

## Miscellaneous Metal Parts and Products Coating RACT

January 2017

The miscellaneous metal parts coatings RACT (reasonably available control technology) rule applies throughout the state to facilities that coat metal parts or products described by the Standard Industrial Classification Code (SIC) groups 33 through 39. These SIC codes include, but are not limited to, such groups as metal fabricators, machine tool manufacturers, electrical apparatus manufacturers, and truck trailer manufacturers. The actual regulation can be found in section NR 422.15 of the Wisconsin Administrative Code.

### Does this Rule Apply to My Business?

Several exemptions to the Miscellaneous Metal Parts and Products Coating RACT exist. If you are unsure whether your facility qualifies for an exemption, contact your DNR regional office or the Small Business Environmental Assistance Program (see information at the end of this fact sheet).

Processes exempt from this rule include:

- coating airplane exteriors
- coating marine vessels
- autobody refinishing
- customized top coating of cars and trucks if production is less than 35 vehicles per day
- coating operations subject to other RACT rules in ch. NR 422

Also,

- businesses **not** in the counties of Door, Kenosha, Kewaunee, Manitowoc, Milwaukee, Ozaukee, Racine, Sheboygan, Walworth, Washington and Waukesha have exemptions for adhesive applications, sealants used to seal or fill holes or seams, silk screening of metal parts, and emergency vehicle manufacturing (subject to s. NR 422.155, Wis. Adm. Code)
- facilities in all counties that **never** emit more than 15 pounds of VOCs per day from all miscellaneous metal parts and products coating line(s), without use of emission control equipment
- facilities located **in** the counties of Brown, Calumet, Dane, Dodge, Fond du Lac, Jefferson, Outagamie, Rock or Winnebago that have actual emissions of less than 10 tons of VOCs per year (about 1,666 lbs per month) from all miscellaneous metal parts & products coating line(s), without use of emission control equipment
- facilities located **outside** the counties of Brown, Calumet, Dane, Dodge, Door, Fond du Lac, Jefferson, Kenosha, Kewaunee, Manitowoc, Milwaukee, Outagamie, Ozaukee, Racine, Rock, Sheboygan, Walworth, Washington, Waukesha, and Winnebago that emit less than 100 tons of VOCs per year from their entire facility, calculated without the use of any emission control equipment.

If your facility is eligible for one of these exemptions, you must keep adequate records to document that you are exempt. Records could include invoices, purchase records, or inventory records. Records must include all appropriate information to support your exemption.

### How Does My Business Comply with this Rule?

If your facility is subject to this rule, you must meet the VOC emission limits in Table 1. These limits are expressed in pounds of VOC per gallon of coating, less water, as applied.

## Compliance Options

The following actions may help businesses comply with the rule:

- Switch to high-solids or water-based coating technology, with a VOC content lower than the applicable limit on an as applied basis.
- Implement in-line averaging, so that the daily average VOC content of coatings used on a single coating line is less than the applicable VOC content limit (low VOC coatings offset high VOC coatings). If you plan to use emission averaging, compliance must be demonstrated using equations and methods specified in s. NR 422.03, Wis. Adm. Code.
- Install emission control equipment, such as an coatings offset high VOC coatings). If you plan to use emission averaging, compliance must be demonstrated using equations and methods specified in s. NR 422.03, Wis. Adm. Code.

Table 1: VOC Emissions Limits				
Coating Type	VOC Content Limit			
	Cured	Air Dry	Prime	Pretreatment
Clear Coating	4.3	4.3		
Extreme Performance	3.5			
High Performance Architectural**	5.6	5.8	5.4	
All other Coatings	3	3.5		
Pretreatment*				6.5
* Pretreatment limits only apply to businesses located outside the counties of Door, Kenosha, Kewaunee, Manitowoc, Milwaukee, Ozaukee, Racine, Sheboygan, Walworth, Washington and Waukesha.				
** Architectural limits only apply to businesses that were involved in the application of high performance architectural coatings prior to July 1, 1983 and are located outside the counties of Brown, Calumet, Dane, Dodge, Door, Fond du Lac, Jefferson, Kenosha, Kewaunee, Manitowoc, Milwaukee, Outagamie, Ozaukee, Racine, Rock, Sheboygan, Walworth, Washington, Waukesha and Winnebago.				

## Additional Assistance

For more information, contact SBEAP staff at 855-889-3021 or [DNRSmallBusiness@wisconsin.gov](mailto:DNRSmallBusiness@wisconsin.gov) or visit their web page (<http://dnr.wi.gov/topic/SmallBusiness/>). Contact information for Air Management Program staff can be found at: <http://dnr.wi.gov/topic/AirQuality/Contacts.html>.

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Wisconsin Department of Natural Resources  
 Bureau of Air Management  
 Box 7921- AM/7  
 Madison, WI 53707  
 PHONE 608-266-7718 • FAX 608-267-0560  
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