

### **Checklist: Application Equipment Requirement<sup>1</sup>**

- \_\_\_ The facility does not use conventional air spray guns.
  
- \_\_\_ The facility operates conventional air spray guns, but are only used:
  1. If they are using the guns to apply coatings that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;
  2. If they are using the gun for touchup and repair that occurs either after the completion of the finishing operation or after the application of stain and before the application of other types of finishing materials. In addition, any materials used for touch up and repair after the stain application must be applied from a container with a volume of no more than 2.0 gallons.
  3. If the guns are automatic;
  4. If the guns are used in a spray booth or other application station where emission are directed to a control device;
  5. If the guns are only used for applying small quantities of finishing materials. The total amount of finishing material applied with the conventional air spray gun must be no more than 5.0 percent of the total amount of finishing material used in that semiannual period; or
  6. If the gun is used to apply stain and the facility has demonstrated that it is technically or economically infeasible to use another spray application technology.

#### *Operator Training Program*

- \_\_\_ The facility has developed an operator training program that contains:
  - ! A list of job descriptions and current personnel that must be trained;
  - ! An outline of the subjects to be covered for each job description;
  - ! An initial and refresher training program; and
  - ! A description how the facility will document personnel's successful completion of the program.

#### *Inspection and Maintenance Plan*

- \_\_\_ The facility has developed an inspection and maintenance plan that:
  - ! Addresses equipment leaks;
  - ! Includes a monthly visual inspection to ensure there are no equipment leaks of all equipment used to transfer or apply finishing materials or organic solvents;
  - ! Specifies how a facility will document date, result, and repairs of an inspection; and
  - ! Assures first attempt at leak repair within 5 days and final repair within 15 days, unless repair requires replacement of the equipment in which case the facility is allowed 3 months to complete repairs.

#### *Cleaning and Washoff Solvent Accounting Program*

- \_\_\_ The facility has developed a program that tracks:
  - ! the amount of organic solvent used for cleaning and washoff each month;
  - ! the quantity of spent solvent generated from each cleaning or washoff operation each month;
  - ! the amount of spent solvent that is reused or disposed; and
  - ! the number of pieces washed off and the reason for the washoff.

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<sup>1</sup> Wood Furniture Manufacturing Operations NESHAP Implementation Document, United States Environmental Protection Agency, Office of Air Quality Planning and Standards, EPA-456/R-97-005, September 1997, <http://www.epa.gov/ttn/uatw>

*Cleaning and Washoff Solvent Composition*

- The facility has discontinued the use of solvents that contains known or probable human carcinogens. (See Appendix F for list of solvents)