

GENERAL
AIR CONTAMINANT DISCHARGE PERMIT
ATTACHMENT

Department of Environmental Quality
 Air Quality Division
 811 SW Sixth Avenue
 Portland, OR 97204-1390
 Telephone: (503) 229-5359

This attachment is issued in accordance with the provisions of ORS 468A.040 and OAR 340-216-0060

ISSUED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY

Signed copy on file at DEQ Headquarters Office

 Andy Ginsburg, Air Quality Division Administrator

 Dated

Table 1 Code	Source Description	NAICS
Part B, 59	Spray coating of motor vehicles, mobile equipment, or metal and/or plastic parts or products subject to 40 CFR part 63 subpart HHHHHH, as adopted under OAR 340-244-0220	211112, 311942, 321991, 322214, 325110, 325120, 325131, 325188, 325192, 325193, 325199, 325211, 325510, 325998, 326199, 32614, 32615, 326199, 326291, 326299, 331111, 33121, 331221, 331311, 331316, 331511, 331513, 331524, 332311, 332312, 332321, 332323, 33242, 332722, 332813, 332991, 33312, 333313, 333611, 334119, 33422, 336111, 336112, 33612, 336211, 336212, 336213, 336214, 336312, 33632, 33633, 33634, 33635, 33637, 336399, 336413, 336414, 336415, 33651, 336611, 336612, 3369, 336991, 336999, 337214, 339111, 339112, 33992, 33995, 339999, 441110, 441120, 482111, 54171, 56121, 56211, 562211, 562212, 562213, 562219, 562920, 713931, 8111, 811121, 81131, 811420

TABLE OF CONTENTS

1.0 ATTACHMENT ASSIGNMENT3
2.0 COATING OPERATIONS AND MAINTENANCE.....4
3.0 TRAINING REQUIREMENTS5
4.0 PAINT STRIPPING OPERATIONS.....7
5.0 COMPLIANCE DEMONSTRATION7
6.0 RECORDKEEPING REQUIREMENTS8
7.0 REPORTING REQUIREMENTS10
8.0 ADMINISTRATIVE REQUIREMENTS11
9.0 FEES11
10.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS12

1.0 ATTACHMENT ASSIGNMENT

- 1.1. Qualifications** The permittee must be performing spray coating and/or paint removal activities listed on the cover page of this permit, including supporting activities, in order to qualify for assignment to this General Air Contaminant Discharge Permit (ACDP) Attachment.
- 1.2. Exclusions** This attachment is not applicable to the following surface coating or paint removal activities:
- a. Surface coating or paint stripping performed on site at installations owned or operated by the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State), the National Aeronautics and Space Administration, or the National Nuclear Security Administration.
 - b. Surface coating or paint stripping of military munitions, as defined in 40 CFR 63.11180, manufactured by or for the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State) or equipment directly and exclusively used for the purposes of transporting military munitions.
 - c. Surface coating or paint stripping performed by individuals on their personal possessions or property, either as a hobby or for maintenance of their personal possessions or property and performed by individuals for others without compensation. An individual who spray applies surface coating to more than two motor vehicles or pieces of mobile equipment per year is subject to the requirements in this permit that pertain to motor vehicle and mobile equipment surface coating regardless of whether compensation is received.
 - d. Surface coating or paint stripping meeting the definition of “research and laboratory activities” in 40 CFR 63.1180.
 - e. Surface coating or paint stripping meeting the definition “quality control activities” in 40 CFR 63.1180.
 - f. Surface coating or paint stripping activities covered under another area source NESHAP.
- 1.3. Assignment** DEQ will assign qualifying permittees to this attachment that have and maintain a good record of compliance with DEQ’s Air Quality regulations and that DEQ determines would be appropriately regulated by a General ACDP. DEQ may rescind assignment if the permittee no longer meets the requirements of this attachment.

- 1.4. Permitted Activities** The permittee is allowed to discharge air contaminants from processes and activities related to the air contaminant source(s) listed on the first page of this attachment until the attachment expires, is modified, revoked or rescinded as long as conditions of this attachment are complied with. If there are other emissions activities occurring at the site besides those listed on the cover page of this attachment, the permittee may be required to obtain a Simple or Standard ACDP or an additional General ACDP Attachment(s), if applicable.

2.0 COATING OPERATIONS AND MAINTENANCE

- 2.1. Compliance date** An existing affected source must achieve compliance no later than January 10, 2011. A new affected source must achieve compliance no later than January 9, 2008 or upon initial startup, whichever is later.
- 2.2. Spray application** The spray application of surface coatings is prohibited by persons who are not certified, by the deadlines in Condition 3.2, to have completed the training described in Condition 3.1. This does not apply to the students of an accredited surface coating training program who are under the direct supervision of an instructor.
- 2.3. Spray booth or enclosure** All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the following requirements:
- a. All spray booths, preparation stations, or mobile enclosures must be fitted with filters demonstrated to achieve at least 98% capture of paint overspray. Filter efficiency must be demonstrated in accordance with ASHRAE Method 52.1 and 40 CFR 63.11172(e)(2)(i). Published filter efficiency data provided by filter vendors may be used, provided the filter efficiency was determined using ASHRAE Method 52.1 and 40 CFR 63.11172(e)(2)(i). This requirement does not apply to waterwash spray booths that are operated and maintained according to the manufacturer's specifications.
 - b. All spray booths and preparation stations must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of a booth may have openings, if needed, to allow for conveyors and parts to pass through the booth during the coating process.
 - c. Mobile ventilated enclosures that are used to perform spot repairs must enclose and, if necessary, seal against the surface around the area being coated such that paint overspray is retained within the enclosure and directed to a filter to capture paint overspray.

- 2.4. Spray equipment** All spray-applied coatings must be applied as follows:
- a. With a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, or air-assisted airless spray gun.
 - b. With an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed in Condition 2.4.a for a comparable operation, and for which written approval has been obtained from the U.S. EPA Administrator.
 - c. The spray-equipment requirement does not apply to the following:
 - i. Surface coating of aerospace vehicles that involves the coating of components that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces;
 - ii. To the application of coatings on aerospace vehicles that contain fillers that adversely affect atomization with HVLP spray guns;
 - iii. To the application of coatings on aerospace vehicles that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.).

- 2.5. Spray Gun Cleaning** All paint spray gun cleaning must be done as follows:
- a. Cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent.
 - b. Examples of acceptable spray gun cleaning methods include: hand cleaning of the disassembled gun in a container of solvent; flushing solvent through the gun without atomizing the solvent and paint residue; or using a fully enclosed spray gun washer.
 - c. A combination of non-atomized methods may also be used.

3.0 TRAINING REQUIREMENTS

- 3.1. Operator Training** The permittee must ensure and certify that all personnel, including contract personnel, who spray apply surface coatings, are trained in the proper spray application of surface coatings and proper setup and maintenance of spray equipment by the deadlines in Condition 3.2. The training requirement does not apply to the students of an accredited surface coating training program who are under the direct supervision of an instructor. The training program must include, at a minimum, the following:

- a. A list of all current personnel by name and job description who are required to be trained;
- b. Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the following topics:
 - i. Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.
 - ii. Spray techniques for different types of coatings to improve transfer efficiency and minimize coating usage; the correct spray gun distance and angle to the part; using proper banding and overlap; and reducing lead and lag spraying at the beginning and ending of each stroke.
 - iii. Routine spray booth and filter maintenance, including filter selection and installation.
 - iv. Environmental compliance with the requirements of this permit.
- c. A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training.

3.2. Operator Training Deadlines

All new and existing personnel who spray apply surface coatings, as defined in 40 CFR 63.11180, must be trained by the following dates. Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire.

- a. For an existing source (in existence prior to September 17, 2007), training and certification must be completed by January 10, 2011 or no later than 180 days after hiring, whichever is later.
- b. For a new source, all personnel must be trained and certified no later than July, 7, 2008 or no later than 180 days after hiring, whichever is later.
- c. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in Condition 3.1.b, satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.
- d. If it can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in Condition 3.1.b, the permittee is not required to provide the initial training to these painters.

- 3.3. Refresher Training** Training and certification will be valid for a period not to exceed five years after the date training is completed. The permittee must ensure that all personnel receive refresher training and be certified every five years in accordance with requirements in Condition 3.1.

4.0 PAINT STRIPPING OPERATIONS

- 4.1. Applicability** This section applies only to facilities that use methylene chloride (MeCl) to remove dried coatings from any surface.
- 4.2. Management Practices** The permittee must implement management practices to minimize evaporative emissions of MeCl. The management practices must address, at a minimum, the following practices, as applicable:
- Evaluate each application to ensure there is a need for paint stripping (e.g., evaluate whether it is possible to re-coat the piece without removing the existing coating).
 - Evaluate each application to ensure that there is no alternative paint stripping technology that can be used.
 - Reduce exposure of all paint strippers to the air.
 - Optimize application conditions (e.g., if the stripper must be heated, make sure that the temperature is kept as low as possible to reduce evaporation).
 - Practice proper storage and disposal of paint strippers (e.g., store stripper in closed, air-tight containers).
- 4.3. Minimization Plan** For each paint stripping operation that uses more than one ton of MeCl per year, the permittee must develop and implement a written MeCl minimization plan. At a minimum, the plan must address each item in Condition 4.2, as applicable, to the operation. The plan must be kept on site and be made available upon request.
- 4.4. Signage** For each paint stripping operation that uses more than one ton of MeCl per year, the permittee must post a sign or placard outlining the minimization plan in each area where paint stripping operations occur.

5.0 COMPLIANCE DEMONSTRATION

- 5.1. Plant Site Emission Limits (PSEL)** Plant site emissions must not exceed the following. These PSELs are not in addition to the PSELs in the source's General ACDP and other General ACDP Attachments.

Pollutant	Limit	Units
VOC	39	tons per year
Single HAP	9	tons per year
Combined HAPs	24	tons per year

- 5.2. Annual Period** The annual plant site emissions limits apply to any 12-consecutive calendar month period.
- 5.3. VOC and HAP PSEL Compliance Monitoring for Surface Coating Operations PSEL Compliance Monitoring** Compliance with the VOC and HAP PSELs is determined for each 12-consecutive calendar month period based on material throughput for the reporting period.
- a. Facilities will be presumed to be in compliance with the yearly VOC or HAP PSEL provided:
 - i. There are no other operations covered in the source's General ACDP and any other General ACDP Attachments that emit VOC or HAP; and
 - ii. Total VOC or HAP containing coating and solvent consumption does not exceed 2,500 gallons during any 12-consecutive calendar month period.
 - b. If there are other operations covered in the source's General ACDP and any other General ACDP Attachments that emit VOC or HAP or the permittee exceeds the total VOC or HAP containing coating and solvent consumption stated above, the permittee must demonstrate compliance with the yearly VOC or HAP PSEL on a monthly basis as follows:

$$E_{\text{VOC or HAP}} = [\sum(C_X * K_X)] \times 1 \text{ ton}/2000 \text{ lb}$$

where,

E_{VOC} = VOC or HAP emissions (tons/yr);

C = Material usage for the period in gallons;

K = VOC or HAP content of the material (lb/lb);

X = Subscript X represents a specific material.

6.0 RECORDKEEPING REQUIREMENTS

- 6.1. General** The permittee must maintain the following records:
- a. All notifications and reports submitted to DEQ in accordance with this permit.
 - b. Records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report.
 - c. Records of any deviation from the requirements in this permit. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation.

6.2. Coating Operations

The permittee must maintain the following records related to surface coating operations:

- a. Certification that each painter has completed the training specified in Condition 3.1 with the date the initial training and the most recent refresher training was completed.
- b. Documentation of the filter efficiency of any spray booth exhaust filter material as specified in Condition 2.3.
- c. Dates the filters used to comply with Condition 2.3 were replaced. This may be part of the daily log.
- d. Documentation from the spray gun manufacturer that each spray gun with a cup capacity equal or greater than 3.0 fluid ounces (89 cc) that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined by EPA to achieve a transfer efficiency equivalent to that of an HVLP spray gun, in accordance with Condition 2.4.

6.3. Stripping Operations

The permittee must maintain the following records related to paint stripping:

- a. Information about each MeCl containing paint stripper used at the facility, including the MeCl content of the stripper and the amount of the stripper used per month and year, in gallons.
- b. MSDS, documentation provided by the supplier or manufacturer, or engineering calculations are sufficient to document the paint stripper MeCl content.
- c. Purchase receipts or itemized invoices are sufficient to document paint stripper usage.
- d. For a paint stripping operation that annually uses more than one ton of MeCl, the permittee is required to maintain a record of the current MeCl minimization plan on site for the duration of the paint stripping operations. The permittee must also keep records of the annual review of, and updates to, the MeCl minimization plan.

6.4. Emissions

The permittee must maintain records of annual emissions and/or annual coating and solvent usage, as applicable (see Condition 5.3), including the VOC and HAP content of each coating and solvent used.

7.0 REPORTING REQUIREMENTS

- 7.1. Initial Notification** The permittee must submit an initial notification in accordance with 40 CFR 63.11175(a). A form for this purpose is available from DEQ. The notification must be sent to the appropriate DEQ office, as listed in the permittee's General ACDP.
- a. For painting/stripping operations existing on July 7, 2008, this notification must be submitted no later than January 11, 2010.
 - b. For sources constructed/installed after July 7, 2008, this notification must be submitted within 180 days of initial start-up of the painting operation.
- 7.2. Notification of Compliance Status** The permittee must submit a notification of compliance status in accordance with 40 CFR 63.11175(b). A form for this purpose is available from DEQ. The notification must be sent to the appropriate DEQ office, as listed in the permittee's General ACDP.
- a. For painting/stripping operations existing on July 7, 2008, this notification must be submitted not later than March 11, 2011.
 - b. For sources constructed/installed after July 7, 2008, this notification must be submitted within 180 days of initial start-up of the painting operation.
 - c. For a paint stripping operation for which a written MeCl minimization plan has not been developed in accordance with Condition 4.3, the permittee must submit a new notification of compliance status by March 1 of the year following a year in which more than one ton of MeCl is used.
- 7.3. Annual Report** For each year this permit is in effect, the permittee must submit to DEQ by **February 15** two (2) copies of the following information for the previous calendar year:
- a. The company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.
 - b. The name, title, address, telephone, e-mail address (if available) and signature of the certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this permit or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance.
 - c. For each spray-applied coating that contains a metal HAP, the metal HAP content and amount used, in gallons.

- d. For each paint stripper used that contains MeCl, the MeCl content and amount used, in gallons.
- e. Summary of complaints relating to air quality received by permittee during the year.
- f. Annual VOC and HAP containing coating and solvent usage or annual emissions, as applicable (see Condition 5.3).

8.0 ADMINISTRATIVE REQUIREMENTS

8.1 Reattachment

A complete application for reattachment is due within 60 days after this attachment is reissued. DEQ will notify the permittee when the attachment is reissued. The application must be sent to the appropriate regional office.

- a. If DEQ is delinquent in renewing the attachment, the existing attachment will remain in effect and the permittee must comply with the conditions of the attachment until such time that the attachment is reissued and reattached to the permit.
- b. The permittee may submit an application for either a Simple or Standard ACDP at any time, but the permittee must continue to comply with the attachment until DEQ takes final action on the Simple or Standard ACDP application.
- c. If a complete application for reattachment or Simple or Standard ACDP is filed with DEQ in a timely manner, the attachment will not be deemed to expire until final action has been taken on the application.

9.0 FEES

9.1 Annual Compliance Fee

The Annual Compliance Determination Fee for a General ACDP attachment is due on **December 1** of each year this attachment is in effect. An invoice indicating the amount, as determined by DEQ regulations, will be mailed prior to the above date.

10.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

ACDP	Air Contaminant Discharge Permit	metal HAP	chromium, manganese, lead, nickel, cadmium
ASHRAE	American Society of Heating, Refrigerating, and Air-Conditioning Engineers	MSDS	material safety data sheet
AQMA	Air Quality Maintenance Area	NESHAP	National Emissions Standards for Hazardous Air Pollutants
calendar year	The 12-month period beginning January 1st and ending December 31st	OAR	Oregon Administrative Rules
CFR	Code of Federal Regulations	ORS	Oregon Revised Statutes
DEQ	Oregon Department of Environmental Quality	Pb	Lead
EPA	US Environmental Protection Agency	PSEL	plant site emission limits
HAP	Hazardous Air Pollutant as defined by OAR 340-244-0040	SIC	Standard Industrial Code
MeCl	Methylene chloride	Special Control Area	as defined in OAR 340-204-0070
		VOC	volatile organic compounds
		year	A period consisting of any 12-consecutive calendar months

jce: 03/28/2011
 AQGP-027a surface coating and paint stripping.docx