.753(e)(3)(i) If incinerators are used to comply with the standards, all periods when the 3-hour average combustion temperature(s) is (are) less than the average combustion temperature(s) established under §63.751(b)(11) or (12) during the most recent performance test during which compliance was demonstrated;	❖ Operate in a manner that minimizes spills [63.747(b)] ❖ Perform initial performance testing unless a waiver is obtained [63.749(d)(2)]
❖ Control device is a carbon adsorber [63.753(e)(3)(ii)(A)]: ➢ Each rolling period when the overall control efficiency of the control system is less than 81%, the initial material balance calculation, and any exceedance as demonstrated through calculations	40 CFR 63.753(e)(3)(ii) If a carbon adsorber is used, 40 CFR 63.753(e)(3)(ii)(A) each rolling period when the overall control efficiency of the control system is calculated to be less than 81%, the initial material balance calculation, and any exceedances as demonstrated through the calculation; or,	**Option 4:** Waterborne Maskants. Use waterborne maskants that meet all of the following criteria [63.741(i)]: *Note: Waterborne coatings are exempted from the following sections of the rule if they meet the organic HAP and VOC content limits in 63.747(c): 63.747(d) [control devices], 64.747(e) [compliant maskants], 63.749(h) [performance tests], 63.750(k)-(n) [HAP and VOC content determination], 63.752(f)*

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Chemical Milling Maskant Operations		
❖ Control device is a <u>nonregenerative carbon adsorber</u> [63.753(e)(3)(ii)(B)]: ➢ Submit the design evaluation, the continuous monitoring system performance report, and any excess emissions as demonstrated through deviations of monitored values ❖ Control device is something <u>other than an incinerator or carbon adsorber [63.753(e)(3)(iii)]</u>: ➢ Each exceedance of the operating parameters established for the control device under the initial performance test during which compliance was demonstrated **<u>If Option 4 is used</u>**, no reporting is required.	40 CFR 63.753(e)(3)(ii)(B) for nonregenerative carbon adsorbers, submit the design evaluation, the continuous monitoring system performance report, and any excess emissions as demonstrated through deviations of monitored values. 40 CFR 63.753(e)(3)(iii) For control devices other than an incinerator or carbon adsorber, each exceedance of the operating parameter(s) established for the control device under the initial performance test during which compliance was demonstrated;	*[organic HAP and VOC recordkeeping], and 63.753(e) [primer and topcoat reporting].* ❖ Maintain manufacturer's data and annual purchase records for 5 years ❖ Waterborne coatings may be averaged under 63.743(d)