

SPECIFIC CONDITIONS

[References are to Title 17 of the Pima County Code [PCC] unless otherwise noted]

Attachment 4 to the ATO – Surface Coating and Abrasive Blasting Requirements

In accordance with condition 119.f.iv, the provisions in this Section are applicable to surface coating and abrasive blasting operations listed in the ATO. All provisions of this section are locally enforceable unless otherwise noted.

1. *Operating Limitations*

[PCC 17.12.350.A.3.a]

[Material Permit Conditions]

For the purpose of these provisions, surface coatings include but are not limited to paints, adhesives, and sealants. A VOC containing surface coating or solvent shall be considered to contain VOC if it contains more than 2%, by weight VOC. A HAP containing surface coating or solvent shall be considered to contain HAP if it contains any individual HAP that is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) at a concentration greater than 0.1 percent by mass, or greater than 1.0 percent by mass for any other individual HAP compound.

[PCC 17.04.340.A.219 & 40 CFR 63.11180]

- a. The Permittee shall not use surface coatings and solvents combined (including architectural coatings) in excess of the daily and annual amounts listed in the ATO.
- b. The Permittee shall not use abrasive blasting media in excess of the daily and annual amounts listed in the ATO.

2. *Organic Solvents and Surface Coating Operations*

- a. The Permittee shall not conduct any spray coating or spray paint operation without minimizing organic solvent emissions. Such operations, other than architectural coating and spot painting, shall be conducted in an enclosed area equipped with controls containing no less than ninety-six percent of the overspray. [PCC 17.16.400.C.1]
- b. The Permittee is prohibited from conducting or performing paint stripping operations that involve the use of methylene chloride (MeCl, CAS 75092), and except for facility maintenance, the Permittee is prohibited from conducting any spray application of coatings that contain target Hazardous air Pollutants (HAP) to metal or plastic parts or products, without submitting an Initial Notification in accordance with 40 CFR Part 63, Subpart HHHHHH to the Control Officer and complying with the applicable requirements. The Control Officer may revise the ATO with an Attachment containing Specific Conditions¹ for sources subject to 40 CFR 63, Subpart HHHHHH. For the purpose of this provision target HAP are compounds of Chromium (Cr), Lead (Pb), Manganese (Mn), Nickel (Ni), or Cadmium (Cd). [PCC 17.12.350.A.3.a, PCC 17.16.530.B111, 40 CFR 63.11169 & 40 CFR 63.11180]

[Material Permit Condition]

- c. The Permittee is prohibited from using halogenated solvents in solvent degreasing/cleaning units (if used) in a total concentration that is greater than 5 percent by weight HAP, without submitting an Initial Notification in accordance with 40 CFR 63, Subpart T to the Control Officer and complying with the applicable requirements. The Control Officer may revise the ATO with an Attachment containing Specific Conditions for sources subject to 40 CFR 63, Subpart T.

[PCC 17.12.350.A.3.a, NESHAP Subpart T Applicability]

[Material Permit Condition]

- d. The Permittee (or contractor) shall not employ, evaporate or dry any architectural coating containing photochemically reactive solvents (PRS) for industrial or commercial purposes, or thin or dilute any architectural coating with a PRS. A PRS shall be any solvent with an aggregate of more than 20% of its total volume composed of the chemical compounds as classified below, or which exceeds any of the percentage composition limitations as stated below. Whenever any organic solvent or any constituent of an organic solvent may be classified from its chemical structure into more than one of the groups of organic compounds described below, it shall be considered to be a member of the group having the least allowable percent of the total volume of solvents: [PCC 17.16.400.C.2-4]
- i. A combination of the following types of compounds having an olefinic or cyclo-olefinic type of unsaturation-hydrocarbons, alcohols, aldehydes, esters, ethers, or ketones: 5%.
 - ii. A combination of aromatic compounds with eight or more carbon atoms to the molecule, except ethylbenzene: 8%.
 - iii. A combination of ethylbenzene, ketones having branched hydrocarbon structures, trichloroethylene or toluene: 20%.
- e. All VOC and HAP containing solvent washings of painting equipment shall be directed into containers that minimize emissions and prevent evaporation into the atmosphere. [PCC 17.16.400.A, PCC 17.16.400.C.1 & 7]

3. Abrasive Blasting Operations

- a. The Permittee shall not cause, suffer, allow or permit the use of any abrasive blasting agent other than clean sand (i.e. washed, and without use of recycling), slag, specialized mineral abrasives (garnet, olivine, et. al.), synthetic abrasives (cut plastic, glass beads, crushed glass, plastic bead, et. al.), or various nut shells. **[Material Permit Condition]**
- b. Emissions from a sandblasting or other abrasive blasting operations shall be controlled by applying water to suppress visible emissions (wet blasting), enclosing the operation, or use of other equivalently effective controls. For the purpose of this provision, air blast (or dry) systems that use low emitting blast agents as provided in condition 3.a, that can readily comply with the opacity limits and visibility limiting standards in conditions 10 and 11, while in operation, shall be considered to be an equivalently effective control. [PCC 17.16.100.D]

Compliance Determination

[PCC 17.12.185.A.3, 4 & 5]

4. Organic Solvents and Surface Coating Operations

- a. The Permittee shall maintain documentation demonstrating that enclosed surface coating operations (paint spray booths) meet the overspray control requirements in condition 2.a by using filters that have a minimum arrestance rating to contain at least 96% of the overspray, or an equivalent system which can be shown to meet the over-spray control requirement, and the Permittee shall ensure that the enclosure and controls are operated and maintained consistent with manufacturer's guidelines or good engineering practice.
- b. The Permittee shall maintain MSDS and/or technical data sheets of surface coatings and solvents used to demonstrate compliance with the architectural coating PRS limits and prohibited materials in conditions 2.d.i through iii, as applicable.

- c. The Permittee shall keep a daily log of the amount of surface coatings and solvents used (including architectural coatings as provided in condition 4.d, below, in gallons, and total the amount used within 30 days of the end of the month and maintain a record of the 12-month rolling total to demonstrate compliance with the limits listed in the ATO.
- d. When conducting spray applied architectural or spot painting activities, the Permittee shall maintain daily logs of the following:
 - i. The location of the activity, application method (airless, air assisted airless, HVLP, spray can, (et. al.) and the controls used (if any); and
 - ii. The type of coating applied and applicable MSDS; and
 - iii. The amount of coating and solvents (excluding water) used, in gallons.

5. *Abrasive Blasting Operations*

The Permittee shall total the amount, in pounds, of abrasive blasting agents used in abrasive blasting operations as provided in conditions 5.a and b. below, within 30 days of the end of the month and maintain a record of the 12-month rolling totals to demonstrate compliance with limits in condition.

- a. For each enclosed abrasive blasting operation in the ATO, the Permittee shall log the daily and monthly amounts of abrasive blasting agents used, in pounds. For the purpose of this provision, small commercial abrasive blasting cabinets shall be deemed by the Control Officer to be insignificant activities and exempt from this requirement provided the cabinet is equipped with filtration control devices.
- b. When conducting non-enclosed outdoor abrasive blasting operations, the Permittee (or contractor) shall maintain daily logs of the following information for each day of operation. If no operations occur, no logs shall be required.
 - i. The location of the activity and controls used (if any); and
 - ii. The abrasive blasting agent used; and
 - iii. The amount of abrasive blasting agent used, in pounds.