



Lane Regional Air Protection Agency

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 National Emission Standards for Hazardous Air Pollutants (NESHAP) (40 CFR part 63 subpart HHHHHH) and using more than 20 gallons of coating per year. This general permit is also designed to regulate air contaminant emissions from paint stripping activities that utilize methylene chloride (MeCl). 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 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 the Paint Stripping and Miscellaneous Surface Coating Operations NESHAP as follows:
 - a. Motor vehicle or mobile equipment surface coating operations that receive an exemption from 40 CFR part 63 subpart HHHHHH because they do not spray apply coatings that contain target HAP.
 - b. Spray coating applications that meet the definition of facility maintenance or space vehicle in 40 CFR 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 CFR 63.11180.
 - g. Surface coating or paint stripping that meets the definition of “quality control activities” in 40 CFR 63.11180.
 - h. Surface coating or paint stripping activities that are covered under another area source NESHAP.
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 as defined under LRAPA title 12. 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 LRAPA 37-0062, 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 LRAPA 37-0062, 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 volatile organic compounds (VOC), particulate matter (PM) 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. The sources assigned to this General Permit are de minimis sources of particulate matter (PM), PM₁₀ (particulate matter no greater than 10 microns), and PM_{2.5} (particulate matter no greater than 2.5 microns).
7. LRAPA 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 of federal hazardous air pollutants and compliant with

applicable emission limits.

SPECIFIC AIR PROGRAM APPLICABILITY

8. Facilities assigned to this General Permit are subject to the general visible emissions standards, nuisance requirements (control of fugitive dust and odors) in LRAPA title 32 and 48. The permit contains requirements and limitations to ensure compliance with these standards.
9. The General Permit incorporates the regulations in 40 CFR part 63 subpart HHHHHH for the Paint Stripping and Miscellaneous Surface Coating Operations NESHAP. The General Permit contains requirements and limitations to ensure compliance with these regulations. EPA promulgated the NESHAP on January 9, 2008. This NESHAP is adopted in LRAPA title 44.
10. Oregon DEQ conducted a general activity based risk screening for surface coating sources assigned to their General Permit for sources subject to the Paint Stripping and Miscellaneous Surface Coating Operations NESHAP. Sources whose total use of chromium in the spray applied coatings equates to more than 12.0 pounds of chromium in any 12 consecutive month period are not eligible for assignment to this General Permit. However, sources exceeding this threshold are eligible for assignment to this General Permit if they can demonstrate that total hexavalent chromium usage in the spray applied coatings equates to no more than 12.0 pounds of hexavalent chromium in any 12 consecutive month period. This eligibility threshold and associated compliance demonstration, monitoring, and recordkeeping have been added to LRAPA's draft General Permit.

COMPLIANCE ASSURANCE

11. 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 LRAPA annually, as applicable.
12. LRAPA 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.

REVOCAION OF ASSIGNMENT

13. 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

14. General Air Contaminant Discharge Permits are incorporated into LRAPA Rules and Regulations by reference and are part of the State Implementation Plan. As part of the rulemaking process, the public will be provided at least 30 days to submit written comments on the draft General Permit and may request a public hearing. If a public hearing is requested, a notice of when and where the public hearing will be held will be provided at least 30 days in advance of the date of the public hearing. LRAPA will review any comments and may modify the General Permit in response to the comments. The final General Permit will be issued after approval by the LRAPA Director.

DEFINITIONS

15. The terms not defined in the General Permit use the definitions found in LRAPA title 12 or 40 CFR part 63 subpart HHHHHH.

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