

Department of Environmental Quality
Air Quality Program

GENERAL
AIR CONTAMINANT DISCHARGE PERMIT
ASSESSMENT REPORT

SURFACE COATING AND PAINT STRIPPING

SOURCE DESCRIPTION AND QUALIFICATION

1. This general permit is designed to regulate air contaminant emissions from the spray application of coatings to motor vehicles, mobile equipment, and parts or products made of metal or plastic or combinations of metal and plastic, subject to the Paint Stripping and Miscellaneous Surface Coating Operations NESHAP (40 C.F.R. part 63 subpart HHHHHH). This general permit is also designed to regulate air contaminant emissions from paint stripping activities that utilize methylene chloride. NESHAP HHHHHH regulates the following operations:
 - a. Paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl) for the removal of dried paint (including, but not limited to, paint, enamel, varnish, shellac, and lacquer) from wood, metal, plastic, and other substrates;
 - b. Autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations;
 - c. Spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.

2. This General Permit does not apply to activities that are included in the exemptions from NESHAP HHHHHH as follows:
 - a. Motor vehicle or mobile equipment surface coating operations that receive an exemption from 40 C.F.R. part 63 subpart HHHHHH because they do not spray apply coatings that contain target HAP (compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd)).
 - b. Spray coating applications that meet the definition of facility maintenance or space vehicle in 40 C.F.R. §63.11180.
 - c. 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.
 - d. 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.
- e. 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. This general permit also does not apply when these operations are performed by individuals for others without compensation.
 - f. Surface coating or paint stripping that meets the definition of “research and laboratory activities” in 40 C.F.R. §63.11180.
 - g. Surface coating or paint stripping that meets the definition of “quality control activities” in 40 C.F.R. §63.11180.
 - h. Surface coating or paint stripping activities that are covered under another area source NESHAP.

Some facilities subject to NESHAP HHHHHH may be below permitting thresholds as established in OAR 340-216-8010 table 1 part B. #53 or #59.

- 3. The facilities assigned to this General Permit may not emit any other air pollution that requires regulation beyond that specified in this permit, except for other pollution emissions that also qualify for assignment, and are assigned, to other General Permits and categorically insignificant activities defined by OAR Chapter 340, Division 200. A facility that has experienced reoccurring or serious compliance problems is not eligible for assignment to this permit.
- 4. If this General Permit does not cover all requirements applicable to the facility, the other applicable requirements must be covered by assignment to one or more General Permit Attachments in accordance with OAR 340-216-0062, otherwise the facility must obtain a Simple or Standard Permit. A facility requesting to be assigned to a General Permit Attachment, in accordance with OAR 340-216-0062, for a source category in a higher annual fee class, must be reassigned to the General Permit for the source category in the higher annual fee class.

ASSESSMENT OF EMISSIONS

- 5. Facilities assigned to this General Permit are sources of volatile organic compounds (VOC) and hazardous air pollutant (HAP) emissions. Facilities assigned to this permit may also be sources of carbon monoxide (CO), sulfur dioxides (SO₂) and nitrogen oxides (NO_x) emissions.
- 6. DEQ has assessed the level of emissions from these facilities and determined that facilities complying with the operational limits and monitoring requirements of this permit will remain area sources and compliant with applicable emissions limits. However, facilities assigned to this permit will be required to track solvent and coating use. If DEQ determines that facilities assigned to this permit have the potential to emit at or above permitted emissions limits, the permittee will be required to obtain a different permit or the permit will be revised to ensure that these facilities emit at appropriate levels.

SPECIFIC AIR PROGRAM APPLICABILITY

7. This permit incorporates the National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations in 40 C.F.R. part 63 subpart HHHHHH, for Paint Stripping and Miscellaneous Surface Coating Operations. EPA promulgated the NESHAP on January 9, 2008. The NESHAP is adopted as state rule in OAR 340-244-0220.
8. DEQ conducted a general activity-based risk screening for surface coating sources. Facilities that conduct surface coating with over 12 pounds of chrome per year are not eligible for assignment to the General permit. However, sources exceeding this threshold can demonstrate that the exclusion of trivalent chromium results in other chrome use being below the 12 pound per year limit.

COMPLIANCE ASSURANCE

9. Permittees are required to maintain records of notifications, coating usage, paint stripper usage, coating and paint stripper manufacturer or supplier documentation, training documentation, filter documentation, operational and maintenance activities, equipment documentation, and complaints received at the facility related to air pollution concerns. These items are reported to DEQ annually, as applicable.
10. DEQ staff members review annual report submittals and perform site inspections of the permitted facilities on a routine basis; inspections may be performed more frequently if complaints are received.

REVOCACTION OF ASSIGNMENT

11. Any facility that fails to demonstrate compliance or fails to conform to the requirements and limitations contained in the permit may have its assignment to the General Permit revoked. The facility would then be subject to more stringent level of permitting.

PUBLIC NOTICE

12. General Air Contaminant Discharge Permits are authorized by Oregon Administrative Rules and are part of the State Implementation Plan. As part of the General ACDP issuance process under OAR chapter 340 division 209, the public was provided at least 30 days to submit written comments. DEQ reviewed all comments received within the comment period and modified the permit in response to the comments.

DEFINITIONS

13. The terms not defined in the permit use the definition found in OAR 340-200-0020 or 40 C.F.R. part 63 subpart HHHHHH (§63.11180).

COMMENTS AND RESPONSES

Comment	The spray gun cleaning requirements under 40 CFR 63.11173(e)(4) are present in the old general permit but not in the draft general permit.
Response	This was an oversight; the General ACDP attachment included the applicable spray gun cleaning provisions while the General ACDP 27 did not. The General ACDP has been modified to include a new Condition 5.5 which mirrors the General ACDP attachment, aligns with federal requirements, and provides the applicable requirements for the Portland AQMA.
Comment	DEQ should consider changing all use of “chrome” to “chromium” in the draft permit as chromium is the element.
Response	DEQ agrees with the commenter. References to ‘chrome’ in the AQGP-27 have been revised as ‘chromium’.

AQGP-027r, surface coating
04/27/2010; 2/4/2021: DRD.