



October 6, 2015

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

Re: Addendum No. 1 to Motor vehicle surface coating registration as an alternative to permitting to add an adjacent location (2380 Main St to the existing permitted address 2325 Main St) in accordance with LRAPA 34-030-6.

Source Number 208296
Todd's Auto Body, Inc.
2325 and 2380 Main St., Springfield, OR 97477

Dear Mr. Fortier,

Based upon your application (received November 25, 2014, and Non-technical permit modification application received October 2, 2015) you are conditionally registered under LRAPA 34-025. In order to maintain your registration, you must keep records demonstrating you comply with all applicable state and federal rules and regulations, and the Ecobiz certification you indicated on your application. These requirements are detailed in the attached document.

In addition to the annual reporting requirements detailed in section 6.0 of the attached document, you also must reaffirm in writing by February 15th of each year that you are continuing to comply with all registration requirements. Please keep a record of this registration on site for as long as you perform motor vehicle surface coating operations, or until you obtain an air quality permit.

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 34-025 and the conditions of registration listed in the attachment. Nothing in this registration limits the ability of LRAPA to pursue enforcement action. LRAPA will inspect your facility at some time 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 John Morrissey or Max Hueftle at 541-736-1056.

Sincerely,

Max Hueftle

Permit Section Manager
Lane Regional Air Protection Agency

1.0 COATING OPERATION AND MAINTENANCE

- 1.1. 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.
- 1.2. Spray application** The spray application of surface coatings is prohibited by persons who are not certified, by the deadlines in Condition 2.2, to have completed the training described in Condition 2.1. This does not apply to the students of an accredited surface coating training program who are under the direct supervision of an instructor.
- 1.3. 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:
- 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 registered source 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.
- 1.4. 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 1.4.a for a comparable operation, and for which written approval has been obtained from the EPA Administrator.

1.5. Spray Gun Cleaning

All paint spray gun cleaning must be done as follows:

- a. 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.
- b. Examples of acceptable spray gun cleaning methods include: hand cleaning of the disassembled gun in a container of solvent; flushing solvent through the gun without atomizing the solvent and paint residue; or using a fully enclosed spray gun washer.
- c. A combination of non-atomized methods may also be used.

2.0 TRAINING REQUIREMENTS

2.1. Operator Training

The registered source 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.

2.2. 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 2.1.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 2.1.b, the registered source is not required to provide the initial training to these painters.

2.3. Operator Refresher Training

Training and certification will be valid for a period not to exceed five years after the date training is completed. The registered source must ensure that all personnel receive refresher training and be certified every five years in accordance with the requirements in Condition 2.1.

3.0 PAINT STRIPPING OPERATIONS

- 3.1. Applicability** This section applies only to facilities that use methylene chloride (MeCl) to strip dried paint from any surface.
- 3.2. Management Practices** The registered source 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).
- 3.3. Minimization Plan** For each paint stripping operation that uses more than one ton of MeCl per year, the registered source must develop and implement a written MeCl minimization plan. At a minimum, the plan must address each item in Condition 3.2, as applicable, to the operation. The plan must be kept on site and be made available upon request.
- 3.4. Signage** For each paint stripping operation that uses more than one ton of MeCl per year, the registered source must post a sign or placard outlining the minimization plan in each area where paint stripping operations occur.

4.0 PLANT SITE EMISSION LIMITS

- 4.1. Plant Site Emission Limits (PSEL)** Plant site emissions must not exceed the following. These PSELs are not in addition to the PSELs in the source's General ACDP and other General ACDP Attachments.:

Pollutant	Limit	Units
VOC	39	Tons/year

Single HAP	9	Tons/year
Combined HAPs	24	Tons/year

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

4.3. VOC and HAP PSEL Compliance Monitoring for Surface Coating Operations 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.

- a. Facilities will be presumed to be in compliance with the yearly VOC and HAP PSELs provided:
 - i. Total VOC or HAP containing coating and solvent consumption does not exceed 2,500 gallons during any 12-consecutive calendar month period.
- b. If the registered source exceeds the total VOC or HAP containing coating and solvent consumption stated above, the source must demonstrate compliance with the yearly VOC or HAP PSEL on a monthly basis as follows:

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

where,

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

C = Material usage for the period in gallons;

K = VOC or HAP content of the material (lb/lb);

X = Subscript X represents a specific material.

5.0 RECORDKEEPING REQUIREMENTS

5.1. General The registered source 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.

5.2. Coating Operations

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

- a. 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.
- b. Documentation of the filter efficiency of any spray booth exhaust filter material as specified in Condition 1.3.
- c. Dates the filters used to comply with Condition 1.3 were replaced. This may be part of the daily log.
- d. 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 1.4.

5.3. Stripping Operations

The registered source 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 registered source is required to maintain a record of the current MeCl minimization plan on site for the duration of the paint stripping operations. The registered source must also keep records of the annual review of, and updates to, the MeCl minimization plan.

5.4. Emissions

The registered source must maintain records of annual emissions and/or annual coating and solvent usage, as applicable (see Condition 4.3), including the VOC and HAP content of each coating and solvent used.

6.0 REPORTING REQUIREMENTS

- 6.1. Initial Notification** The registered source 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 appropriate LRAPA office address.
- 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.
- 6.2. Notification of Compliance Status** The registered source 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, as listed in Condition 7.2.
- 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 3.3, the registered source 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.
- 6.3. Annual Report** For each year this permit is in effect, the registered source 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 registered source during the year.
- f. Re-registration information required by 7.1

7.0 ADMINISTRATIVE REQUIREMENTS

- 7.1. **Re-registration**
 - a. In order to maintain registration, reaffirm in writing, by **February 15th** of each year, the facility's annual report (see 6.3) that the facility remains qualified for registration.
 - b. Report any change in any of the factual data reported in the source's application (as required under LRAPA 34-030-3 or 4), at which time re-registration may be required on forms furnished by LRAPA.
 - 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.

- 7.2. **LRAPA Coordinator Address**

All reports, notices, and applications should be directed to LRAPA as follows:
 Lane Regional Air Protection Agency
 1010 Main Street
 Springfield, OR 97477
 541-736-1056

- 7.3. **LRAPA's web site**

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

8.0 FEES

- 8.1. **Annual Registration Fee**

The annual fee specified in LRAPA 37-0020, Table 2, Part 5 for a motor vehicle surface coating operation 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 approximately 60 days prior to this date.

9.0 GENERAL REQUIREMENTS AND DISCLAIMERS

- 9.1. Other Regulations** In addition to the specific registration requirements, comply with all other legal requirements enforceable by LRAPA.
- 9.2. Conflicting Requirements** In any instance in which there is an apparent conflict relative to specific registration requirements, the most stringent conditions apply.
- 9.3. Masking of Emissions** Do 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.
- 9.4. LRAPA Access** 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 registration in accordance with ORS 468-095.
- 9.5. Open Burning** Do not conduct any open burning except as allowed by LRAPA Title 47.
- 9.6. Asbestos** 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.

10.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

ACDP	Air Contaminant Discharge Permit
ASHRAE	American Society of Heating, Refrigerating, and Air-Conditioning Engineers
calendar year	The 12-month period beginning January 1st and ending December 31st
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
LRAPA	Lane Regional Air Protection Agency
Mn	Manganese
MeCl	Methylene chloride
metal HAP	chromium, manganese, lead, nickel, cadmium
MSDS	material safety data sheet
NESHAP	National Emissions Standards for Hazardous Air Pollutants
Ni	Nickel
OAR	Oregon Administrative Rules
ORS	Oregon Revised Statutes
Pb	lead
SIC	Standard Industrial Code
target HAP	chromium, manganese, lead, nickel, cadmium

Max 10/18/11