



**ASSIGNMENT TO  
GENERAL AIR CONTAMINANT DISCHARGE PERMIT**

Lane Regional Air Protection Agency  
1010 Main Street  
Springfield, OR 97477  
Telephone: (541) 736-1056

Issued To:  
**Lee Manufacturing LLC**  
4051 West 1<sup>st</sup> Avenue  
Eugene, OR 97402

Information Relied Upon:  
Application Number: 70186  
Dated: January 29, 2024

Plant Site Location:  
**Image King Signs**  
4051 West 1<sup>st</sup> Avenue  
Eugene, OR 97402

Land Use Compatibility Statement:  
From: City of Eugene  
Dated: November 8, 2011

**ASSIGNMENT:** The permittee identified above is assigned by the Lane Regional Air Protection Agency to the General ACDP listed below in accordance with ORS 468A.040, LRAPA Title 37 Section 37-0060(2), and based on the land use compatibility findings included in the permit record.

  
\_\_\_\_\_  
Susannah Sbragia, Interim Director

2-27-2024  
\_\_\_\_\_  
Effective Date

General ACDP Issued in Accordance with LRAPA Section 37-0060:

General ACDP Number	Expiration Date	Source Category Description
AQGP-027	December 1, 2031	Paint stripping operations, autobody refinishing operations, and spray application of coatings subject to 40 CFR part 63 subpart HHHHHH, using more than 20 gallons of coating per year, as adopted under LRAPA titles 37 and 44.

**SUPPLEMENTAL INFORMATION:**

<b>Facility Contact:</b>		
Name:	Nick Lee, Member	
Phone number:	541-740-6955	
Email address:	N/A	
<b>Permit Summary:</b>		
Source Test Requirement	No	N/A
NSPS (40 CFR Part 60)	No	N/A
NESHAP (40 CFR Part 63)	Yes	Subpart HHHHHH (6H)
<b>Reports Required:</b>		
Annual	Yes	February 15
NSPS	No	N/A
NESHAP	No	N/A
Other	N/A	N/A
<b>Public Notice:</b>	Category I	

JJW:RR 02/14/2024



**LANE REGIONAL AIR PROTECTION AGENCY**  
**GENERAL**  
**AIR CONTAMINANT DISCHARGE PERMIT**

Lane Regional Air Protection Agency  
1010 Main Street  
Springfield, OR 97477  
Telephone: (541) 736-1056

This permit is issued in accordance with the provisions of ORS 468A.040 and LRAPA 37-0060.

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**ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY**

*Steven A. Dietrich*  
\_\_\_\_\_  
Steven A. Dietrich, Director

*12-1-21*  
\_\_\_\_\_  
Dated

Paint stripping operations, autobody refinishing operations, and spray application of coatings subject to 40 CFR part 63 subpart HHHHHH, using more than 20 gallons of coating per year, as adopted under LRAPA titles 37 and 44.

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## **1.0 PERMIT ASSIGNMENT**

### **1.1. Qualifications**

The permittee must meet all of the following conditions in order to qualify for assignment to this General Air Contaminant Discharge Permit (ACDP):

- a. The permittee performs at least one of the following activities:
  - i. Paint stripping using 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;
  - ii. Spray application of coatings to motor vehicles and mobile equipment including operations located at stationary structures in fixed locations and mobile operations that travel to the customer's location; or
  - iii. Spray application of coatings that contain target Hazardous Air Pollutant(s) (HAP) - compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).
- b. The permittee's 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. See Condition 13.2;
- c. The source does not qualify for a Basic ACDP and a Simple or Standard ACDP is not required for the source; and
- d. The source is not having ongoing, recurring or serious compliance problems.

### **1.2. Exclusions**

This permit is not applicable to the following surface coating or paint stripping operations or activities:

- a. Operations that meet the criteria in Condition 1.1.a that have received a conditional exemption from LRAPA for either this General ACDP or NESHAP 6H (40 CFR part 63 subpart HHHHHH) and continue to meet the criteria for conditional exemption;
- b. Spray coating applications that meet the definition of "facility maintenance" or "space vehicle" as defined in Condition 13.2;
- 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 Condition 13.2, 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 vehicles, possessions, or property, either as a hobby or for maintenance of their personal vehicles, possessions or property. This permit does not apply when these operations are performed by individuals for others without compensation. An individual who spray applies surface coating to more than two motor vehicles or pieces of mobile equipment per year is subject to the requirements in this permit regardless of whether compensation is received;
- f. Surface coating or paint stripping that meets the definition of "research and laboratory activities" in Condition 13.2;

- g. Surface coating or paint stripping that meets the definition “quality control activities” in Condition 13.2; and
- h. Surface coating or paint stripping activities that are covered under an area source NESHAP other than 40 CFR part 63 subpart HHHHHH.

### **1.3. Assignment**

LRAPA will assign qualifying permittees to this permit that have and maintain a good record of compliance with LRAPA’s Air Quality regulations and that LRAPA determines would be appropriately regulated by a General ACDP. LRAPA may rescind assignment if the permittee no longer meets the qualifications in Condition 1.1, conditions of LRAPA section 37-0060, or the Conditions of this permit.

### **1.4. Permitted Activities**

Until this permit expires, is modified, or is revoked, the permittee is allowed to discharge air contaminants from processes and activities directly related to or associated with the air contaminant source(s) listed on the first page of this permit in addition to any categorically insignificant activities, as defined in LRAPA title 12, at the source. Discharge of air contaminants from any other equipment or activity not identified herein is not authorized by this permit.

### **1.5. Relation to Local Land Use Laws**

This permit is not valid outside of Lane County, or at any location where the operation of the permittee’s processes, activities, and insignificant activities would be in violation of any local land use or zoning laws. For operation outside of Lane County, contact the Oregon Department of Environmental Quality for any necessary permits at (503) 229-5359. It is the permittee’s sole responsibility to obtain local land use approvals as, or where, applicable before operating this facility at any location.

## **2.0 GENERAL EMISSION STANDARDS AND LIMITS**

### **2.1. Visible Emissions**

The permittee must comply with the following visible emission limits:

- a. Visible emissions from any air contaminant source must not equal or exceed an average of 20% opacity for a period or periods aggregating more than 3 minutes in any one hour; [LRAPA 32-010(3)]
- b. Aggregate times consist of the total duration of all reading during the observation period that are equal to or greater than the opacity percentage in the standard, whether or not the readings are consecutive; and [LRAPA 32-010(2)]
- c. The visible emission standard in this condition does not apply to fugitive emissions from a source or part of a source. [LRAPA 32-010(1)]

### **2.2. Fugitive Emissions**

The permittee must comply with the following:

- a. The permittee must take reasonable precautions to prevent particulate matter, including fugitive dust, from becoming airborne from all site operations from which it may be generated; [LRAPA 48-015(1)]

- b. The permittee must not allow visible fugitive particulate emissions to leave the permittee's property for a period or periods totaling more than 18 seconds in a six-minute period; [LRAPA 48-015(2)(a)]
- c. Compliance with the fugitive emissions standard in Condition 2.2.b is determined by EPA Method 22 at the downwind property boundary; and [LRAPA 48-015(2)(b)]
- d. If requested by LRAPA, the permittee must develop and implement a fugitive emission control plan to prevent any visible emissions from leaving the property of a source for more than 18 seconds in a six-minute period following the procedures of EPA Method 22. [LRAPA 48-015(3)]

### **2.3. Particulate Matter Fallout**

The permittee must not cause or permit the emission of any particulate matter larger than 250 microns in size at sufficient duration or quantity, as to create an observable deposition upon the real property of another person. [LRAPA 32-055]

### **2.4. Nuisance Prohibited**

The permittee must not cause or allow air contaminants from any source subject to regulation by LRAPA to cause a nuisance. [LRAPA 49-010(1)]

## **3.0 NESHAP 6H APPLICABILITY**

### **3.1. 40 CFR Part 63 Subpart HHHHHH – Emission Standards for Paint Stripping and Miscellaneous Surface Coating Operations**

The permittee 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 permittee 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.

## **4.0 COATING APPLICATION TRAINING REQUIREMENTS**

### **4.1. Operator Training**

The permittee 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 permit.
- 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)]

#### **4.2. 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 4.1, within five (5) years prior to the transfer or hire date, does not need to comply with Condition 4.2.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 permittee 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 4.1 is not required to provide the initial training to these painters, but must continue to comply with refresher training requirements of Condition 4.3. [40 CFR 63.11173(f)(3)]

#### **4.3. Refresher Training**

Training and certification will be valid for a period not to exceed five years after the date training is completed. The permittee must ensure that all required personnel receive refresher training and be re-certified every five years in accordance with the requirements in Condition 4.1. [40 CFR 63.11173(g)(3)]

## **5.0 COATING OPERATIONS REQUIREMENTS**

### **5.1. Compliance Date**

The permittee must be in compliance with all applicable Conditions of this permit upon initial startup or assignment to this permit, whichever is later.

### **5.2. Spray Application Training**

The spray application of surface coatings must only be conducted by persons who have completed the training described in Condition 4.1 by the deadlines in Condition 4.2. 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 4.1.

### 5.3. 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 5.3.a and either Condition 5.3.b, 5.3.c, or 5.3.d. Permittees that use one enclosure or booth and alternate between Conditions 5.3.b, 5.3.c, or 5.3.d must retain documentation of the change according to Condition 8.2.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 permittee 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 permittee does not have filter efficiency data from the vendor or manufacturer, the permittee must follow the procedures for demonstrating filter efficiency as described by ASHRAE Method 52.1 and 40 CFR §63.11173(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)]

### 5.4. Spray Equipment

All spray-applied coatings must be applied as follows:

- a. The permittee 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 permittee 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 5.4.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.).

### **5.5. 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)]

## **6.0 PAINT STRIPPING ACTIVITIES**

### **6.1. Applicability**

This section (Condition 6.0) 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.

### **6.2. Compliance Date**

The permittee must be in compliance with all applicable Conditions of this permit upon initial startup or assignment to this permit, whichever is later.

### **6.3. Management Practices**

The permittee must implement management practices to minimize evaporative emissions of MeCl. The permittee 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)]

#### 6.4. 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 permittee must post a placard or sign outlining the MeCl minimization plan (Condition 6.3) in each area where paint stripping operations occur; and
- b. The permittee must conduct an annual review of the written management practices required by Condition 6.3 and update the documentation as appropriate.

## 7.0 PLANT SITE EMISSION LIMITS

### 7.1. 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

### 7.2. Annual Period

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

### 7.3. 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 7.1. 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 permittee exceeds or cannot use the presumed compliance threshold stated above, the permittee must demonstrate compliance with the yearly VOC and HAP PSELs on a monthly basis as follows:

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

where,

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

$\Sigma$  = 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.

## 8.0 RECORDKEEPING REQUIREMENTS

### 8.1. General

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

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

### 8.2. Coating Operations

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

- a. **Training.** Certification that each painter has completed the training specified in Condition 4.1. 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 5.3. If the permittee demonstrates compliance by using ASHRAE Method 52.1 and 40 CFR §63.1173(e)(2)(i), the permittee must also retain all supporting documentation. [40 CFR 63.11177(b)]
- c. **Filter Replacement.** Each date filters used to comply with Condition 5.3 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 5.3. [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 permittee 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 permittee 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 5.4, 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 5.4.a due to the applicability of an exemption in Condition 5.4.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)].

### 8.3. Methylene Chloride Stripping Operations

The permittee 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 6.3 that are implemented on site. The permittee is required to maintain a record of the current MeCl minimization plan on site for as long as the permittee is assigned to this permit 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 6.4. [40 CFR 63.11177(f)]

### 8.4. Emissions

The permittee 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)]

### 8.5. Complaint Log

The permittee must maintain a log of all complaints received that specifically refer to air pollution, odor, or nuisance concerns associated with the permitted facility. The permittee 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 permittee's actions to investigate the validity of the complaint; and
- g. A description of any actions taken in response to the complaint investigation.

#### **8.6. Retention of Records**

Unless otherwise specified, the permittee 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 permittee 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)]

### **9.0 REPORTING REQUIREMENTS**

#### **9.1. Initial Notification and Notification of Compliance Status (NESHAP HHHHHH)**

The permittee 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 assignment to this permit; 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 assignment to this permit, whichever is later.
- c. The notifications required by Conditions 9.1.a and 9.1.b must be sent to the LRAPA address as identified in Condition 10.2.

#### **9.2. Annual Report**

For each year this permit is in effect, the permittee 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 permit 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 permittee during the year; and [34-016(1)&(2)]
- h. If the permittee has exceeded the presumed compliance threshold in Condition 7.3.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)]

### **9.3. Notice of Change of Ownership or Company Name**

The permittee must notify LRAPA in writing using a LRAPA "Permit Application Form" within 60 days after any of the following: [LRAPA 37-0030(4)]

- a. Legal change of the name of the company as registered with the Corporation Division of the State of Oregon; or
- b. Sale or exchange of the activity or facility.

### **9.4. Construction or Modification Notices**

The permittee must notify LRAPA in writing using a LRAPA "Notice of Construction Form," or "Permit Application 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)]

### **9.5. Where to Send Reports and Notices**

Reports, with the permit number prominently displayed, must be sent to the LRAPA address as identified in Condition 10.2.

## **10.0 ADMINISTRATIVE REQUIREMENTS**

### **10.1. Reassignment to the General ACDP**

A permittee that wishes to continue assignment to this General ACDP must submit to LRAPA an application for reassignment as follows:

- a. The application must be received by LRAPA within 30 days prior to the expiration date listed on this permit. [LRAPA 37-0040(2)(c)]
- b. If a complete application for reassignment to the General permit is received in a timely

manner, the permit will not be deemed to expire until final action has been taken on the application. [LRAPA 37-0082(1)(b)]

- c. 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 LRAPA takes final action on the Simple or Standard ACDP application.

## **10.2. 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

## **10.3. LRAPA's Website**

Information about air quality permits and the LRAPA's regulations may be obtained from the LRAPA web page at [www.lrapa.org](http://www.lrapa.org).

## **11.0 FEES**

### **11.1. Annual Compliance Fee**

The annual fees specified in LRAPA section 37-8020, Table 2 for a General ACDP are due on or by **December 1** of each year this permit is in effect. 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.

### **11.2. Change of Ownership or Company Name Fee**

The Non-Technical Permit Modification specific activity fee specified in LRAPA section 37-0020, Table 2, Part 3.a. is due with an application for changing the ownership or the name of the company for a source assigned to this permit. Forms that require fees must be sent together to the LRAPA address as identified in Condition 10.2.

### **11.3. Where to Submit Fees**

Fees, with a permit number prominently displayed, must be sent to the LRAPA address as identified in Condition 10.2.

## **12.0 GENERAL CONDITIONS AND DISCLAIMERS**

### **12.1. Other Regulations**

In addition to the specific requirements listed in this permit, the permittee must comply with all other applicable legal requirements enforceable by LRAPA. [ORS 468A.060 and LRAPA 12-001(2)]

### **12.2. Conflicting Conditions**

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

**12.3. Masking of Emissions**

The permittee 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]

**12.4. LRAPA Access**

The permittee 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 permit in accordance with LRAPA section 13-020. [ORS 468.095(1) and LRAPA 13-020(1)(h)]

**12.5. Permit Availability**

The permittee must have a copy of the permit available at the facility at all times. [LRAPA 37-0020(3)]

**12.6. Outdoor Burning**

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

**12.7. Asbestos**

The permittee 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.

**12.8. Property Rights**

The issuance of this permit 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.

**12.9. Termination, Revocation, Rescission, or Modification**

LRAPA may modify or revoke this permit pursuant to LRAPA sections 37-0082 and 37-0084.

**13.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS**

**13.1. Abbreviations and Acronyms**

ACDP	Air Contaminant Discharge Permit	AQGP	Air Quality General Permit
ASHRAE	American Society of Heating, Refrigerating, and Air-Conditioning Engineers	AQMA calendar year	Air Quality Maintenance Area The 12-month period beginning January 1st and



	ending December 31st	Mn	Manganese
CAO	Cleaner Air Oregon	SDS	safety data sheet
Cd	Cadmium	NESHAP	National Emissions Standards for Hazardous Air Pollutants
CFR	Code of Federal Regulations		
Cr	Chromium	Ni	Nickel
DEQ	Oregon Department of Environmental Quality	OAR	Oregon Administrative Rules
		ORS	Oregon Revised Statutes
EPA	US Environmental Protection Agency	Pb	lead
		PSEL	Plant Site Emission Limit
HAP	Hazardous Air Pollutant as defined LRAPA title 44	SIC	Standard Industrial Code
HVLP	high velocity low pressure	target HAP	chromium, manganese, lead, nickel, cadmium
LRAPA	Lane Regional Air Protection Agency	VOC	volatile organic compound
MeCl	Methylene chloride	year	A period consisting of any 12- consecutive calendar months
metal HAP	chromium, manganese, lead, nickel, cadmium		

**13.2. 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]

**13.3. Calculating Chromium Use**

The permittee 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: [LRAPA 37-0069(1) and 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.

Permittees 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 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.

*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
<b>Calculation</b>	
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
<b>Total chromium 11.17 lbs = 2.62 lbs + 8.55 lbs</b>	



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 (SO<sub>2</sub>) and nitrogen oxides (NO<sub>x</sub>) emissions. The sources assigned to this General Permit are de minimis sources of particulate matter (PM), PM<sub>10</sub> (particulate matter no greater than 10 microns), and PM<sub>2.5</sub> (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 authorized by LRAPA Rules and Regulations and are part of the State Implementation Plan. As part of the General ACDP issuance process under LRAPA title 31, the public was provided at least 30 days to submit written comments. There were no comments received during the public comment period.

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.

AQGP-027r 6H Surface Coating Permit General ACDP RevRept  
JJW 10/12/2021;rr