

BASIC
AIR CONTAMINANT DISCHARGE PERMIT

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

This permit is being issued in accordance with the provisions of LRAPA's Rules and Regulations and based on the land use compatibility findings included in the permit record.

ISSUED TO:

Pratt's Auto, Inc.
4208 West 6th Ave
Eugene, Or 97402

INFORMATION RELIED UPON:

Application No.: 56787
Date Received: November 9, 2011


PLANT SITE LOCATION:

4208 West 6th Ave
Eugene, Or 97402

**LAND USE COMPATIBILITY
STATEMENT:**

Approving Authority: City of Eugene
Approval Date: August 26, 2011

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY



Merlyn L. Hough, Director

NOV 29 2011

Dated

Source(s) Permitted to Discharge Air Contaminants (LRAPA Section 37-0020):

| Table 1 Code | Source Description | SIC |
|--------------|--|------|
| Part A, 11 | Spray coating of motor vehicles, mobile equipment, or metal and/or plastic parts or products subject to 40 CFR Part 63, Subpart HHHHHH, as adopted under LRAPA Title 44, using less than 20 gallons of coating per year. | 7532 |

1.0 PERMIT ASSIGNMENT

- 1.1. Qualifications** All of the following conditions must be met in order to qualify to be issued this Basic Air Contaminant Discharge Permit (ACDP):
- a. The permittee is performing spray application of coatings that contain target HAP (compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd)) to motor vehicles, mobile equipment, or metal and/or plastic parts or products.
 - b. A General, Simple or Standard ACDP is not required for the source.
 - c. 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 removal activities:
- a. Spray coating applications that meet the definition of facility maintenance or space vehicle in 40 CFR 63.11180
 - b. Surface coating or paint stripping performed on site at installations owned or operated by the US Armed Forces (including the Coast Guard and the National Guard of any such State), the National Aeronautics and Space Administration, or the National Nuclear Security Administration
 - c. Surface coating or paint stripping of military munitions, as defined in 40 CFR 63.11180, manufactured by or for the US Armed Forces (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.
 - d. 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 and 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 that pertain to motor vehicle and mobile equipment surface coating regardless of whether compensation is received.
 - e. Surface coating meeting the definition of “research and laboratory activities” in 40 CFR 63.1180.

- f. Surface coating meeting the definition “quality control activities” in 40 CFR 63.1180.
- g. Surface coating covered under another area source NESHAP.

1.3. Permitted Activities

This permit allows the permittee to discharge air contaminants from processes and activities related to the air contaminant source(s) listed on the first page of this permit until this permit expires, is modified, revoked or rescinded as long as conditions of this permit are complied with. If there are other emissions activities occurring at the site besides those listed on the cover page of this permit, the permittee may be required to obtain a Simple or Standard Permit or General ACDP, if applicable.

1.4. 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. Fugitive Emissions

The permittee must take reasonable precautions to prevent fugitive dust emissions by:

- a. Treating vehicular traffic areas of the plant site under the control of the permittee.
- b. Operating all air contaminant-generating processes so that fugitive type dust associated with the operation will be adequately controlled at all times.
- c. Storing collected materials from air pollution control equipment in a covered container or other method equally effective in preventing the material from becoming airborne during storage and transfer.

2.2. 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 will verify that the deposition exists and will notify the permittee that the deposition must be controlled.

2.3. Nuisance and

The permittee must not allow the emission of odorous or other

Odors fugitive emissions so as to create nuisance conditions off the permittee's property. Nuisance conditions will be verified by LRAPA personnel.

3.0 COATING OPERATION AND MAINTENANCE

- 3.1. Compliance date** An existing affected source must achieve compliance no later than January 10, 2011. A new affected source must achieve compliance no later than January 9, 2008 or upon initial startup, whichever is later.
- 3.2. Spray application** The spray application of surface coatings is prohibited by persons who are not certified, by the deadlines in Condition 4.2, to have completed the training described in Condition 4.1. This does not apply to the students of an accredited surface coating training program who are under the direct supervision of an instructor.
- 3.3. Spray booth or enclosure** All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the following requirements in Condition 3.3.a and either Condition 3.3.b or 3.3.c:
- a. All spray booths, preparation stations, or mobile enclosures must be fitted with filters demonstrated to achieve at least 98% capture of paint overspray. The procedure to demonstrate filter efficiency must be consistent with ASHRAE Method 52.1 and 40 CFR 63.1173(e)(2)(i). The permittee may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement. This requirement does not apply to waterwash spray booths that are operated and maintained according to the manufacturer's specifications.
 - b. All spray booths and preparation stations 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.
 - c. 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.

- 3.4. Spray equipment** All spray-applied coatings must be applied as follows:
- a. With a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, or air-assisted airless spray gun.
 - b. With an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed in Condition 3.4.a for a comparable operation, and for which written approval has been obtained from the EPA Administrator.
 - c. The spray-equipment requirement does not apply to the following:
 - i. 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;
 - ii. The application of coatings on aerospace vehicles that contain fillers that adversely affect atomization with HVLP spray guns; or
 - iii. 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. Examples of acceptable spray gun cleaning methods include:
- a. Hand cleaning of the disassembled gun in a container of solvent;
 - b. Flushing solvent through the gun without atomizing the solvent and paint residue;
 - c. Using a fully enclosed spray gun washer; or
 - d. A combination of non-atomized methods.

4.0 TRAINING REQUIREMENTS

- 4.1. Operator Training** The permittee must ensure and certify that all 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. The training program must include, at a minimum, the following:

- a. A list of all current personnel by name and job description who are required to be trained;
- b. Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the following topics:
 - i. Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and 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.
 - 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.

4.2. Operator Training Deadlines

All new and existing personnel who spray apply surface coatings, as defined in 40 CFR 63.11180, must be trained by 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.

- a. For an existing source (in existence prior to September 17, 2007), training and certification must be completed by January 10, 2011 or no later than 180 days after hiring, whichever is later.
- b. For a new source, all personnel must be trained and certified no later than July 7, 2008 or no later than 180

days after hiring, whichever is later.

- c. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in Condition 4.1.b, satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.
- d. If it can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in Condition 4.1.b, the permittee is not required to provide the initial training to these painters.

**4.3. Operator
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 personnel receive refresher training and be certified every five years in accordance with the requirements in Condition 4.1.

5.0 PAINT STRIPPING OPERATIONS

5.1. Applicability

This section applies only to facilities that use methylene chloride (MeCl) to strip dried paint from any surface.

5.2. Compliance Date

An existing affected source must achieve compliance no later than January 10, 2011. A new affected source must achieve compliance no later than January 9, 2008 or upon initial startup, whichever is later.

**5.3. Management
Practices**

The permittee must implement management practices to minimize evaporative emissions of MeCl. The management practices must address, at a minimum, the following practices, as applicable:

- a. Evaluate each application to ensure there is a need for paint stripping (e.g., evaluate whether it is possible to re-coat the piece without removing the existing coating).
- b. Evaluate each application to ensure that there is no alternative paint stripping technology that can be used.
- c. Reduce exposure of all paint strippers containing MeCl to the air.
- d. Optimize application conditions when using paint strippers containing MeCl to reduce MeCl evaporation (e.g., if the stripper must be heated, make sure that the temperature is kept as low as possible to reduce evaporation).
- e. Practice proper storage and disposal of paint strippers

containing MeCl (e.g., store stripper in closed, airtight containers).

- 5.4. Minimization Plan** For each paint stripping operation that uses more than one ton of MeCl per year, the permittee must develop and implement a written MeCl minimization plan. At a minimum, the plan must address each item in Condition 5.3, as applicable, to the operation. The plan must be kept on site and be made available upon request.
- 5.5. Signage** For each paint stripping operation that uses more than one ton of MeCl per year, the permittee must post a sign or placard outlining the minimization plan in each area where paint stripping operations occur.

6.0 RECORDKEEPING REQUIREMENTS

- 6.1. General** The permittee must maintain the following:
- 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.
 - c. Records of any deviation from the requirements in this permit. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation.
- 6.2. Coating Operations** The permittee must maintain the following records related to surface coating operations:
- a. The permittee must maintain records of annual coating and solvent usage, as applicable including the VOC and HAP content of each coating and solvent used.
 - b. 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.
 - c. Documentation of the filter efficiency of any spray booth exhaust filter material as specified in Condition 3.3.
 - d. Dates the filters used to comply with Condition 3.3 were replaced. This may be part of the daily log.
 - e. Documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to or greater than 3.0 fluid ounces (89 cc) that does not meet the definition of an

HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined by EPA to achieve a transfer efficiency equivalent to that of an HVLP spray gun, in accordance with Condition 3.4.

6.3. Stripping Operations

The permittee must maintain the following records related to paint stripping:

- a. Information about each MeCl containing paint stripper used at the facility, including the MeCl content of the stripper and the amount of the stripper used per year, in gallons.
- b. MSDS or other documentation provided by the supplier or manufacturer or engineering calculations are sufficient to document the paint stripper MeCl content.
- c. Purchase receipts or itemized invoices are sufficient to document paint stripper usage.
- d. For a paint stripping operation that annually uses more than one ton of MeCl, the permittee is required to maintain a record of the current MeCl minimization plan on site for the duration of the paint stripping operations. The permittee must also keep records of the annual review of, and updates to, the MeCl minimization plan.

6.4. Complaint Log

The permittee must maintain a log of all written complaints and complaints received via telephone that specifically refer to air pollution concerns associated to the permitted facility. The log must include a record of the permittee's actions to investigate the validity of each complaint and a record of actions taken for complaint resolution.

6.5. Retention of Records

Unless otherwise specified, all records must be maintained for a period of 5 years. The permittee must hold the records on site for a period of 2 years and make them available to LRAPA upon request.

7.0 REPORTING REQUIREMENTS

7.1. Initial Notification

The permittee must submit an initial notification in accordance with 40 CFR 63.11175(a). A form for this purpose is available from LRAPA. The notification must be sent to the LRAPA office.

- a. For painting/stripping operations existing on July 7, 2008, this notification must be submitted not later than January 11, 2010.

- b. For sources constructed/installed after July 7, 2008, this notification must be submitted within 180 days of initial start-up of the painting/stripping operation.

7.2. Notification of Compliance Status

The permittee must submit a notification of compliance status in accordance with 40 CFR 63.11175(b). A form for this purpose is available from LRAPA. The notification must be sent to the LRAPA address.

- a. For painting/stripping operations existing on July 7, 2008, this notification must be submitted not later than March 11, 2011.
- b. For sources constructed/installed after July 7, 2008, this notification must be submitted within 180 days of initial start-up of the painting/stripping operation.
- c. For a paint stripping operation for which a written MeCl minimization plan has not been developed in accordance with Condition 5.4, the permittee must submit a new notification of compliance status by March 1 of the year following a year in which more than one ton of MeCl is used.

7.3. Annual Report

For each year this permit is in effect, the permittee must submit to LRAPA by **February 15** two (2) copies of the following information for the previous calendar year:

- a. The company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.
- b. The name, title, address, telephone, e-mail address (if available) and signature of the certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this permit or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance.
- c. For each spray-applied coating that contains a metal HAP, the metal HAP content and amount used, in gallons.
- d. For each paint stripper used that contains MeCl, the MeCl content and amount used, in gallons.
- e. Summary of complaints relating to air quality received by permittee during the year.
- f. Annual VOC and HAP containing coating and solvent

usage.

- 7.4. 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 the following:
- a. Legal change of the name of the company as registered with the Corporations Division of the State of Oregon; or
 - b. Sale or exchange of the activity or facility.
- 7.5. 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:
- a. Installing new paint stripping or surface coating equipment. This does not include enclosed spray gun cleaners, paint stripping equipment to reduce MeCl emissions, or purchasing new spray guns to comply with this permit at an existing source;
 - b. Making a physical change(s) to existing paint stripping or surface coating equipment which increases air emissions. This does not include routine maintenance, such as filter replacement.
- 7.6. Where to Send Reports and Notices** The reports, with the permit number prominently displayed, must be sent to the LRAPA address.

8.0 ADMINISTRATIVE REQUIREMENTS

- 8.1. Permit Renewal Application** A complete renewal application is due within 60 days prior to the expiration date listed on this permit.

9.0 FEES

- 9.1. Annual Compliance Fee** The annual fee specified in LRAPA 37-0020, Table 2, Part 2 for a Basic ACDP is due on **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 this date.
- 9.2. Where to Submit Fees** Fees must be submitted to:
- Lane Regional Air Protection Agency
1010 Main Street
Springfield, Oregon 97477

10.0 GENERAL CONDITIONS AND DISCLAIMERS

- 10.1. Other Regulations** In addition to the specific requirements listed in this permit, the permittee must comply with all other legal requirements enforceable by LRAPA.
- 10.2. Conflicting Conditions** In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply.
- 10.3. 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.
- 10.4. 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 ORS 468-095.
- 10.5. Permit Availability** The permittee must have a copy of the permit available at the facility at all times.
- 10.6. Open Burning** The permittee may not conduct any open burning except as allowed by LRAPA Title 47.
- 10.7. Asbestos** The permittee must comply with the asbestos abatement requirements in LRAPA Title 43 for all activities involving asbestos-containing materials, including, but not limit to, demolition, renovation, repair, construction, and maintenance.
- 10.8. 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.
- 10.9. Termination, Revocation, or Modification** LRAPA may modify or revoke this permit pursuant to LRAPA 37-0082 and 37-0084.

11.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

| | | | |
|------|----------------------------------|--------|--|
| ACDP | Air Contaminant Discharge Permit | ASHRAE | American Society of Heating, Refrigerating, and Air- |
|------|----------------------------------|--------|--|

| | | | |
|---------------|--|------------|---|
| | Conditioning Engineers | | nickel, cadmium |
| calendar year | The 12-month period beginning January 1st and ending December 31st | Mn | Manganese |
| Cd | Cadmium | MSDS | material safety data sheet |
| CFR | Code of Federal Regulations | NESHAP | National Emissions Standards for Hazardous Air Pollutants |
| Cr | Chromium | Ni | Nickel |
| DEQ | Oregon Department of Environmental Quality | OAR | Oregon Administrative Rules |
| EPA | US Environmental Protection Agency | ORS | Oregon Revised Statutes |
| HAP | Hazardous Air Pollutant as defined LRAPA Title 44 | Pb | lead |
| LRAPA | Lane Regional Air Protection Agency | SIC | Standard Industrial Code |
| MeCl | Methylene chloride | target HAP | chromium, manganese, lead, nickel, cadmium |
| metal HAP | chromium, manganese, lead, | year | A period consisting of any 12-consecutive calendar months |

jce: 06/22/2010
 AQBP-027 Basic 6H surface coating permit basic acdp.docx
 max 11/23/2011

Lane Regional Air Protection Agency

**BASIC
AIR CONTAMINANT DISCHARGE PERMIT
REVIEW REPORT**

Pratt's Autobody and Painting
4208 West 6th Ave.
Eugene, OR 97402
(541) 344-5540

| Reports | | | NESHAP | Size | Public Notice |
|---------|-------------|------------------|--------|-------|---------------|
| Annual | Semi-annual | Excess Emissions | | | |
| 2/15 | | | 6H | Basic | Category 1 |

1. The proposed permit is a new permit for a new source.
2. The permittee operates a motor vehicle surface coating operation subject to the National Emission Standard for Hazardous Air Pollutants and using less than 20 gallons/year of total coatings.
3. This facility qualifies for a Basic ACDP because the source will use less than 20 gallons/year of spray-applied coatings.
4. The source is located in an attainment area for PM, PM_{2.5}, NO_x, SO₂ and VOC, a maintenance area for CO, and a nonattainment area for PM₁₀. The source is located within 10 kilometers of the Three Sisters Class I Air Quality Protection Area but the emissions are less than the significant emissions rate.
5. LRAPA has determined that sources that qualify for a Basic ACDP will not have significant emissions. In most cases the emission will not exceed 5 tons of PM or PM₁₀ or 10 tons of any other pollutant. Therefore, the Basic ACDP does not include Plant Site Emission Limits and it is not necessary to estimate emissions for each individual source.
6. Pursuant to LRAPA Section 37-0056(4), issuance of a new or renewed Basic Air Contaminant Discharge Permit requires public notice in accordance with LRAPA Section 31-0030(3)(a). Therefore, there will be no prior notice or public participation. However, LRAPA will maintain a list of all permit actions processed under Category I and make the list available for public review.

Max 11/28/2011