

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	Paint removal using methylene chloride, 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 PAINT STRIPPING OPERATIONS.....4
3.0 PLANT SITE EMISSION LIMITS5
4.0 RECORDKEEPING REQUIREMENTS5
5.0 REPORTING REQUIREMENTS6
6.0 ADMINISTRATIVE REQUIREMENTS7
7.0 FEES8
8.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS8

1.0 ATTACHMENT ASSIGNMENT

- 1.1. Qualifications** The permittee is performing paint stripping using methylene chloride for the removal of dried paint (including, but not limited to, paint, enamel, varnish, shellac, and lacquer) from wood, metal, plastic, and other substrates.
- 1.2. Exclusions** This attachment is not applicable to the following surface coating or paint removal activities:
- a. 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. 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. Paint stripping activities 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.
 - d. Paint stripping activities meeting the definition of “research and laboratory activities” in 40 CFR 63.1180.
 - e. Paint stripping activities meeting the definition “quality control activities” in 40 CFR 63.1180.
 - f. 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 PAINT STRIPPING OPERATIONS

- 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. 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:
- a. 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).
 - b. Evaluate each application to ensure that there is no alternative paint stripping technology that can be used.
 - c. Reduce exposure of all paint strippers containing MeCl to the air.
 - d. Optimize application conditions when using paint strippers containing MeCl to reduce MeCl evaporation (e.g., if the stripper must be heated, make sure that the temperature is kept as low as possible to reduce evaporation).
 - e. Practice proper storage and disposal of paint strippers containing MeCl (e.g., store stripper in closed, air-tight containers).
- 2.3. 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 2.2, as applicable, to the operation. The plan must be kept on site and be made available upon request.

2.4. 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.

3.0 PLANT SITE EMISSION LIMITS

3.1. 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
Single HAP	9	tons per year
Combined HAPs	24	tons per year

3.2. Annual Period The annual plant site emissions limits apply to any 12-consecutive calendar month period.

3.3. VOC and HAP PSEL Compliance Monitoring for Surface Coating Operations PSEL Compliance Monitoring Compliance with the PSELs is determined for each 12-consecutive calendar month period based on the following calculation:

$$E_{HAP} = [\sum(C_X * D_X * K_X) - W] \times 1 \text{ ton}/2000 \text{ lb.}$$

where,

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

C = Material usage for the period in gallons;

D = Material density in pounds per gallon; if K is in units of lb/lb, otherwise $D = 1$.

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

X = Subscript X represents a specific material;

W = Weight of HAP shipped offsite (lbs).

4.0 RECORDKEEPING REQUIREMENTS

4.1. General The permittee must maintain the following records:

- a. All notifications and reports submitted to the U.S. EPA and/or to DEQ.
- 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 attachment. 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.

4.2. 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.

4.3. Emissions

The permittee must maintain records of annual emissions as calculated according to Conditions 3.3, including the supporting process parameter and emission factor information.

5.0 REPORTING REQUIREMENTS

5.1. 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.

- a. For paint stripping operations existing on July 7, 2008, this notification must be submitted no later than January 11, 2010.
- b. For paint stripping operations constructed/installed after July 7, 2008, this notification must be submitted within 180 days of initial start-up of the operation.

5.2. 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.

- a. For stripping operations existing on July 7, 2008, this notification must be submitted not later than March 11, 2011.
- b. For stripping operations 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 2.3, 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.

5.3. Annual Report

For each year this attachment 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 attachment or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance.
- c. For each paint stripper used that contains MeCl, the MeCl content and amount used, in gallons.
- d. Annual emissions as calculated according to Conditions 3.3, including the supporting process parameter and emission factor information.
- e. Summary of complaints relating to air quality received by permittee during the year.

6.0 ADMINISTRATIVE REQUIREMENTS

6.1. Reattachment

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

- a. 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 General ACDP until DEQ takes final action on the application.
- b. If a complete application for reassignment to the attachment, or application made for a Simple or Standard permit in a timely manner, the attachment will not be deemed to expire until final action has been taken on the application.

7.0 FEES

- 7.1. 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.

8.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

ACDP	Air Contaminant Discharge Permit	MSDS	material safety data sheet
calendar year	The 12-month period beginning January 1st and ending December 31st	NESHAP	National Emissions Standards for Hazardous Air Pollutants
CFR	Code of Federal Regulations	OAR	Oregon Administrative Rules
DEQ	Oregon Department of Environmental Quality	ORS	Oregon Revised Statutes
EPA	US Environmental Protection Agency	SIC	Standard Industrial Code
HAP	Hazardous Air Pollutant as defined by OAR 340-244-0040	year	A period consisting of any 12-consecutive calendar months