

SCAPCA GENERAL ORDER OF APPROVAL
FOR PORTABLE AUTOBODY SURFACE COATING OPERATIONS (PASCO)
ISSUED IN ACCORDANCE WITH :

Chapter 70.94 RCW, SCAPCA REGULATION I, ARTICLE V, CHAPTER 173-
460 WAC & CHAPTER 173-400 WAC

SPOKANE COUNTY AIR POLLUTION CONTROL AUTHORITY
1101 W College, Suite 403
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(509) 477-4727

GENERAL ORDER OF APPROVAL (GOA): # 0001

ISSUANCE DATE: June 21, 2005

SOURCE CATEGORY: PORTABLE AUTOBODY SURFACE COATING OPERATIONS
(PASCO) OPERATING IN SPOKANE COUNTY

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Spokane County Air Pollution Control Authority (SCAPCA)

HEREBY ISSUES A GENERAL ORDER OF APPROVAL (GOA) FOR PORTABLE AUTOBODY SURFACE COATING OPERATIONS (PASCO)

General Permit No. GOA0001

Date: June 21, 2005

Portable Autobody Surface Coating Operations (PASCO) operating at various locations in Spokane County.

THIS ORDER IS ISSUED SUBJECT TO THE FOLLOWING RESTRICTIONS AND CONDITIONS

APPLICABLE CONDITIONS FOR COVERAGE UNDER THE PASCO GOA

Any PASCO, if operated as described in the GOA, is considered to be in compliance with the applicable rules and regulations, as adopted pursuant to Chapter 70.94 RCW, including Chapter 173-400 WAC, Chapter 173-460 WAC and SCAPCA Regulation I, provided that the following conditions are met:

BACT RELATED CONDITIONS

1. No owner and/or operator of a PASCO shall cause or allow the spray application of any coating or other agent containing VOCs unless the coating or agent is applied exclusively by mini-jet/mini-turbine HVLP guns or the equivalent that exhibit a transfer efficiency of at least 65%,

APPROPRIATE OPERATIONAL RESTRICTIONS

CRITERIA RELATED TO RAW MATERIALS

2. No owner and/or operator of a PASCO shall cause or allow the application of any coating which contains greater than 0.1% by weight of one or more compounds of lead or hexavalent chromium.
3. Light duty vehicle refinishing - prohibitions on VOC content. Except as provided in SCAPCA Regulation, Article VI, Section 6.13.F., no owner and/or operator of a PASCO shall cause or allow the application of any coating or other agent to any light duty vehicle or light duty vehicle component, with a VOC content in excess of the limits listed in 40 CFR 59, Subpart B, Table 1 - EPA National Volatile Organic Compound Emission Standards for Automobile Refinish Coatings.
4. Total calendar year material usage for each PASCO is limited to the following:

Material	Annual Usage (gallons)
Primer	3
Base Coat	15
Clear Coat	15
Gun Cleaner	24

CRITERIA RELATED TO ALLOWED OR PROHIBITED LOCATIONS

5. Vehicles shall be painted a minimum of 10 feet from any property line.
6. The owner and/or operator of a PASCO shall not establish a stationary operation for the purposes of performing minor repair, touch-up, or painting either partial or whole vehicles without first obtaining a Notice of Construction approval per SCAPCA Regulation I, Article V. For the purposes of this GOA, a stationary site constitutes single or multiple PASCOs in a fleet operating at another business for more than 52 days in a calendar year. An owner and/or operator may operate both a PASCO and a stationary operation as long as the owner and/or operator applies for, and receives approval of a Notice of Construction for the stationary operation and the PASCO is covered under the GOA.
7. The owner and/or operator of a PASCO shall not paint more than 9 square feet of surface area per vehicle (Nine square feet is approximately equivalent to a fender or door panel).

OTHER SIMILAR CRITERIA DETERMINED BY A PERMITTING AUTHORITY

8. On the 31st day after SCAPCA determines that the owner and/or operator of the PASCO(s) has submitted a complete application, coverage under the GOA is in effect, except for those:
 - a. PASCOs that have been denied coverage, and
 - b. Applications that SCAPCA has deemed incomplete.

SCAPCA must issue a postmarked letter within 30 days of receipt of the application for those PASCOs that have been denied coverage under the GOA and for those applications that have been deemed incomplete. The letter must explain the reason(s) for the denial(s) and/or identify the areas where the application is incomplete.

After 31 days the owner and/or operator of the PASCO(s) may check SCAPCA's website (www.scapca.org) to see if his or her PASCO(s) has been added to the list of those covered under the PASCO GOA. The owner and/or operator of a new PASCO or modification of an existing PASCO that qualifies for coverage under the PASCO GOA may not begin actual operations until the 31st day after SCAPCA receives its complete application for coverage.

9. Housekeeping Requirements

- a. All solvents containing volatile organic compounds (VOCs) or volatile toxic air pollutants flushed through spray equipment during equipment cleaning must be collected in closed containers.
- b. All materials (coatings, wash solvents, waste materials, shop towels, etc.) containing volatile organic compounds (VOC) or volatile toxic air pollutants shall be kept in closed containers.

10. Nuisance conditions and other violations

- a. The occurrence of nuisance conditions (e.g., overspray, odors) is prohibited. The deposition of particulate matter (i.e., overspray) onto the property of others is prohibited. If SCAPCA documents a nuisance condition due to overspray or odors, then the owner and/or operator of the offending PASCO shall take immediate measures to abate the nuisance. A Notice of Violation may be issued, if a nuisance condition is created. The typical way of ensuring that overspray does not migrate to another's property, is to erect an enclosure around the vehicle being painted.
- b. In the event SCAPCA determines there is a recurring nuisance from, or issues one or more NOV's to, the owner and/or operator of a specific PASCO covered under the GOA, SCAPCA may issue an order determining that the offending PASCO is no longer covered under the GOA and require the owner or operator of the offending PASCO to comply with all or part of SCAPCA Regulation I, Article VI, Section 6.13.E.1 or to cease operating that offending PASCO.
- c. In the event SCAPCA determines that the offending PASCO is no longer covered under the GOA, the owner or operator of that offending PASCO shall immediately cease operating that PASCO and either apply for, and receive an approved Notice of Construction or cease operating that PASCO.

11. Administrative Requirements

- a. If the owner and/or operator of a PASCO(s) desires to alter the surface coating process in a manner that changes or increases air emissions (i.e. changes in application methods, increase in material usage), then the owner and/or operator of the PASCO(s) shall contact SCAPCA before the change. SCAPCA will make a written determination whether the proposed modification is covered under the GOA.
- b. For those owners and/or operators that have more than one PASCO, the owner and/or operator shall either list each one on the application with a specific identifier, or submit a separate application for each PASCO. The owner and/or operator must submit a new application for each PASCO added to his or her fleet and provide it with a specific identifier.
- c. The PASCO and its associated equipment is subject to periodic SCAPCA inspections.

12. The Control Officer, or duly authorized representative, shall be allowed at reasonable times to inspect the operation, equipment, and/or records specific to the control, recovery, or release of contaminants into the

atmosphere, in accordance with SCAPCA Regulation I, Article II and RCW 70.94.200. No person shall obstruct, hamper or interfere with any such inspection.

13. Monitoring, reporting and recordkeeping requirements (MRRR)

- a. The owner and/or operator of a PASCO shall keep records of the total amount of each coating category (primer, base coat, and clear coat) and solvent used for each of his or her PASCOs. The material usage records shall be carried by the owner and/or operator of each PASCO and shall be made available to SCAPCA staff upon request. Records for each PASCO shall be kept for the previous two years of operation. The total amount of each coating category (primer, base coat, and clear coat) and solvent, from each of the PASCOs under common ownership, used each year shall be reported annually to SCAPCA on forms provided by SCAPCA. Credit for materials recycled or disposed of as waste will be given, if records documenting the amount of material recycled / disposed are kept and submitted with the annual report.
- b. The owner and/or operator of a PASCO, or fleet of PASCOs, shall register each PASCO with SCAPCA and pay an annual registration fee for each one.
- c. Evidence of coverage under the GOA shall be kept with each PASCO and upon request, be made available for SCAPCA review. Satisfactory evidence may include a printout of the list of covered businesses from SCAPCA's web site.

14. Visible Emissions

- a. Visible emissions from the surface coating operation shall not exceed 10% opacity averaged over any six-minute period, as determined by EPA Method 9.

COMPLIANCE WITH OTHER LAWS, REGS, AND REQUIREMENTS

Coverage under the PASCO GOA does not relieve the owner and/or operator of the PASCO(s) of the obligation to comply with all other applicable federal, state and local laws, regulations and requirements, including but not limited to worker and fire safety requirements.

The PASCO GOA, may be modified, suspended or revoked in whole, or in part, by SCAPCA.

Coverage under the PASCO GOA may be revoked for just cause including, but not limited to, the following:

- 1. Violation of any terms or conditions of the PASCO GOA.
- 2. Obtaining coverage under the PASCO GOA by misrepresentation or failure to fully disclose all relevant facts.

APPEALS

Either the issuance, modification, suspension, or revocation of this PASCO General Order of Approval or denying coverage under the PASCO GOA in line with the procedures outlined in WAC 173-400-560(5)(a) may be appealed (per SCAPCA Regulation I, Article V, Section 5.14 and WAC 173-400-250) to:

Pollution Control Hearings Board
c/o Environmental Hearings Office
PO Box 40903
4224 6th. Avenue SE, Building #2, Rowe Six
Lacey, WA 98504-0903

Appeals must either be filed within 30 days after issuing, modifying, suspending, or revoking the PASCO GOA or within 30 days after mailing of any order issued in line with the process outlined in WAC 173-400-560(5)(a) for revising, denying, or revoking coverage under the PASCO GOA.

Coverage of an individual PASCO under the GOA in line with the procedures outlined in WAC 173-400-560(5)(b) may not be appealed, as in this case, SCAPCA does not issue a permit or order of approval. However, denial of coverage under the PASCO GOA in line with the procedures outlined in WAC 173-400-560(5)(b); may be appealed and must be filed within 30 days after mailing of the letter denying coverage.