



Northwest Clean Air Agency

DRAFT General Order of Approval GO 002R1 Automotive Refinishing Facilities with a Spray Booth

Effective xxx 2019

Except as noted below, this General Order is applicable to any source applying for coverage within the jurisdiction of the Northwest Clean Air Agency (Island, Skagit, and Whatcom Counties, excluding tribal lands).

Pursuant to the state of Washington Clean Air Act Chapter 70.94 Revised Code of Washington (RCW) and the Northwest Clean Air Agency (NWCAA) Regulation, the NWCAA finds:

FINDINGS

1. Any automotive refinishing facility that includes a new or modified paint spray booth and its associated preparation station proposing to operate within the jurisdiction of the NWCAA (Island, Skagit, or Whatcom counties) may apply for coverage under this General Order. This Order and the NWCAA letter granting coverage is applicable to a single spray booth at an automotive refinishing facility. Subsequent applications for coverage for additional spray booths at the same facility may be granted if the applications are submitted more than 18 months apart, and are not part of the same capital project.
2. An automotive refinishing facility may not obtain coverage under this Order if it is part of a source subject to Section 322 - Air Operating Permit Program of the NWCAA Regulation.
3. To apply for coverage under this General Order, submit a complete application. The application is available on the NWCAA website at www.nwcleanairwa.gov, or from the NWCAA office located at 1600 South Second Street, Mount Vernon, WA 98273. Please call the office at (360) 428-1617 for assistance obtaining or completing the application.
4. Coverage under this General Order is effective thirty (30) days after the NWCAA receives a complete application. Within 30 days of submittal, the NWCAA will either deem the application complete and issue a letter granting coverage, or deem the application incomplete and notify the applicant of the information needed to make the application complete, or determine that the General Order does not apply to the proposed project. The agency will notify the applicant in writing of the reason that the General Order does not apply.
5. This General Order and the basis for its determination will be reviewed at least once every five years following issuance. If changes are required, the General Order will be revised and an updated General Order issued. Facilities that have been granted coverage under this General Order are not required to comply with subsequent versions of the Order.

Note that in addition to other applicable rules and regulations, the spray booth and its associated preparation station are subject to applicable portions of the following regulations:

Northwest Clean Air Agency Regulation

- Section 508 – Spray Coating Operations

National Emission Standards for Hazardous Air Pollutants (NESHAP)/Maximum Achievable Control Technology Standards (MACT)

- 40 CFR 63 Subpart A – General Provisions
- 40 CFR 63 Subpart HHHHHH - National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

THEREFORE, IT IS ORDERED that a spray booth and associated preparation station at an automotive refinishing facility constructed and operated in accordance with the Application for Coverage, this General Order and the associated Technical Support Document dated xxxx, 2019, is hereby approved subject to the following restrictions and conditions¹.

APPROVAL CONDITIONS

- (1) Spray coating operations must be conducted in an enclosure that is comprised of at least 3 sides and a ceiling that captures and exhausts all overspray through spray booth exhaust filters installed and operated in accordance with the conditions of this Order.
- (2) Each enclosure in which spray coating takes place must be equipped with an unobstructed stack that exhausts vertically and discharges at least 6 feet above the highest point on the building roof.
- (3) Spray coating operations must be conducted using high volume-low pressure (HVLP), electrostatic, or equivalent transfer efficiency spray guns.
- (4) Coatings and solvents used must not contain cadmium, lead, hexavalent chromium (chromates) or manganese.
- (5) Coatings used must not contain ethylbenzene at a concentration greater than 3.6% by weight.
- (6) Demonstrate compliance with Conditions 4 and 5 of this Order by keeping a copy of the product manufacturer's specification sheet that identifies the chemicals contained in each coating and solvent used in the spray booth or associated preparation station.
- (7) The total quantity of coatings and solvents used in the spray booth and associated preparation station must not exceed 490 gallons in any consecutive 12-month period.
Maintain a record of the total quantity of coatings and solvents used in the spray booth on a calendar month, and on a consecutive 12-month rolling basis.
The owner/operator must submit a written notice to the NWCAA within 30 days of exceeding the 490 gallon limit established in this condition.
- (8) Each enclosure in which spray coating takes place must be equipped with exhaust filters that have a capture efficiency of 98% or greater as determined by American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method

52.1, Method 52.2, or an alternate test method approved by the NWCAA in writing. Published filter efficiency data provided by filter vendors may be used to demonstrate compliance with this requirement.

Filter purchase records must be kept that indicate compliance with this condition.

- (9) Each enclosure in which spray coating takes place must be equipped with a gauge (manometer or magnehelic) to measure the pressure drop across the exhaust filters. Within 30 days after initial start of the spray booth, the acceptable pressure drop range shall be clearly marked on or near the gauge. The minimum pressure drop shall not be less than the pressure drop measured with clean, properly installed filters.
- (10) At the start of each operating day, each enclosure in which spray coating takes place must be inspected for the following items, and in the following order.
 - (A) The exhaust filters are properly seated and completely cover the exhaust plenum with no visible gaps.
 - (B) The pressure drop gauge is working properly.
 - (C) The pressure drop across the exhaust filters is within the acceptable range.

The results of each inspection required by this condition must be maintained in a written log. The log shall be updated immediately after completing each inspection and prior to starting spray coating operations. If any problems listed in this condition are identified, discontinue spray coating operations until action has been completed to correct the problem. The written log shall include a description of each corrective action taken. The written log shall also include the date and time of each exhaust filter change out. Each log entry shall include the time and date, and initials of the person making the entry.

- (11) Spray guns must be cleaned in an enclosed cleaning device, or disassembled and cleaned in a container. Each gun cleaning device and container must be kept closed when not in use. Guns and spray equipment must not spray atomized solvent into the air.
- (12) Organic solvents used for cleanup of equipment as well as solvent soaked materials such as rags must be collected immediately after use and kept in closed containers.
- (13) Records required by this General Order must be kept on-site for at least 3 years from the date of generation and shall be readily available for review by the NWCAA.
- (14) The owner/operator shall provide written notification to the NWCAA within 15 days of the startup date of the spray booth covered under this General Order.

APPROVED BY:

Daniel A. Mahar, P.E.
Environmental Engineer
Northwest Clean Air Agency

Date

Agata McIntyre, P.E.
Engineering Manager
Northwest Clean Air Agency

Date

ⁱ Nothing in this permit is intended to, or shall, alter or waive any applicable law [including but not limited to defenses, entitlements, challenges or clarifications related to the Credible Evidence Rule, 62 FR 8315 (Feb. 27, 1997)] concerning the use of data for any purpose under the Act, generated by the reference method specified herein or otherwise.

Pursuant to Section 300.10 of the NWCAA Regulation and ch 43.21B RCW, this Order may be appealed to the Pollution Control Hearings Board (PCHB). To appeal to the PCHB, a written notice of appeal must be filed with the PCHB and a copy served upon the NWCAA within 30 days of the date the applicant receives this Order. Additional information regarding appeal procedures can be found at: www.eluho.wa.gov under Pollution Control Hearings Board.