LRAPA
Lane Regional Air Protection Agency

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Springfield, OR 97477

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December 10, 2021

Todd Fortier, Owner
Todd's Auto Body, Inc.
2325 Main Street
Springfield, OR 97477

Re: Motor Vehicle Surface Coating Operation Registered Source
Source No. 208296
Todd's Auto Body, Inc.
2325 and 2380 Main Street, Springfield, OR 97477

Dear Todd Fortier,

Your facility located at 2325 and 2380 Main Street, Springfield, Oregon is currently a registered source under LRAPA section 34-025 as a motor vehicle surface coating operation. On December 1, 2021, LRAPA renewed the General Air Contaminant Discharge Permit (ACDP) for sources subject to 40 CFR 63 subpart HHHHHH (6H). LRAPA is re-registering Todd's Auto Body, Inc., to include the updated requirements in the General ACDP as detailed in the attached document. In order to maintain your registration, the facility must maintain a certification through an LRAPA-approved environmental certification program, be subject to the motor vehicle surface coating operation area source NESHAP under 40 CFR 63 subpart 6H, and keep records demonstrating compliance with all applicable state and federal rules and regulations.

If you decide to discontinue your registration, or are unable to meet the requirements for registration you must submit an application for an air quality permit. LRAPA may rescind your registration if you no longer meet the requirements of LRAPA section 34-025 and the conditions of registration listed in the attached document. Nothing in this registration limits the ability of LRAPA to pursue enforcement action. LRAPA may inspect your facility in the future to verify that you continue to qualify for registration and comply with all applicable rules and regulations.

If you have any questions regarding this letter, please contact me at (541) 736-1056.

Sincerely,

Max Hueftle, P.E., BCEE
Operations Manager

1.0 NESHAP 6H APPLICABILITY

1.1. 40 CFR Part 63 Subpart HHHHHH – Emission Standards for Paint Stripping and Miscellaneous Surface Coating Operations

The registered source must comply with all applicable provisions of 40 CFR §63.11169 – §63.11180 for all affected emissions to which this subpart applies by the applicable date in §63.11172. The registered source must also comply with all applicable provisions of 40 CFR Part 63, Subpart A – NESHAP General Provisions. For a full text of the federal standard, please refer to 40 CFR Part 63, Subpart HHHHHH.

NESHAP Subpart HHHHHH is adopted and incorporated by reference in LRAPA title 44.

2.0 COATING APPLICATION TRAINING REQUIREMENTS

2.1. Operator Training

The registered source must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, are trained in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. 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 who meets the requirements of this condition. The training program must include, at a minimum, the following: [40 CFR 63.11173(f) and 40 CFR 63.11173(c)(1)]

a. A list of all current personnel by name and job description who are required to be trained; [40 CFR 63.11173(f)(1)]
b. Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the following topics: [40 CFR 63.11173(f)(2)(i)-(iv)]
    i. Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, 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 and overspray, including maintaining 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; and
    iv. Environmental compliance with the requirements of this registration.
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. [40 CFR 63.11173(f)(3)]

2.2. Operator Training Deadlines

All new and existing personnel, including contract personnel, who spray apply surface coatings must be trained in compliance with 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. [40 CFR 63.11173(g)]

a. Training and certification must be completed no later than 180 days after hiring. [40 CFR

63.11173(g)(1)&(2)]

b. An employee (transfer or hire) that has completed the required training, as specified in Condition 2.1, within five (5) years prior to the transfer or hire date, does not need to comply with Condition 2.2.a but instead may use the previous training completion date to extend the 180 day timeline, not to exceed five (5) years after the date on which the prior training was completed. [40 CFR 63.11173(g)(1)&(2)]

c. A registered source who can show, by documentation or certification, that a painter's work experience or training has resulted in training equivalent to all of the training requirements of Condition 2.1 is not required to provide the initial training to these painters, but must continue to comply with refresher training requirements of Condition 2.3. [40 CFR 63.11173(f)(3)]

2.3. Refresher Training

Training and certification will be valid for a period not to exceed five years after the date training is completed. The registered source must ensure that all required personnel receive refresher training and be re-certified every five years in accordance with the requirements in Condition 2.1. [40 CFR 63.11173(g)(3)]

3.0 COATING OPERATIONS REQUIREMENTS

3.1. Compliance Date

The registered source must be in compliance with all applicable Conditions of this registration upon initial startup or upon registration with LRAPA, whichever is later.

3.2. Spray Application Training

The spray application of surface coatings must only be conducted by persons who have completed the training described in Condition 2.1 by the deadlines in Condition 2.2. This Condition does not apply to the students of an accredited surface coating training program who are under the direct supervision of an instructor who meets the requirements of Condition 2.1.

3.3. Spray Booth or Enclosure

All spray-applied coatings must be applied in a spray booth, preparation station, or enclosure that meets the requirements in Condition 3.3.a and either Condition 3.3.b, 3.3.c, or 3.3.d. Registered sources that use one enclosure or booth and alternate between Conditions 3.3.b, 3.3.c, or 3.3.d must retain documentation of the change according to Condition 6.2.d.

a. **All Spray Applied Coatings**: All spray booths, preparation stations, or mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98% capture of paint overspray. This requirement does not apply to waterwash spray booths that are operated and maintained according to the manufacturer's specifications. [40 CFR 63.11173(e)(2)(i)]

   i. The registered source may use published filter efficiency data provided by filter vendors or manufacturers to demonstrate compliance with this requirement. [40 CFR 63.11173(e)(2)(i)]

   ii. If the registered source does not have filter efficiency data from the vendor or manufacturer, the registered source must follow the procedures for demonstrating filter efficiency as described by ASHRAE Method 52.1 and 40 CFR

§63.1173(e)(2)(i). [40 CFR 63.11173(e)(2)(i)]

b. **Option 1 for Spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment**: must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. If a spray booth is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to, but not more than 0.05 inches water gauge positive pressure. [40 CFR 63.11173(e)(2)(ii)]

c. **Option 2 for Spray booths and preparation stations that are used to coat miscellaneous parts and products or vehicle subassemblies**: 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. [40 CFR 63.11173(e)(2)(iii)]

d. **Option 3 for 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. [40 CFR 63.11173(e)(2)(iv)]

3.4. Spray Equipment

All spray-applied coatings must be applied as follows:

a. The registered source must only spray apply coatings with an HVLP spray gun, electrostatic application, airless spray gun, or air-assisted airless spray gun. [40 CFR 63.11173(e)(3)]
   i. The registered source may request to use an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation.
   ii. An equivalent technology request must use the procedure in 40 CFR §63.11173(e)(3), and receive written approval from LRAPA before being used.
   iii. Approval of alternative equipment in lieu of HVLP equipment for operations subject to NESHAP HHHHHH from the EPA may be used without previous LRAPA approval if all conditions of the EPA approval are complied with and a copy of the EPA approval is retained onsite at all times.

b. The spray-equipment requirement of Condition 3.4.a does not apply to the following: [40 CFR 63.11173(e)(3)]
   i. Painting performed by students and instructors at paint training center;
   ii. 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;
   iii. The application of coatings on aerospace vehicles that contain fillers that adversely affect atomization with HVLP spray guns; or
   iv. The application of coatings on aerospace vehicles that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.).

3.5. Spray Gun Cleaning

All paint spray gun 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. Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of non-atomizing methods may also be used. [40 CFR 63.11173(e)(4)

4.0 PAINT STRIPPING ACTIVITIES

4.1. Applicability

This section (Condition 4.0) applies to facilities that use paint stripping products that contain methylene chloride (MeCl) to remove dried paint (including, but not limited to, enamel, varnish, shellac, and lacquer) from any surface.

4.2. Compliance Date

The registered source must be in compliance with all applicable Conditions of this registration upon initial startup or upon registration with LRAPA, whichever is later.

4.3. Management Practices

The registered source must implement management practices to minimize evaporative emissions of MeCl. The registered source must keep an employee manual, written Standard Operating Procedures, or equivalent documentation that describes the management practices implemented on site. The management practices documentation (minimization plan) must be kept on site at all times and include, at a minimum, descriptions of how the following are complied with:

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); [40 CFR 63.11173(a)(1)]
b. Evaluate each application where a paint stripper containing MeCl is used to ensure that there is no alternative paint stripping technology that can be used; [40 CFR 63.11173(a)(2)]
c. Reduce the exposure of all paint strippers containing MeCl to the air; [40 CFR 63.11173(a)(3)]
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); and [40 CFR 63.11173(a)(4)]
e. Practice proper storage and disposal of paint strippers containing MeCl (e.g., store stripper in closed, airtight containers). [40 CFR 63.11173(a)(5)]

4.4. One Ton of Methylene Chloride Use per Year

For each paint stripping operation that uses more than one ton of MeCl per year:

a. The registered source must post a placard or sign outlining the MeCl minimization plan (Condition 4.3) in each area where paint stripping operations occur; and
b. The registered source must conduct an annual review of the written management practices required by Condition 4.3 and update the documentation as appropriate.

5.0 PLANT SITE EMISSION LIMITS

5.1. Plant Site Emission Limits (PSEL)

Plant site emissions must not exceed the following: [LRAPA 42-0040 and 42-0060]

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

Compliance with the VOC and HAP PSELs is determined for each 12-consecutive calendar month period based on material throughput for the reporting period. [LRAPA 42-0080]

a. Presumed Compliance Threshold: Facilities will be presumed to be in compliance with the PSEL of Condition 5.1. if all of the following are met:
   i. The highest VOC content among coatings used does not exceed 8.9 lbs/gallon;
   ii. The highest HAP content (all HAPs combined) among coatings used does not exceed 8.9 lbs/gallon;
   iii. No paint strippers containing MeCl are used; and
   iv. Coating and paint stripper usage does not exceed 2,000 gallons in any 12-consecutive calendar month period.

b. If the registered source exceeds or cannot use the presumed compliance threshold stated above, the registered source must demonstrate compliance with the yearly VOC and HAP PSELs on a monthly basis as follows:

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

where,

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

Σ = Summation of;

C = Material usage for the period, in gallons or pounds;

K = VOC or HAP content of the material, as pounds per gallon or percent by weight, as applicable; and

X = Subscript X represents a specific material.

6.0 RECORDKEEPING REQUIREMENTS

6.1. General

The registered source must maintain the following records: [LRAPA 34-016]

a. All notifications and reports submitted to LRAPA in accordance with this registration;

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;

and

c. Records of any deviation from the requirements in this registration. These records must include the date and time period of the deviation, a description of the nature of the deviation, and the actions taken to correct the deviation.

6.2. Coating Operations

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

a. **Training**. Certification that each painter has completed the training specified in Condition 2.1. with the date the initial training and the most recent refresher training was completed. [40 CFR 63.11177(a)]

b. **Filter Efficiency**. Documentation of the filter efficiency of all spray booth exhaust filter materials as specified in Condition 3.3. If the registered source demonstrates compliance by using ASHRAE Method 52.1 and 40 CFR §63.1173(e)(2)(i), the registered source must also retain all supporting documentation. [40 CFR 63.11177(b)]

c. **Filter Replacement**. Each date filters used to comply with Condition 3.3 were replaced. [LRAPA 34-016(1)]

d. **Alternate Compliance Options**. Documentation of all date(s) each enclosure or booth alternates to a different compliance option according to Condition 3.3. [LRAPA 34-016(1)]

e. **HVLP or Alternatives**. Documentation from the spray gun manufacturer that each spray gun with cup capacity equal to or greater than 3.0 fluid ounces (89 cc) meets the definition of HVLP spray gun. Alternatively, for each spray gun that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, the registered source must retain documentation from the spray gun manufacturer that each spray gun achieves a transfer efficiency equivalent to that of an HVLP spray gun. The registered source must retain a copy of the EPA or LRAPA approval for the alternative equipment and documentation of compliance with any conditions of the alternative approval in accordance with Condition 3.4, as applicable. [40 CFR 63.11177(c) and LRAPA 34-016(1)]

f. **HVLP Exemptions**. Documentation of each occurrence of coating activities that did not comply with the spray-applied coating requirements of Condition 3.4.a due to the applicability of an exemption in Condition 3.4.b. Records must include the date and identification of which specific exemption applied to each application. [LRAPA 34-016(1)]

g. **Coatings**. SDS or equivalent documentation provided by the supplier or manufacturer for each coating and solvent on site. [LRAPA 34-016(1)]

h. **Notifications**. Copies of all notifications submitted as required by 40 CFR §63.11175 and copies of any report submitted as required by 40 CFR §63.11176. [40 CFR 63.11177(d)].

6.3. Methylene Chloride Stripping Operations

The registered source must maintain the following records related to all paint stripping operations:

a. Information about each MeCl-containing paint stripper used for paint stripping operations at the facility. This must include the MeCl content of the paint stripper and the amount of the paint stripper used per month. [40 CFR 63.11177(e) and LRAPA 34-016(1)]

i. SDS, other documentation provided by the supplier or manufacturer, or engineering calculations are sufficient to document the paint stripper MeCl content. [40 CFR 63.11177(e)]
ii. Purchase receipts or itemized invoices are sufficient to document paint stripper usage. [40 CFR 63.11177(e)]

b. Documentation of the management practices required by Condition 4.3 that are implemented on site. The registered source is required to maintain a record of the current MeCl minimization plan on site for as long as the source is a registered source and uses MeCl-containing paint strippers.
c. **For each paint stripping operation that uses more than one ton of MeCl per year**: A record of the annual review, and update of, the written MeCl minimization work practices implemented on site as required by Condition 4.4. [40 CFR 63.11177(f)]

6.4. Emissions
The registered source must maintain records of monthly and annual emissions, monthly and annual coating and solvent usage, and the VOC and HAP content of each coating and solvent used. [LRAPA 34-016(1)]

6.5. Complaint Log
The registered source must maintain a log of all complaints received that specifically refer to air pollution, odor, or nuisance concerns associated with the registered source. The registered source must investigate the condition within 24 hours, if possible. The log must include at least the following for each complaint or concern received: [LRAPA 34-016(1)]

a. The date the complaint was received;
b. The date and time the complaint states the condition was present;
c. A description of the complaint;
d. The location of the complainant or receptor relative to the plant site;
e. The status of plant operations and activities during the complaint's stated time of pollution or odor condition;
f. A description of the registered source's actions to investigate the validity of the complaint; and
g. A description of any actions taken in response to the complaint investigation.

6.6. Retention of Records
Unless otherwise specified, the registered source must retain all records for a period of at least five (5) years from the date of each report or record and make them available to LRAPA upon request. The registered source must maintain at least the two (2) most recent years of records onsite or otherwise readily available electronically for expeditious review during an on-site inspection. [40 CFR 63.11178(a) and LRAPA 34-016(5)]

7.0 REPORTING REQUIREMENTS
7.1. Initial Notification and Notification of Compliance Status (NESHAP HHHHHH)
The registered source must submit an initial notification in accordance with 40 CFR §63.11175(a) and a notification of compliance status in accordance with 40 CFR §63.11175(b). Forms for these purposes are available from LRAPA. The notifications must comply with the

following:

a. For surface coating or paint stripping operations existing on July 7, 2008, the notifications must be submitted within 30 days after registration with LRAPA; or
b. For sources constructed or installed after July 7, 2008, the notifications must be submitted within 180 days of initial start-up of the surface coating/paint stripping operation or within 30 days of registration with LRAPA, whichever is later.
c. The notifications required by Conditions 7.1.a and 7.1.b must be sent to the LRAPA address as identified in Condition 8.2.

7.2. Annual Report

For each year this registration is in effect, the registered source must submit to LRAPA by **February 15,** one (1) copy of the following information for the previous calendar year: [LRAPA 34-016(1)&(2)]

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; [40 CFR 63.11176(a)(1)]
b. The name, title, address, telephone, email address (if available), and signature of the company official certifying the truth, accuracy, and completeness of the report; [40 CFR 63.11176(a)(2)]
c. A statement of whether the source has complied with all the applicable standards and other requirements of this registration or an explanation of any noncompliance and a description of corrective actions being taken or that were taken to achieve compliance; [40 CFR 63.11176(a)(2)]
d. Notification of any changes to the information submitted in an initial notification or notification of compliance status, including: [40 CFR 63.11176(a)]
    i. Number and type of spray booths at the location;
    ii. Number of preparation stations or types of items sprayed at the location
    iii. Number of painters usually employed at the operation;
    iv. Method(s) of paint stripping employed on site or types of substrates stripped; and
    v. Whether methylene chloride is used on site;
e. For each spray-applied coating: [34-016(1)&(2)]
    i. The manufacturer;
    ii. The product number or identification;
    iii. The coating density in pounds per gallon;
    iv. All metal HAP(s) in the coating and the percent weight content of each HAP present;
    v. The VOC content of each coating in pounds per gallon; and
    vi. The amount of each coating used, in gallons.
f. For each paint stripper used: [34-016(1)&(2)]
    i. The manufacturer;
    ii. The product number or identification;
    iii. The product density in pounds per gallon;
    iv. The VOC content of each paint stripper in pounds per gallon;
    v. The MeCl content of each paint stripper in percent by weight; and
    vi. The amount of each paint stripper used, in gallons.

g. Summary of complaints relating to air quality received by registered source during the year; and [34-016(1)&(2)]
h. If the registered source has exceeded the presumed compliance threshold in Condition 5.3.a, the total VOC and HAP emissions for each calendar month and the total VOC and HAP emissions for each 12 consecutive calendar month period. [34-016(1)&(2)]
i. Re-registration information required by Condition 8.1. [34-016(1)&(2)]]

7.3. Notice of Change of Ownership or Company Name

If a registered source is sold or transferred, the sale or transfer must be reported to LRAPA by either the former owner or the new owner with 30 days of the date of sale or transfer. The new owner of the registered source must register the source within 30 days of teh date of sale or transfer in accordance with LRAPA subsections 34-030(2) and (4). [LRAPA 34-030(9)]

7.4. Construction or Modification Notices

The registered source must notify LRAPA in writing using a LRAPA "Notice of Construction Form" and obtain approval in accordance with LRAPA title 34 before:

a. Constructing, installing, or establishing a new stationary source that will cause an increase in any regulated pollutant emissions; [LRAPA 34-034(1)]
b. Making any physical change or change in operation of an existing stationary source that will cause an increase, on an hourly basis at full production, in any regulated pollutant emissions; or [LRAPA 34-034(2)]
c. Constructing or modifying any air pollution control equipment. [LRAPA 34-034(3)]

7.5. Where to Send Reports and Notices

Reports, with the source number prominently displayed, must be sent to the LRAPA address as identified in Condition 8.2.

8.0 ADMINISTRATIVE REQUIREMENTS

8.1. Re-registration

a. In order to re-register or maintain registration, a person responsible for an air contaminant source must reaffirm in writing in the facility's annual report (see Condition 7.2) the correctness and current status of the information furnished to LRAPA. [LRAPA 34-030(6)]
b. Any changes in any of the factual data reported in the source's application as required under LRAPA subsections 34-030(3) and (4) must be reported to LRAPA, at which time re-registration may be required on forms furnished by LRAPA. [LRAPA 34-030(7)]
c. In order to re-register, a facility must not have had their registration terminated or revoked within the last 3 years, unless the air contaminant source has changed ownership since termination or revocation, in which case the source must not have had their registration terminated or revoked since the change in ownership. [LRAPA 34-030(8)]

8.2. LRAPA Address

All reports, notices, applications, and fees must be directed to LRAPA as follows:

Lane Regional Air Protection Agency

1010 Main Street
Springfield, OR 97477
541-736-1056

8.3. LRAPA's Website
Information about LRAPA's registration sources, air quality permits, and regulations may be obtained from the LRAPA web page at www.lrapa.org.

9.0 FEES
9.1. Annual Registration Fee
The annual fee specified in LRAPA section 37-8020, Table 2, Part 6 for a motor vehicle surface coating operation is due on or by **December 1** of each year this facility is a registered source. An invoice indicating the amount, as determined by LRAPA regulations, will be mailed prior to the above date. Late fees in accordance with LRAPA section 37-8020, Table 2, Part 5 will be assessed as appropriate.

9.2. Where to Submit Fees
Fees, with a source number prominently displayed, must be sent to the LRAPA address as identified in Condition 8.2.

10.0 GENERAL CONDITIONS AND DISCLAIMERS
10.1. Other Regulations
In addition to the specific requirements listed in this registration, the registered source must comply with all other applicable legal requirements enforceable by LRAPA. [ORS 468A.060 and LRAPA 12-001(2)]

10.2. Conflicting Conditions
In any instance in which there is an apparent conflict relative to conditions in this registration, the most stringent conditions apply.

10.3. Masking of Emissions
The registered source must not cause or permit the installation of any device or use any means designed to mask the emissions of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement. [LRAPA 32-050]

10.4. LRAPA Access
The registered source must allow LRAPA's representatives access to the plant site and pertinent records at all reasonable times for the purposes of performing inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant emissions discharge records and conducting all necessary functions related to this registration in accordance with LRAPA section 13-020. [ORS 468.095(1) and LRAPA 13-020(1)(h)]

10.5. Outdoor Burning
The registered source must not conduct any outdoor burning except as allowed by LRAPA title 47. [LRAPA 47-015(4)&(5)]

10.6. Asbestos
The registered source must comply with the asbestos abatement requirements in LRAPA title 43 for all activities involving asbestos-containing materials, including, but not limited to, demolition, renovation, repair, construction, and maintenance.

10.7. Property Rights
The issuance of this registration does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.

10.8. Revocation
LRAPA may revoke a registration if a source fails to meet any requirement in LRAPA section 34-030. [LRAPA 34-025(7)]

11.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

11.1. Abbreviations and Acronyms

ACDP	Air Contaminant Discharge Permit
ASHRAE	American Society of Heating, Refrigerating, and Air-Conditioning Engineers
AQMA	Air Quality Maintenance Area
calendar year	The 12-month period beginning January 1st and ending December 31st
CAO	Cleaner Air Oregon
Cd	Cadmium
CFR	Code of Federal Regulations
Cr	Chromium
DEQ	Oregon Department of Environmental Quality
EPA	US Environmental Protection Agency
HAP	Hazardous Air Pollutant as defined LRAPA title 44
HVLP	high velocity low pressure
LRAPA	Lane Regional Air Protection Agency
MeCl	Methylene chloride
metal HAP	chromium, manganese, lead, nickel, cadmium
Mn	Manganese
SDS	safety data sheet
NESHAP	National Emissions Standards for Hazardous Air Pollutants
Ni	Nickel
OAR	Oregon Administrative Rules
ORS	Oregon Revised Statutes
Pb	lead

PSEL	Plant Site Emission Limit	year	A period consisting of any 12-consecutive calendar months
SIC	Standard Industrial Code		
target HAP	chromium, manganese, lead, nickel, cadmium		
VOC	volatile organic compound		

11.2. Definitions

Facility Maintenance: surface coating performed as part of the routine repair or renovation of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity. Facility maintenance also includes surface coating associated with the installation of new equipment or structures, and the application of any surface coating as part of janitorial activities. Facility maintenance includes the application of coatings to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs. Facility maintenance also includes the refinishing of mobile equipment in the field or at the site where they are used in service and at which they are intended to remain indefinitely after refinishing. Such mobile equipment includes, but is not limited to, farm equipment and mining equipment for which it is not practical or feasible to move to a dedicated mobile equipment refinishing facility. Facility maintenance does not include surface coating of motor vehicles, mobile equipment, or items that routinely leave and return to the facility, such as delivery trucks, rental equipment, or containers used to transport, deliver, distribute, or dispense commercial products to customers, such as compressed gas canisters. [40 CFR 63.11180]

High-volume, low-pressure (HVLP) spray equipment: spray equipment that is permanently labeled as such and used to apply any coating by means of a spray gun which is designed and operated between 0.1 and 10 pounds per square inch gauge (psig) air atomizing pressure measured dynamically at the center of the air cap and at the air horns. [40 CFR 63.11180]

Military Munitions: all ammunition products and components produced or used by or for the U.S. Department of Defense (DoD) or for the U.S. Armed Services for national defense and security, including military munitions under the control of the Department of Defense, the U.S. Coast Guard, the National Nuclear Security Administration (NNSA), U.S. Department of Energy (DOE), and National Guard personnel. The term military munitions includes: confined gaseous, liquid, and solid propellants, explosives, pyrotechnics, chemical and riot control agents, smokes, and incendiaries used by DoD components, including bulk explosives and chemical warfare agents, chemical munitions, biological weapons, rockets, guided and ballistic missiles, bombs, warheads, mortar rounds, artillery ammunition, small arms ammunition, grenades, mines, torpedoes, depth charges, cluster munitions and dispensers, demolition charges, nonnuclear components of nuclear weapons, wholly inert ammunition products, and all devices and components of any items listed in this definition. [40 CFR 63.11180]

Paint stripping: the removal of dried coatings from wood, metal, plastic, and other substrates. A single affected source may have multiple paint stripping operations. [40 CFR 63.11180]

Quality Control Activities: surface coating or paint stripping activities that meet *all* of the following criteria:
(1) The activities associated with a surface coating or paint stripping operation are intended to detect and correct defects in the final product by selecting a limited number of samples from the operation, and comparing the samples against specific performance criteria; and
(2) The activities do not include the production of an intermediate or final product for sale or exchange for commercial profit; for example, parts that are surface coated or stripped are not sold and do not leave the facility; and
(3) The activities are not a normal part of the surface coating or paint stripping operation; for example, they do not include color matching activities performed during a motor vehicle collision repair; and
(4) The activities do not involve surface coating or stripping of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity; that is, the activities are not facility maintenance.
[40 CFR 63.11180]

Research and Laboratory Activities: surface coating or paint stripping activities that meet *one* of the following criteria:
(1) Conducted at a laboratory to analyze air, soil, water, waste, or product samples for contaminants, or environmental impact; or
(2) Activities conducted to test more efficient production processes, including alternative paint stripping or surface coating materials or application methods, or methods for preventing or reducing adverse environmental impacts, provided that the activities do not include the production of an intermediate or final product for sale or exchange for commercial profit; or
(3) Activities conducted at a research or laboratory facility that is operated under the close supervision of technically trained personnel, the primary purpose of which is to conduct research and development into new processes and products and that is not engaged in the manufacture of products for sale or exchange for commercial profit.
[40 CFR 63.11180]

11.3. Calculating Chromium Use

The registered source must be continually able to demonstrate that the total use of chromium in spray applied coatings does not equate to more than 12.0 pounds of chromium in any 12 consecutive month period as follows: [OAR 340-245-0110]

$$C = \sum (V \cdot D \cdot C_{\%})$$

Where,
C = Mass of chromium used for each 12 consecutive calendar month period, in pounds;
Σ = Summation of;
V = Volume of coating used, in gallons;
D = Density of coating, in pounds per gallon; and
$C_{\%}$ = Mass of chromium in the coating, as a percent by weight.

Sources that use spray applied coatings equivalent to over 12.0 pounds of chromium in any 12 consecutive month period may be eligible for assignment to this registration 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.

Example:

75 gallons of coating X used	125 gallons of coating Y used
Coating X = 3.5 lbs/gallon	Coating Y = 5.7 lbs/gallon
Coating X = 1% chromium and chromium compounds by weight	Coating Y = 1.2% chromium and chromium compounds by weight
Calculation	
75 gal X 3.5 lbs/gal = 262.5 lbs coating used	125 gal X 5.7 lbs/gal = 712.5 lbs coating used
262.5 lbs X 0.01 percent chromium = 2.62 lbs	712.5 lbs X 0.012 percent chromium = 8.55 lbs
Total chromium 11.17 lbs = 2.62 lbs + 8.55 lbs	

JJW 12/09/2021: rr