

Department of Environmental Quality
Air Quality Program

GENERAL
AIR CONTAMINANT DISCHARGE PERMIT
ASSESSMENT REPORT

PAINT STRIPPING OPERATIONS

SOURCE DESCRIPTION AND QUALIFICATION

1. This general permit is designed to regulate air contaminant emissions from paint stripping operations subject to the Paint Stripping and Miscellaneous Surface Coating Operations NESHAP (40 CFR part 63 subpart HHHHHH). The Paint Stripping and Miscellaneous Surface Coating Operations NESHAP regulates facilities that have any of 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:
 - 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 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.
 - d. Paint stripping that meets the definition of “research and laboratory activities” in 40 CFR 63.11180.

- e. Paint stripping that meets the definition of “quality control activities” in 40 CFR 63.11180.
 - f. Paint stripping activities that are covered under another area source NESHAP.
3. Facilities eligible for assignment to this permit have not experienced recurring or serious compliance problems.
 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.
 5. 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

6. Facilities assigned to this General Permit are sources of hazardous air pollutant (HAP) emissions. Facilities assigned to this permit may also be sources of volatile organic compounds (VOC), particulate matter (PM), carbon monoxide (CO), sulfur dioxides (SO₂) and nitrogen oxides (NO_x) emissions.
7. DEQ has assessed the level of emissions of all air pollutants from these facilities and determined that facilities complying with the operational limits and monitoring requirements of this permit have emission levels below the established levels of concern stated in Tables 2 and 3 of OAR 340-200-0020.

SPECIFIC AIR PROGRAM APPLICABILITY

8. Facilities assigned to this General Permit are subject to the general visible emissions standards and nuisance requirements (control of fugitive dust and odors) in OAR Chapter 340, Division 208. The permit contains requirements and limitations to ensure compliance with these standards.
9. Facilities assigned to this General Permit are subject to 40 CFR part 63 subpart HHHHHH as adopted in OAR 340, Division 244. The permit contains requirements and limitations to ensure compliance with these standards. The following table lists the permit conditions that implement 40 CFR part 63 subpart HHHHHH.

40 CFR		Permit	
63.11169		1.1, 1.2	Purpose of NESHAP
63.11170		1.1	Affected facilities
63.11171		N/A	Affected processes
63.11172		3.1	Compliance dates

63.11173	a	3.2	Paint stripping management practices
	b	3.3	MeCl minimization plan
	c	5.2	MeCl usage records
	d	5.2	MeCl maintenance plan records
	e	N/A	Surface coating requirements
	f	N/A	Operator training requirements
	g	N/A	Operator training deadlines
63.11174		N/A	General provision applicability
63.11175		6.1, 6.2	Notifications
63.11176		6.3	Reporting
63.11177		5.1, 5.2	Recordkeeping
63.11178		5.4	Retention of records
63.11179		N/A	Who implements and enforces the NESHAP
63.11180		N/A	Definitions

COMPLIANCE ASSURANCE

10. Permittees are required to maintain records of notifications, production, compliance, work practice activities, and complaints received at the facility. These items are reported to DEQ annually, as applicable.
11. DEQ staff members perform site inspections of the permitted facilities on a routine basis, and more frequently if complaints are received.

REVOCAION OF ASSIGNMENT

12. Any facility that fails to demonstrate compliance, generates complaints, 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 a higher, more stringent level of permitting.

PUBLIC NOTICE

13. General Air Contaminant Discharge Permits are part of the State Implementation Plan. As part of the issuance process, the public will be provided 35 days to submit written comments. DEQ will review any comments and issue the permit in response to the comments.