



Northwest Clean Air Agency

General Order of Approval GO 005 for Spray Coating Operations

Effective __

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, San Juan, Skagit, and Whatcom Counties, excluding tribal lands).

Pursuant to the state of Washington Clean Air Act Chapter 70A.15 Revised Code of Washington (RCW) and the Northwest Clean Air Agency (NWCAA) Regulation, the NWCAA finds:

FINDINGS

1. This Order and the NWCAA letter granting coverage apply to a single spray enclosure (comprised of a spray booth and its associated preparation station) at a facility conducting spray coating. Subsequent applications for coverage for an additional spray enclosure 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.
 - 1.1. Ineligible facilities:
 - 1.1.1. Spray coating facilities subject to Section 322 - Air Operating Permit Program of the NWCAA Regulation.
 - 1.1.2. Facilities that are subject to 40 CFR 63 Subpart HHHHHH.
 - 1.1.3. Facilities that are subject to 40 CFR 63 Subpart XXXXXX.
 - 1.1.4. Facilities that spray polyurea/polyurethane coatings or gelcoats/resins.
 - 1.1.5. Facilities that use products containing more than 3.6% (by weight) ethylbenzene.
 - 1.1.6. Facilities that use products containing naphthalene, diethanolamine, or compounds of chromium, lead, manganese, nickel, or cadmium.
2. Coverage under this General Order is effective thirty (30) days after the NWCAA receives a complete application, including the application fee, unless NWCAA notifies the applicant that coverage is denied. Within 30 days of submittal, the NWCAA will:
 - 2.1. Deem the application complete and issue a letter granting coverage; or
 - 2.2. Deem the application incomplete and notify the applicant of the information needed to make it complete; or
 - 2.3. Determine that the proposed project is ineligible for the General Order and notify the applicant in writing.

3. 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 updated. Facilities that have been granted coverage under this General Order or a previous 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 enclosure is subject to applicable portions of the following regulations:

Northwest Clean Air Agency Regulation

- Section 508 – Spray Coating Operations

THEREFORE, IT IS ORDERED that a spray enclosure at a facility conducting spray coating be constructed and operated in accordance with the Application for Coverage, this General Order and the associated Technical Support Document dated [REDACTED], is hereby approved subject to the following restrictions and conditions¹.

APPROVAL CONDITIONS

- (1) Spray coating operations as defined in NWCAA Section 508 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 enclosure 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) Products used must not contain naphthalene, diethanolamine, or compounds of chromium, lead, manganese, nickel, or cadmium.
- (5) Products used must not contain ethylbenzene at a concentration greater than 3.6% by weight.

¹ 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.

- (6) Demonstrate compliance with Conditions 4 and 5 of this Order by keeping copies of the product manufacturer's specification sheets that identify the chemicals contained in each product used.
- (7) Limit the total quantity of products used to 490 gallons in any consecutive 12-month period.
 - (A) Maintain a record of the total quantity of products used on a calendar month and on a consecutive 12-month rolling basis. *Note: All products must also be tracked and reported to NWCAA as part of the annual emissions inventory.*
 - (B) 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. MERV ratings alone are insufficient.
- (9) Each enclosure in which spray coating takes place must be equipped and operated with a gauge (manometer or magnahelic) to measure the pressure drop across the exhaust filters. The gauge must be readily accessible and visible. Within 30 days after initial start of the spray enclosure, 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. A minimum pressure drop of zero during operation is not acceptable as zero reflects a calibration value when the exhaust system is not operating.
- (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 (e.g., calibrated to zero before the enclosure exhaust is turned on).
 - (C) The pressure drop across the exhaust filters is within the acceptable range marked on or near the gauge.

Record the results of each inspection in a written log and include the date, time, and initials of person making the entry. Update the log 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. Record the action taken to correct the problem in the written log.
- (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 enclosure covered under this General Order.

APPROVED BY:

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Northwest Clean Air Agency

Date

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

Date