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DARM-PER-23

SUBJECT: Guidance on Manufacturing vs. Refinishing Regarding the RACT Rule of Surface Coating of Miscellaneous Metal Parts

DATE: March 1, 2000

This memo provides guidance on Rule 62-296.513, F.A.C., Surface Coating of Miscellaneous Metal Parts and Products.

The Control Techniques Guidance (CTG) for this category was published by the U.S. Environmental Protection Agency in June 1978. The document deals with the surface coating of miscellaneous metal part and products, and is intended to provide guidance on VOC emission control for job shop and original equipment manufacturing that apply coatings on metal substrates.

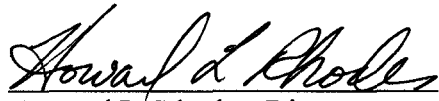
This is a broad industrial category. This miscellaneous metal part and product category includes hundreds of small-to-medium size industries for which writing individual guideline documents would be impractical. There are far more dissimilarities than similarities between both the many plants and various industries represented by this category. Some industries, such as large farm machinery, are located primarily in agricultural areas of the country. Others, like small appliances, may be scattered throughout the country although greater numbers of small appliance manufacturers may be located near large population centers. Within the industries, large variations in manufacturing techniques and procedures exist. Some facilities manufacture and coat metal parts, then assemble them to form a final product to be sold directly to retail. Others, often called job shops, manufacture and coat products under contract. The metal parts are shipped to the final product manufacturer to be assembled with other parts into a product.

The above discussion, taken from the CTG for miscellaneous metal parts, refers only to manufacturing – not refinishing. Secondly, the CTG specifically excludes automobile refinishing because of the large number of small sources involved; the fact that the operations are different than those generally addressed in the CTG and model rule; and, the difficulty in controlling small sources.

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As a result, all miscellaneous metal parts refinishing operations are not applicable to the provisions of Rule 62-296.513, F.A.C.

A handwritten signature in black ink, appearing to read "Howard L. Rhodes". The signature is written in a cursive style with a horizontal line underneath.

Howard L. Rhodes, Director
Division of Air Resources Management