

**GENERAL**  
**AIR CONTAMINANT DISCHARGE PERMIT**

Department of Environmental Quality  
 Air Quality Division  
 811 SW Sixth Avenue  
 Portland, OR 97204-1390  
 Telephone: (503) 229-5359

This permit is issued in accordance with the provisions of ORS 468A.040 and OAR 340-216-0060

**ISSUED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY**

Signed copy on file at DEQ Headquarters Office

\_\_\_\_\_  
 Andy Ginsburg, Air Quality Division Administrator

\_\_\_\_\_  
 Dated

Table 1 Code	Source Description	NAICS
Part B, 59	Paint removal using methylene chloride, subject to 40 CFR part 63 subpart HHHHHH, as adopted under OAR 340-244-0220	211112, 311942, 321991, 322214, 325110, 325120, 325131, 325188, 325192, 325193, 325199, 325211, 325510, 325998, 326199, 32614, 32615, 326199, 326291, 326299, 331111, 33121, 331221, 331311, 331316, 331511, 331513, 331524, 332311, 332312, 332321, 332323, 33242, 332722, 332813, 332991, 33312, 333313, 333611, 334119, 33422, 336111, 336112, 33612, 336211, 336212, 336213, 336214, 336312, 33632, 33633, 33634, 33635, 33637, 336399, 336413, 336414, 336415, 33651, 336611, 336612, 3369, 336991, 336999, 337214, 339111, 339112, 33992, 33995, 339999, 441110, 441120, 482111, 54171, 56121, 56211, 562211, 562212, 562213, 562219, 562920, 713931, 8111, 811121, 81131, 811420

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## **1.0 PERMIT ASSIGNMENT**

- 1.1. Qualifications** All of the following conditions must be met in order to qualify for assignment to this General Air Contaminant Discharge Permit (ACDP):
- a. The permittee is performing paint stripping using methylene chloride 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. A 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. 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.
  - b. 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.
  - c. Paint stripping activities 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.
  - d. Paint stripping activities meeting the definition of “research and laboratory activities” in 40 CFR 63.1180.
  - e. Paint stripping activities meeting the definition “quality control activities” in 40 CFR 63.1180.
  - f. Paint stripping activities covered under another area source NESHAP.
- 1.3. Assignment** DEQ will assign qualifying permittees to this permit that have and maintain a good record of compliance with DEQ’s Air Quality regulations and that DEQ determines would be appropriately regulated by a General ACDP. DEQ may rescind assignment if the permittee no longer meets the requirements of this permit.

- 1.4. 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 ACDP or a General ACDP Attachment(s), if applicable.
- 1.5. Relation to local land use laws** This permit is not valid in 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 in Lane County, contact Lane Regional Air Pollution Authority for any necessary permits at (541) 736-1056. 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, as applicable:
- a. In Clackamas, Columbia, Multnomah, or Washington Counties, emissions from any air contaminant source must not equal or exceed 20% opacity for a period aggregating more than 30 seconds in any one hour.
  - b. In all other areas of the state, emissions from any air contaminant source must not equal or exceed 20% opacity for a period aggregating more than 3 minutes in any one hour.
- 2.2. Fugitive Emissions** The permittee must take reasonable precautions to prevent fugitive dust emissions, such as but not limited to:
- 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.

- 2.3. 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. DEQ will verify that the deposition exists and will notify the permittee that the deposition must be controlled.
- 2.4. Nuisance and Odors** The permittee must not allow the emission of odorous or other fugitive emissions so as to create nuisance conditions off the permittee's property. Nuisance conditions will be verified by DEQ personnel.

### **3.0 PAINT STRIPPING OPERATIONS**

- 3.1. Compliance date** An existing affected source must achieve compliance by January 10, 2011. A new affected source must achieve compliance by January 9, 2008 or upon initial startup, whichever is later.
- 3.2. 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, air-tight containers).
- 3.3. 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 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 permittee 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:
- | Pollutant     | Limit | Units         |
|---------------|-------|---------------|
| Single HAP    | 9     | tons per year |
| Combined HAPs | 24    | tons per 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 PSELs is determined for each 12-consecutive calendar month period based on the following calculation:
- $$E_{HAP} = [\sum(C_X * D_X * K_X) - W] \times 1 \text{ ton}/2000 \text{ lb.}$$
- where,
- $E_{HAP}$  = HAP emissions (tons/yr);
  - C = Material usage for the period in gallons;
  - D = Material density in pounds per gallon; if K is in units of lb/lb, otherwise D = 1.
  - K = HAP content of the material (lb/lb);
  - X = Subscript X represents a specific material;
  - W = Weight of HAP shipped offsite (lbs).

## 5.0 RECORDKEEPING REQUIREMENTS

- 5.1. **General** The permittee must maintain the following records:
- a. All notifications and reports submitted to the U.S. EPA and/or to DEQ.
  - 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. **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 MeCl content of the stripper and the amount of the stripper used per month and year, in gallons.

- b. MSDS, 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.

- 5.3. Emissions** The permittee must maintain records of annual emissions as calculated according to Conditions 4.3, including the supporting process parameter and emission factor information.
- 5.4. 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.
- 5.5. 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 DEQ upon request.

## **6.0 REPORTING REQUIREMENTS**

- 6.1. 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 DEQ. The notification must be sent to the appropriate DEQ office, as listed in Condition 7.2.
- a. For paint stripping operations existing on July 7, 2008, this notification must be submitted by January 11, 2010.
  - b. For paint stripping operations constructed/installed after July 7, 2008, this notification must be submitted within 180 days of initial start-up of the operation.
- 6.2. 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 DEQ. The notification must be sent to the appropriate DEQ office, as listed in Condition 7.2.
- a. For stripping operations existing on July 7, 2008, the notification must be submitted by March 11, 2011.

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

**6.3. Annual Report**

For each year this permit is in effect, the permittee must submit to DEQ 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 paint stripper used that contains MeCl, the MeCl content and amount used, in gallons.
- d. Annual emissions as calculated according to Conditions 4.3, including the supporting process parameter and emission factor information.
- e. Summary of complaints relating to air quality received by permittee during the year.

**6.4. Notice of Change of Ownership or Company Name**

The permittee must notify DEQ in writing using a DEQ "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.

**6.5. Construction or Modification Notices**

The permittee must notify DEQ in writing using a DEQ "Notice of Construction Form," or "Permit Application Form," and obtain approval in accordance with OAR 340-210-0205 through 340-210-0250 before:

- a. Constructing, installing, or establishing a new stationary source that will cause an increase in any regulated pollutant emissions;

- 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
- c. Constructing or modifying any air pollution control equipment.

**6.6. Where to Send Reports and Notices**

Except in Clackamas, Clatsop, Columbia, Multnomah, Tillamook, and Washington Counties, reports and notices, with the permit number prominently displayed, must be sent to the Permit Coordinator for the region where the source is located as identified in Condition 7.2. In Clackamas, Clatsop, Columbia, Multnomah, Tillamook, and Washington Counties, reports and notices, with the permit number prominently displayed, must be sent to the Gresham Office as identified in Condition 7.3.

**7.0 ADMINISTRATIVE REQUIREMENTS**

**7.1. Permit Renewal Application**

A complete application for reassignment to this permit is due within 60 days after the permit is reissued. DEQ will notify the permittee when the permit is reissued. The application must be sent to the appropriate regional office.

- a. 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 DEQ takes final action on the application.
- b. If a complete application for reassignment to the General permit, or application made for a Simple or Standard permit in a timely manner, the permit will not be deemed to expire until final action has been taken on the application.

**7.2. Permit Coordinator Addresses**

All applications should be directed to the Permit Coordinator for the area where the source is located. The Permit Coordinator addresses are as follows:

Counties	Permit Coordinator Address and Telephone
Clackamas, Clatsop, Columbia, Multnomah, Tillamook, and Washington	Department of Environmental Quality Northwest Region 2020 SW 4th Avenue, Suite 400 Portland, OR 97201-4987 Telephone: (503) 229-5582

Benton, Coos, Curry, Douglas, Jackson, Josephine, Lincoln, Linn, Marion, Polk, and Yamhill	Department of Environmental Quality Western Region 750 Front Street NE, Suite 120 Salem, OR 97301-1039 Telephone: (503) 378-5305
Baker, Crook, Deschutes, Gilliam, Grant, Harney, Hood River, Jefferson, Klamath, Lake, Malheur, Morrow, Sherman, Umatilla, Union, Wallowa, Wasco, Wheeler	Department of Environmental Quality Eastern Region 475 NE Bellevue Dr., Suite 110 Bend, OR 97701 Telephone: (541) 633-2021

**7.3. DEQ Contacts** Information about air quality permits and DEQ’s regulations may be obtained from the DEQ web page at [www.oregon.gov/DEQ](http://www.oregon.gov/DEQ). All inquiries about this permit should be directed to the regional office for the area where the source is located. DEQ’s regional offices are as follows:

<b>Counties</b>	<b>Office Address and Telephone</b>
Clackamas, Clatsop, Columbia, Multnomah, Tillamook, and Washington	Department of Environmental Quality Gresham Office 1550 NW Eastman Parkway, Suite 290 Gresham, OR 97030 Telephone: (503) 667-8414
Benton, Lincoln, Linn, Marion, Polk, and Yamhill	Department of Environmental Quality Salem Office 750 Front Street NE, Suite 120 Salem, OR 97301-1039 Telephone: (503) 378-8240
Coos, Curry, and Western Douglas	Department of Environmental Quality Coos Bay Office 340 N Front Street Coos Bay, OR 97420 Telephone: (541) 269-2721
Eastern Douglas, Jackson, and Josephine	Department of Environmental Quality Medford Office 221 Stewart Avenue, Suite 201 Medford, OR 97501 Telephone: (541) 776-6010
Baker, Crook, Deschutes, Gilliam, Grant, Harney, Hood River, Jefferson, Klamath, Lake, Malheur, Morrow, Sherman, Umatilla, Union, Wallowa, Wasco, and Wheeler	Department of Environmental Quality Bend Office 475 NE Bellevue Dr., Suite 110 Bend, OR 97701 Telephone: (541) 388-6146

## **8.0 FEES**

- 8.1. Annual Compliance Fee** The Annual Fee specified in OAR 340-216-0020, Table 2, Part 2 for a General ACDP is due on **December 1** of each year this permit is in effect. An invoice indicating the amount, as determined by DEQ regulations, will be mailed prior to the above date.
- 8.2. Change of Ownership or Company Name Fee** The non-technical permit modification fee specified in OAR 340-216-0020, Table 2, Part 3(a) is due with an application for changing the ownership or the name of the company.
- 8.3. Special Activity Fees** The special activity fees specified in OAR 340-216-0020, Table 2, Part 3 (b through i) are due with an application to modify the permit.
- 8.4. Where to Submit Fees** Fees must be submitted to:  
Department of Environmental Quality  
Business Office  
811 SW Sixth Avenue  
Portland, Oregon 97204-1390

## **9.0 GENERAL CONDITIONS AND DISCLAIMERS**

- 9.1. Other Regulations** In addition to the specific requirements listed in this permit, the permittee must comply with all other legal requirements enforceable by DEQ.
- 9.2. Conflicting Conditions** In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply.
- 9.3. 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.
- 9.4. DEQ Access** The permittee must allow DEQ'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.
- 9.5. Permit Availability** The permittee must have a copy of the permit available at the facility at all times.
- 9.6. Open Burning** The permittee may not conduct any open burning except as

allowed by OAR 340 Division 264.

- 9.7. Asbestos** The permittee must comply with the asbestos abatement requirements in OAR 340, Division 248 for all activities involving asbestos-containing materials, including, but not limit to, demolition, renovation, repair, construction, and maintenance.
- 9.8. 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.
- 9.9. Termination, Revocation, or Modification** DEQ may modify or revoke this permit pursuant to OAR 340-216-0082 and 340-216-0084.

## **10.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS**

ACDP	Air Contaminant Discharge Permit	MSDS	material safety data sheet
calendar year	The 12-month period beginning January 1st and ending December 31st	NESHAP	National Emissions Standards for Hazardous Air Pollutants
CFR	Code of Federal Regulations	OAR	Oregon Administrative Rules
DEQ	Oregon Department of Environmental Quality	ORS	Oregon Revised Statutes
EPA	US Environmental Protection Agency	SIC	Standard Industrial Code
HAP	Hazardous Air Pollutant as defined by OAR 340-244-0040	year	A period consisting of any 12-consecutive calendar months

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