

AUTHORIZATION TO OPERATE (ATO)

**UNDER PDEQ CLASS II/III GENERAL AIR QUALITY PERMIT 6205
For
FUEL BURNING EQUIPMENT (BOILERS, HEATERS, & GENERATORS)**



I. FACILITY INFORMATION:

Business Name: MHI RJ Aviation, Inc.
Source Location: 1555 E. Aero Park Blvd, Tucson, Arizona 85756

Permitted Emissions Limits, tons/year:

Conventional or Criteria Air Pollutant								HAP(s)
PM _{2.5}	PM ₁₀	PM	NO _x	VOC	CO	SO ₂	Lead	Total
2.41	2.66	2.66	36.49	31.84	16.80	2.99	Negligible	2.85

II. AUTHORIZED EQUIPMENT:

Equipment, operations, and activities for which emissions are allowed by the general permit are as follows:

Section 3 of the Permit – Fossil Fuel Fired Industrial and Commercial Equipment

Equip.No.	Description/ Location	MFR/ Model	Serial Number/ Unique ID	Maximum Rated Capacity	Date of MFR	Date Installed	Allowable Fuels and Annual Limits		Applicability ¹	
							Natural Gas	Fuel Oil	NSPS Subpart Dc	NESHAP Subpart JJJJJ
							(MMcf, hours, CF)	(Gallons, hours, CF)		
01	Boiler	Unknown	TBD	3.780 MMBtu	TBD	TBD	Unlimited	N/A	No	No
02	Heater	Industrial Air Systems GM1AWE600	90-2855-1	2.875 MMBtu	TBD	TBD	Unlimited	N/A	No	No
03	Heater	Industrial Air Systems GM1AWE600	90-2855-2	2.875 MMBtu	TBD	TBD	Unlimited	N/A	No	No
04	Heater	Industrial Air Systems GM1AWE600	90-2855-3	2.875 MMBtu	TBD	TBD	Unlimited	N/A	No	No
05	Heater	Industrial Air Systems GM1AWE600	90-2855-3	2.875 MMBtu	TBD	TBD	Unlimited	N/A	No	No
06	Heater	Hastings SBRU2408502494	58352	3.000 MMBtu	TBD	TBD	Unlimited	N/A	No	No

¹ The Permittee must submit a significant revision to revise the ATO and meet applicable NESHAP subpart JJJJJ work practices (tune-ups), notification, and reporting requirements for applicable boilers that switch to fuel oil use and become subject to Subpart JJJJJ in the oil firing subcategory as defined in 40 CFR 63.11237. The revision will be subject to a 5-day public comment period.

Rupesh Patel, Air Program Manager, PDEQ

ATO # 6246	
Issue Date:	May 8, 2020
Revised:	N/A
Expiration Date:	January 4, 2022

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Section 3 of the Permit – Fossil Fuel Fired Industrial and Commercial Equipment (Continued)

Equip.No.	Description/ Location	MFR/ Model	Serial Number/ Unique ID	Maximum Rated Capacity	Date of MFR	Date Installed	Allowable Fuels and Annual Limits		Applicability ¹	
							Natural Gas	Fuel Oil	NSPS Subpart Dc	NESHAP Subpart JJJJJ
							(MMcf, hours, CF)	(Gallons, hours, CF)		
07	Heater	Hastings SBRU2408502494	58353	3.00 MMBtu	TBD	TBD	Unlimited	N/A	No	No
08	Heater	Hastings SBRU2408502494	58354	3.00 MMBtu	TBD	TBD	Unlimited	N/A	No	No
09	Heater	Hastings SBRU2408502494	58355	3.00 MMBtu	TBD	TBD	Unlimited	N/A	No	No
10	Heater	Hastings SBRU2408502494	58356	3.00 MMBtu	TBD	TBD	Unlimited	N/A	No	No
11	Heater	Hastings SBRU2408502494	58357	3.00 MMBtu	TBD	TBD	Unlimited	N/A	No	No

¹ The Permittee must submit a significant revision to revise the ATO and meet applicable NESHAP subpart JJJJJ work practices (tune-ups), notification, and reporting requirements for applicable boilers that switch to fuel oil use and become subject to Subpart JJJJJ in the oil firing subcategory as defined in 40 CFR 63.11237. The revision will be subject to a 5-day public comment period.

Section 4B – NESHAP for CI & SI RICE (Emergency Designated Engines):

Equip. No.	Description/ Location	MFR/ Model	Serial Number/ Unique ID	Maximum Rated Capacity	Date of MFR	Date Installed	Limitation ¹	Allowable Fuels
12	Emergency Generator/ Bldg. 3	Detroit/Kohler	TBD	315	Pre-2006	Unknown	100 hrs	Diesel
13	Emergency Fire Pump 1/ Bldg. 5	Unknown	TBD	510	Pre-2006	Unknown	100 hrs	Diesel
14	Emergency Fire Pump 2/ Bldg. 5	Unknown	TBD	510	Pre-2006	Unknown	100 hrs	Diesel
15	Emergency Fire Pump 3/ Bldg. 5	Unknown	TBD	510	Pre-2006	Unknown	100 hrs	Diesel
16	Emergency Fire Pump 4/ Bldg. 5	Unknown	TBD	510	Pre-2006	Unknown	100 hrs	Diesel
17	Emergency Fire Pump 5/ Bldg 5	Unknown	TBD	510	Pre-2006	Unknown	100 hrs	Diesel

¹ The run hours are limited to maintenance testing and readiness checks and non-emergency operation in accordance with the federal requirements. There is no limit on hours of operation during true emergencies.

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OTHER APPLICABLE ATTACHMENTS:

Attachment 4 to the ATO – Surface Coating and Abrasive Blasting Requirements
Supplement to Attachment 4 – NESHAP Subpart HHHHHH - Autobody Refinishing & Miscellaneous Surface Coating Operations

1. Limits for Surface Coatings and Solvents (combined):

<u>N/A</u>	Gallons per Day, and;	<u>15,000</u>	Gallons/Year
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2. Limits for Abrasive Blasting media:

<u>N/A</u>	Pounds per Day, and;	<u>20,000</u>	Pounds/Year
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Attachment 4 to the ATO & Supplements:

Equip. No.	Description/ Location	MFR/ Model	Serial Number/ Unique ID	Rated Capacity	Date of MFR	Date Installed	Annual Throughput Limits
18	Abrasive Blaster/Bldg. 3 (Enclosed System)	Econoline	Unknown	Unknown	Unknown	Unknown	20,000 lb/yr of blast media Equip. No.'s 18 and 19 combined
19	Abrasive Blaster/Bldg. 3 (Enclosed System)	Econoline	Unknown	Unknown	Unknown	Unknown	20,000 lb/yr of blast media Equip. No.'s 18 and 19 combined

Equip. No.	Description/ Location	MFR/ Model	Serial Number/ Unique ID	Rated Capacity	Date of MFR	Date Installed	Annual Throughput Limits
20	Paint Booth	Unknown	Unknown	Unknown	Unknown	Unknown	30 tons VOC or 10 tons HAP/year

Additional Insignificant Equipment and Activities: The facility contains other equipment and operations identified in the application that that have been determined by the Control Officer to be insignificant activities pursuant to PCC 17.04.340.A.114.j.

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Fossil Fuel Fired Industrial and Commercial Equipment determined by the Control Officer to be insignificant per PCC 17.04.340.A.114.j

Equip.No.	Description/ Location	MFR/ Model	Serial Number/ Unique ID	Maximum Rated Capacity	Date of MFR	Date Installed	Allowable Fuels and Annual Limits		Applicability ¹	
							Natural Gas	Fuel Oil	NSPS Subpart Dc	NESHAP Subpart JJJJJ
							(MMcf, hours, CF)	(Gallons, hours, CF)		
-	Heater/ Bldg 3	Industrial Air Systems	Unknown	0.340 MMBTU	Unknown	Unknown	Unlimited	N/A	No	No
-	Heater/ Bldg 3	Industrial Air Systems	Unknown	0.425 MMBTU	Unknown	Unknown	Unlimited	N/A	No	No
-	Heater/ Bldg 3	Industrial Air Systems	Unknown	0.600 MMBTU	Unknown	Unknown	Unlimited	N/A	No	No
-	Heater/ Bldg 3	Industrial Air Systems	Unknown	0.3828 MMBTU	Unknown	Unknown	Unlimited	N/A	No	No
-	Heater/ Bldg 3	Reznor (9 units)	Unknown	0.13 MMBTU/ea	Unknown	Unknown	Unlimited	N/A	No	No
-	Heater/Bldg 2	Trane (10 units)	Unknown	0.12 MMBTI/ea	Unknown	Unknown	Unlimited	N/A	No	No

Non-Emergency SI ICE determined by the Control Officer to be insignificant activities per PCC 17.04.340.A.114.j

Equip. No.	Description/ Location	MFR/ Model	Serial Number/ Unique ID	Maximum Rated Capacity	Date of MFR	Date Installed	Run Hour Limitation ¹	Allowable Fuels/ Annual Limit
-	Aircraft Power Ground Unit (Moves on Site)	Hobart	Unknown	90 HP	Unknown	Unknown	None	Diesel/ Unlimited
-	Aircraft Power Ground Unit (Moves on Site)	Hobart	Unknown	240 HP	Unknown	Unknown	None	Diesel/ Unlimited

SPECIFIC CONDITIONS

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

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

In accordance with Condition 119.f.iv of the permit, the terms and Conditions in this Attachment are applicable to surface coating and/or abrasive blasting operations listed in the ATO. All provisions of this section are locally enforceable unless otherwise noted.

Definitions

The following definitions shall have the meaning as defined in the Clean Air Act or Title 17 of the Pima County Code. If a term is not defined, it shall be interpreted in accordance with normal business use:

Air Pollution or Air Pollutant means the presence in the outdoor atmosphere of one or more air contaminants or combination thereof, in sufficient quantities, which either alone or in connection with other substances, by reason of their concentration and duration are or tend to be injurious to human, plant, or animal life; or causes damage to property; or unreasonably interferes with the enjoyment of life or property of a substantial part of a community, or obscures visibility; or which in any way degrades the quality of the ambient air below the standards established by the board of supervisors.

Appurtenance means any accessory to a stationary structure coated at the site of installation, whether installed or detached, including but not limited to bathroom and kitchen fixtures; cabinets; concrete forms; doors; elevators; fences; hand railings; heating equipment, air conditioning equipment, and other fixed mechanical equipment or stationary tools; lamp posts; partitions; pipes and piping systems; rain gutters and downspouts; stairways, fixed ladders, catwalks, and fire escapes; and window screens.

Architectural coating means a coating used commercially or industrially for residential, commercial or industrial buildings and their *appurtenances*; structural steel; and other fabrications such as storage tanks, bridges, beams and girders.

Coating As Applied means the composition of the coating at the time immediately prior to its application, including any final addition of solvent (diluent) to the coating formulation before such coating is applied.

Halogenated hazardous air pollutant solvent or halogenated HAP solvent means solvents that contain methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5), and chloroform (CAS No. 67-66-3).

HAP containing material means a material that contains any volatile or nonvolatile *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 HAP compound. For the purpose of determining whether materials used contain the HAP compounds, the Permittee may rely on formulation data provided by the manufacturer or supplier, such as the safety data sheet (SDS), as long as it represents HAP compound in the material that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other HAP compounds.

Hazardous Air Pollutant (HAP) means a pollutant listed in § 112 (b) of the Clean Air Act (CAA).

Operation means any physical or chemical action resulting in the change in location, form, physical properties or chemical character of a material.

Solvent degreasing means the removal of loosely held uncured adhesives, uncured ink, uncured coatings and contaminants which include dirt, soil and grease from parts, products, tools, machinery, equipment, and general work areas using a solvent that contains two percent by weight or more of a regulated air pollutant.

Solvent degreasing unit means any single container with a capacity of two gallons or more used for solvent degreasing.

Source means any building, structure, facility or installation that may cause or contribute to air pollution or the use of which may eliminate, reduce or control the emission of air pollution.

Spot Painting means any spray painting for the purpose of lettering, stenciling, or identifying containers or similar work; any painting using a spray can; or any spray painting where less than 50% of the total surface area of the object is coated and the total surface area coated is less than 16 square feet.

Suitable Enclosure means a confined area, completely enclosed (side curtains or small openings are allowed as long as the ventilation air maintains the enclosure under negative pressure such that air is drawn into the booth openings or side curtains, where all exhaust from the controls is controlled as described in Condition 2.a.i of this Attachment.

Volatile Organic Compounds (VOC) means any compound of carbon, excluding carbon monoxide (CO), carbon dioxide (CO₂), carbonic acid, metallic carbides, or carbonates, and ammonium carbonate, which participates in atmospheric photochemical reactions. This includes any organic compound other than those in the definition in PCC 17.04.340.A(250), which have been determined to have negligible photochemical reactivity.

VOC Containing means a material that contains two percent by weight or more VOC as determined by the manufacturer's safety data sheet (SDS) or technical product data sheet, or ASTM 2369, or methods set forth in 40 CFR 60, Appendix A. For the purpose of determining whether materials used contain the VOC compounds, the Permittee may rely on formulation data provided by the manufacturer or supplier, such as the safety data sheet (SDS).

VHAP Containing means a HAP containing material that contains volatile HAP constituents.

Emission Limitations and Standards

[PCC 17.13.020.A.2]

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, diluents, adhesives, sealants, wash, and clean-up solvents. This provision shall apply to VOC containing and HAP containing surface coatings or solvents used at the facility.

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

- a. The Permittee shall not use surface coatings and solvents combined (including those used for architectural and/or outdoor spot painting activities) 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 Operation Standards

a. Suitable Enclosure

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 & PDEQ Tech Policy 202]

- i. An approvable operation shall be one that is conducted in any suitable enclosure where the overspray is directed to either:
 - (a) A filtering system designed for controlling the particulate portion of the overspray;
 - (b) A commercially designed water curtain or equivalent;
 - (c) A baffle system designed for the purpose, along with a statement by the manufacturer that the 96% overspray control requirement will be met; or
 - (d) Any other system, which can be shown to meet the 96% overspray control requirement.Use of one or more of the controls in Condition 2.a.i demonstrates compliance, unless evidence of overspray is observed outside of the enclosure.
- ii. For the purpose of approving filtering or other systems in Condition 2.a.i the Control Officer may approve any system where the overspray is exhausted through one or more filters commercially designed for the primary purpose of removal of particulate matter from spray applied surface coating and painting operations. Such spray booths shall be installed and maintained in accordance with the manufacture's recommendations or an operation and maintenance plan developed by the Permittee.
- iii. The spray booth exhaust must be directed vertically up into the atmosphere and at a reasonable stack height as described in Condition 14.c of the permit.

b. Solvent Degreasing/Cleaning

- i. Solvent degreasing units shall be equipped with lids that are kept closed when not in use and/or equipped with a drain-back system to keep the basin empty when not in use. [PCC 17.16.400.A]
- ii. 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]

c. Prohibited Activities

- i. 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 HAP to metal or plastic parts or products, without having first submitted 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 provide a supplement to this Attachment containing Specific Conditions for applicable sources (See Supplement to Attachment 4 for NESHAP Subpart HHHHHH affected sources).

[PCC 17.12.350.A.3.a, PCC 17.16.530.B111, 40 CFR 63.11169 & 63.11180]

[Material Permit Condition]

- ii. The Permittee is prohibited from using halogenated solvents in solvent degreasing/cleaning units in a total concentration that is greater than 5 percent by weight HAP, without having first submitted 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 provide a supplemental 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. Architectural Coating Standard

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%.

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 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 of this attachment, that can readily comply with the opacity limits and visibility limiting standards in Conditions 17 and 18 of the permit, 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 of this attachment 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. As applicable, the Permittee shall monitor and keep the following records of the VOC containing and HAP containing surface coating materials (including but not limited to coatings, paints, adhesives, sealants, diluents, wash, and clean-up solvents) used (in gallons) onsite in a complete and consistent manner and shall make them available for review by the Control Officer without delay during normal business hours to demonstrate compliance with Conditions 1.a and 2.d of this attachment.
 - i. The following records of usage (in gallons):

The Permittee shall maintain purchase records of the volume (in gallons) of each surface coating material used each month and the resulting 12-consecutive month facility total. The 12-consecutive month total is defined as the sum of the usage for the current month and usage for the previous eleven months.
 - ii. The name, indexed ID, and Safety Data Sheet, for VOC containing and HAP containing surface coating materials used onsite including the identification of coatings which fall into the following subcategories:
 - (a) Architectural coatings
 - (b) Coatings used for outdoor spot painting
- c. The Permittee shall keep daily logs of the amount (in gallons) and the indexed ID (as provided in Condition 4.b.ii, above) of surface coatings and solvents used in each spray booth or enclosure and for architectural coating or spot painting activities (as provided in Condition 4.d, below) and total the amount used within 30 days of the end of the month. These records shall be kept in addition to the records in Condition 4.b of this attachment.
- d. When conducting architectural or outdoor spot painting activities not normally applied in an enclosure, 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 SDS or indexed ID (as provided in Condition 4.b, above); 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 5.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 the limits in the ATO.

- a. For each enclosed abrasive blasting operation listed 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.

Additional Applicable Regulations

Pima County Code Title 17, Chapter 17.16 – Emission Limiting Standards

Article III – Emissions from Existing and New Nonpoint Sources

17.16.100.D Particulate materials (abrasive blasting)

Pima County Department of Environmental Quality – Technical Procedures

PDEQ Tech Policy 202 – Controlling Overspray in Paint Spray Operations

**Supplement to Attachment 4 for NESHAP Subpart HHHHHH –
Autobody Refinishing & Miscellaneous Surface Coating Operations**

In accordance with Condition 119.f.v of the permit, the terms and Conditions in this Supplement apply to all NESHAP Subpart 6H affected Autobody Refinishing Operations and Miscellaneous Surface Coating Operations listed in the ATO. This Supplement does not apply to surface coating of *military munitions*, or surface coating that meets the definition of *quality control* or *research and laboratory activities*. The Permittee must comply with Conditions 1 through 5 of Attachment 4 to the ATO as well as the additional terms and Conditions in this Supplement. All provisions of this section are federally enforceable unless otherwise noted.

Definitions

The following definitions shall have the meaning as defined in the Clean Air Act or Title 17 of the Pima County Code, and NESHAP Subpart HHHHHH, unless otherwise defined in this Supplement. Terms below marked with an asterisk are terms defined in 40 CFR § 63.11180. If a term is not defined, it shall be interpreted in accordance with normal business use:

*Aerospace vehicle or component** means any fabricated part, processed part, assembly of parts, or completed unit, with the exception of electronic component, of any aircraft including but not limited to airplanes; helicopters; missiles; rockets; and space vehicles.

*Airless and air-assisted airless spray** means any paint spray technology that relies solely on the fluid pressure of the paint to create an atomized paint spray pattern and does not apply any atomizing compressed air to the paint before it leaves the paint nozzle. Air-assisted airless spray uses compressed air to shape and distribute the fan of atomized paint, but still uses fluid pressure to create the atomized paint.

*Appurtenance** (See also *Facility maintenance*) means any accessory to a stationary structure coated at the site of installation, whether installed or detached, including but not limited to bathroom and kitchen fixtures; cabinets; concrete forms; doors; elevators; fences; hand railings; heating equipment, air conditioning equipment, and other fixed mechanical equipment or stationary tools; lamp posts; partitions; pipes and piping systems; rain gutters and downspouts; stairways, fixed ladders, catwalks, and fire escapes; and window screens.

*Autobody Refinishing Operation** means an operation that encompasses motor vehicle and mobile equipment *spray-applied surface coating operations* that perform spray application of coatings as defined herein to motor vehicles and mobile equipment including operations that are located in stationary structures at fixed locations, and mobile repair and refinishing operations that travel to the customer's location, except spray coating applications that meet the definition of *facility maintenance*.

*Coating** means a material spray-applied to a substrate for decorative, protective, or functional purposes. For the purposes of this definition, coating does not include the following materials:

- a. Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances.
- b. Paper film or plastic film that may be pre-coated with an adhesive by the film manufacturer.
- c. Paper film or plastic film that may be pre-coated with adhesive by the film manufacturer.
- d. Adhesives, sealants, maskants or caulking materials.
- e. Temporary protective coatings, lubricants or surface preparation materials.
- f. In-mold coatings that are spray-applied in the manufacture of reinforced plastic composite parts.

*Electrostatic application** means any method of coating application where an electrostatic attraction is created between the part to be coated and the atomized paint particles.

Facility Maintenance* means surface coating performed as part for the routine repair or renovation of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity. Facility maintenance also includes surface coating associated with the installation of new equipment or structures, and the application of any surface coating as part of the janitorial activities.

- a. Facility Maintenance includes the application of coatings to stationary sources or their appurtenances at the site of installation; portable buildings at the site of installation; and pavements or curbs.
- b. Facility Maintenance also includes the refinishing of mobile equipment in the field or at the site where they are used in services and at which they are intended to remain indefinitely after refinishing, including, but not limited to farm equipment and mining equipment, for which it is not practical or feasible to move to a dedicated mobile equipment refinishing facility. Such mobile equipment also includes items such as fork trucks that are used in a manufacturing facility and refinished in that same facility.
- c. Facility Maintenance does not include surface coating of motor vehicles, mobile equipment, or items that routinely leave and return to the facility, such as delivery trucks, rental equipment, or containers used to transport, deliver, distribute, or dispense commercial products to customers, such as compressed gas canisters.

HAP containing material means a material that contains any volatile or nonvolatile 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 HAP compound. For the purpose of determining whether materials used contain the HAP compounds, the Permittee may rely on formulation data provided by the manufacturer or supplier, such as the safety data sheet (SDS), as long as it represents HAP compound in the material that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other HAP compounds.

Hazardous Air Pollutant (HAP) means a pollutant listed in § 112 (b) of the Clean Air Act (CAA).

High-volume, low-pressure (HVLP) spray equipment* means spray equipment that is permanently labeled as such and used to apply any coating by means of a spray gun which is designed and operated between 0.1 and 10 pounds per square inch gauge (psig) air atomizing pressure measured dynamically at the center of the air cap and at the air horns

Military Munitions* means all ammunition products and components produced or used by or for the U.S. Department of Defense (DoD) or for the U.S. Armed Services for national defense and security, including military munitions under the control of the Department of Defense, the U.S. Coast Guard, the National Nuclear Security Administration (NNSA), U.S. Department of Energy (DOE), and National Guard personnel. The term military munitions includes: confined gaseous, liquid, and solid propellants, explosives, pyrotechnics, chemical and riot control agents, smokes, and incendiaries used by DoD components, including bulk explosives and chemical warfare agents, chemical munitions, biological weapons, rockets, guided and ballistic missiles, bombs, warheads, mortar rounds, artillery ammunition, small arms ammunition, grenades, mines, torpedoes, depth charges, cluster munitions and dispensers, demolition charges, nonnuclear components of nuclear weapons, wholly inert ammunition products, and all devices and components of any items listed in this definition.

Miscellaneous Surface Coating Operation* refers to a NESHAP 6H affected source category involving the spray application of Target HAP containing coatings to miscellaneous parts and/or products made of metal or plastic, except spray coating applications that meet the definition of facility maintenance or space vehicle. These operations include the collection of equipment used to apply surface coating to miscellaneous parts and/or products made of metal or plastic, including applying cleaning solvents to prepare the surface before coating application, mixing coatings before application, applying coating to a surface, drying or curing the coating after application, and cleaning coating application equipment, but not plating. A single surface coating operation may include any combination of these types of equipment, but always includes at least the

point at which a coating material is applied to a given part. A surface coating operation includes all other steps (such as surface preparation with solvent and equipment cleaning) in the affected source where HAP and/or VOC are emitted from the coating of a part. The use of solvent to clean parts (for example, to remove grease during a mechanical repair) does not constitute a miscellaneous surface coating operation if no coatings are applied. A single affected source may have multiple surface coating operations. Surface coatings applied to wood, leather, rubber, ceramics, stone, masonry, or substrates other than metal and plastic are not considered miscellaneous surface coating operations.

Miscellaneous parts and/or products* means any part or product made of metal or plastic, or combinations of metal and plastic. Miscellaneous parts and/or products include, but are not limited to, metal and plastic components of the following types of products as well as the products themselves: motor vehicle parts and accessories for automobiles, trucks, recreational vehicles; automobiles and light duty trucks at automobile and light duty truck assembly plants; boats; sporting and recreational goods; toys; business machines; laboratory and medical equipment; and household and other consumer products.

Mobile equipment* means any device that may be drawn and/or driven on a roadway including, but not limited to, heavy-duty trucks, truck trailers, fleet delivery trucks, buses, mobile cranes, bulldozers, street cleaners, agriculture equipment, motor homes, and other recreational vehicles (including camping trailers and fifth wheels).

Motor vehicle* means any self-propelled vehicle, including, but not limited to, automobiles, light duty trucks, golf carts, vans, and motorcycles.

Motor vehicle and mobile equipment surface coating* means the spray application of coatings to assembled motor vehicles or mobile equipment. For the purposes of this permit, it does not include the surface coating of motor vehicle or mobile equipment parts or subassemblies at a vehicle assembly plant or parts manufacturing plant.

Quality Control Activities* means surface coating or paint stripping activities that meet all of the following criteria:

- a. The activities associated with a surface coating or paint stripping operation are intended to detect and correct defects in the final product by selecting a limited number of samples from the operation, and comparing the samples against specific performance criteria.
- b. The activities do not include the production of an intermediate or final product for sale or exchange for commercial profit; for example, parts that are surface coated or stripped are not sold and do not leave the facility.
- c. The activities are not a normal part of the surface coating or paint stripping operation; for example, they do not include color matching activities performed during a motor vehicle collision repair.
- d. The activities do not involve surface coating or stripping of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity; that is, the activities are not facility maintenance.

Research and Laboratory Activities* means surface coating or paint stripping activities that meet one of the following criteria:

- a. Conducted at a laboratory to analyze air, soil, water, waste, or product samples for contaminants, or environmental impact.
- b. Activities conducted to test more efficient production processes, including alternative paint stripping or surface coating materials or application methods, or methods for preventing or reducing adverse environmental impacts, provided that the activities do not include the production of an intermediate or final product for sale or exchange for commercial profit.
- c. Activities conducted at a research or laboratory facility that is operated under the close supervision of technically trained personnel, the primary purpose of which is to conduct research and development into new processes and products and that is not engaged in the manufacture of products for sale or exchange for commercial profit.

Space Vehicle* means vehicles designed to travel beyond the limit of the earth's atmosphere, including but not limited to satellites, space stations, and the Space Shuttle System (including orbiter, external tanks, and solid rocket boosters).

Spray-applied coating operations* means coatings that are applied using a hand-held device that creates an atomized mist of coating and deposits the coating on a substrate. For the purposes of this subpart, spray-applied coatings do not include the following materials or activities:

- a. Coatings applied from a hand-held device with a paint cup capacity that is equal to or less than 3.0 fluid ounces (89 cubic centimeters).
- b. Surface coating application using powder coating, hand-held, non-refillable aerosol containers, or non-atomizing application technology, including, but not limited to, paint brushes, rollers, hand wiping, flow coating, dip coating, electrodeposition coating, web coating, coil coating, touch-up markers, or marking pens.
- c. Thermal spray operations (also known as metallizing, flame spray, plasma arc spray, and electric arc spray, among other names) in which solid metallic or non-metallic material is heated to a molten or semi-molten state and propelled to the work piece or substrate by compressed air or other gas, where a bond is produced upon impact.

Target HAP* are compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

Target HAP containing coating* means a spray-applied coating that contains any individual target 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 target HAP compound. For the purpose of determining whether materials you use contain the target HAP compounds, you may rely on formulation data provided by the manufacturer or supplier, such as the material safety data sheet (MSDS), as long as it represents each target HAP compound in the material that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other target HAP compounds.

Transfer efficiency* means the amount of coating solids adhering to the object being coated divided by the total amount of coating solids sprayed, expressed as a percentage. Coating solids means the nonvolatile portion of the coating that makes up the dry film.

VOC Containing means a material that contains two percent by weight or more VOC as determined by the manufacturer's safety data sheet (SDS) or technical product data sheet, or ASTM 2369, or methods set forth in 40 CFR 60, Appendix A. For the purpose of determining whether materials used contain the VOC compounds, the Permittee may rely on formulation data provided by the manufacturer or supplier, such as the safety data sheet (SDS).

VHAP Containing means a HAP containing material that contains volatile HAP constituents.

Emission Limitations and Standards

[PCC 17.13.020.A.2]

6. Painter Certification

[40 CFR 63.11173(e)(1 & (f))]

The Permittee shall ensure and certify that all new and existing personnel, including contract personnel, who apply surface coatings subject to this section, have completed training in the proper spray application of the surface coatings and the proper setup and maintenance of spray equipment by the dates in Condition 6.d, below. The spray application of surface coatings is prohibited by persons who are not certified as having this training. This Condition does not apply to the students of an accredited surface coating training program who are under the direct supervision of an instructor who meets the requirements of this Condition. The training program must include, at minimum:

- a. A list of all current personnel, by name and job description, who are required to be trained;

- b. Hands-on and classroom instruction that address, at minimum, initial and refresher training as follows:
 - i. Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate;
 - ii. Spray technique for different types of coatings to improve *transfer efficiency* and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke;
 - iii. Routine spray booth and filter maintenance, including filter selection and installation; and
 - iv. Environmental compliance with the requirements of this permit;
- c. A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. If the Permittee can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in Condition 6.b, above, the Permittee is not required to provide the initial training in Condition 6.b to these painters.
- d. All personnel subject to the training requirements must be trained and certified no later than January 10th, 2011 or within 180 days after hiring. Painter training that was completed within 5 years prior to the date training is required, and that meets the requirements specified in Condition 6.b, above, satisfies this requirement and is valid for a period not to exceed 5 years after the date the training is completed. Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire. Training and certification shall be valid for a period not to exceed 5 years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of this section and be re-certified every 5 years. [40 CFR 63.11173(g)]

7. Spray Booth & Enclosure Controls

[40 CFR 11173(e)(2)]

All spray-applied *coatings* must be applied in a spray booth, preparation station or mobile enclosure, meeting the following requirements:

- a. All spray booths, preparation stations and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98% capture of paint overspray. The Permittee may use published filter efficiency data provided by filter vendors to determine compliance with this requirement and is not required to perform the measurement in accordance with Condition 10.a. The requirements of this paragraph do not apply to water wash spray booths that are operated and maintained according to the manufacturer's specifications.
- b. Spray booths and preparation stations used to refinish complete *motor vehicles* or *mobile equipment* must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. However, if a spray booth is fully enclosed and has seals on all door and other openings and has an automatic pressure balancing system, it may be operated at up to, but not more than, 0.05 inches water gauge positive pressure.
- c. Spray booths and preparation stations used to coat *miscellaneous parts and products* or vehicle subassemblies must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof may have openings, if needed, to allow for conveyors and parts to pass through the booth during the coating process.
- d. Mobile ventilated enclosures that are used to perform spot repairs must enclose, and, if necessary, seal against the surface around the area being coated such that paint overspray is retained within the enclosure and directed to a filter, as required in Condition 7.a to capture paint overspray.

8. Spray Gun Requirements

[40 CFR 63.11173(e)(3) & (4)]

- a. Except as provided in Condition 8.c, all spray-applied coatings shall be applied with one of the following:
 - i. High volume, low pressure (*HVLP*) spray gun;
 - ii. *Electrostatic* application;
 - iii. *Airless* spray gun;
 - iv. *Air-assisted airless* spray gun; or
 - v. An equivalent technology that is demonstrated by the spray gun manufacturer, and approved by EPA or PDEQ, to achieve *transfer efficiency* comparable to items i-iv, for a comparable operation. Equivalency shall be documented as provided in Condition 11.c.
- b. All spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. Approved methods include:
 - i. Hand cleaning of disassembled gun parts in a container of solvent;
 - ii. Flushing solvent through gun without atomizing the solvent and paint residue;
 - iii. Employing fully enclosed spray gun washer;
 - iv. A combination of non-atomizing methods.
- c. The requirements of Condition 8.a do not apply to spray guns with a cup capacity less than 3.0 fluid ounces (89 cc) or to painting performed by students and instructors at paint training centers. In addition, the requirements of Condition 8.a do not apply to the surface coating of *aerospace vehicles* that involves the coating of components that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces; to the application of coatings on *aerospace vehicles* that contain fillers that adversely affect atomization with *HVLP* spray guns; or to the application of coatings on *aerospace vehicles* that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.).

Compliance Determination

[PCC 17.13.020.A.3.4,& 5]

9. Monitoring Requirements

[PCC 17.13.020.A.3.c & d]

- a. The Permittee shall monitor each exhaust filter pressure gauge (in inches of water) at least once per calendar month while the equipment is operating; and as necessary, the exhaust filter shall be replaced according to the manufacturer's specifications or the Permittees own operation and maintenance plan.
- b. The Permittee shall inspect the exterior of each spray booth, preparation station, or mobile enclosure at least once per calendar month for evidence of overspray. If evidence of overspray is apparent, the Permittee shall take corrective action to eliminate overspray from the exterior of each spray booth, preparation station, or mobile enclosure.
- c. The Permittee shall monitor and record the amount of VOC containing, Target HAP containing, or VHAP containing surface coating materials (including coatings, diluents, wash, and clean-up solvents) used (in gallons) in each enclosed surface coating operation (spray booth, preparation station, and mobile enclosure) each month. In addition, the Permittee shall monitor and record the surface coating materials used each month as required by Condition 4.b of Attachment 4 to the ATO.

10. Testing Requirements

[PCC 17.13.020.A.3]

When required, the following test methods and procedures shall be used to determine compliance with this Supplement.

- a. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, “Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992.” The test coating shall be high solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-HVLP) air-atomized spray gun, operating at 40 pounds per square inches (psi) air pressure. The air flow rate across the filter shall be 150 feet per minute.
- b. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District’s “Spray Transfer Efficiency Test Procedure for Equipment User, May 24, 1989,” and “Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002.”

11. Recordkeeping Requirements

[PCC 17.13.020.A.4]

The Permittee must maintain copies of the following records as specified in Condition 25 of the permit. Copies of records must be kept on site in a printed or electronic form that is readily available for inspection for at least 2 years after their date, and may be kept off-site after that two-year period:

[40 CFR 63.11178]

- a. The Permittee shall keep records, for each painter, certifying the completed training detailed in Condition 6. At a minimum, the records shall include:
[40 CFR 63.11177(a)]
 - i. Name;
 - ii. Date of initial training; and
 - iii. Date the most recent refresher training was completed.
- b. For each spray booth, preparation station, and mobile enclosure the Permittee shall keep records of the following:
[40 CFR 63.11173(e)(2)(i), 63.11177(e)(2)(i), 17.13.020.A.4]
 - i. The filter efficiency of the exhaust filter material as provided by filter vendors demonstrating compliance with Condition 7.a or a test report of the measured filter efficiency according to the procedure in Condition 10.a;
 - ii. The monthly exhaust filter pressure gauge readings and dates when each exhaust filter is replaced;
 - iii. Any corrective actions taken to reduce overspray as a result of spray booth inspections in Condition 9.b;
 - iv. The results of any corrective actions taken; and
 - v. Logs of the gallons of each VOC containing, Target HAP containing, or VHAP containing material used each month and the resulting 12-consecutive month total. The recorded materials used shall be indexed in the log to the list required in Condition 4.b of Attachment 4 to the ATO.
- c. For each spray gun with a cup capacity greater than 3.0 fluid ounces that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air-assisted spray gun, the Permittee shall obtain and keep documents from the manufacturer that the spray gun has been determined by the EPA or Pima County DEQ to achieve a transfer efficiency equivalent to that of an HVLP spray gun according to the procedure in Condition 10.b.

[40 CFR 63.11173(e)(3) & 40 CFR 63.11177(c)]

- d. The Permittee shall keep records of any deviation from the requirements in this Supplement. These records must include the date and time period of the deviation, a description of the nature of the deviation, and the actions taken to correct the deviation. [40 CFR 63.11177(g)]
- e. Copies of any notification and report required by Condition 12.
- f. Records of any assessments of compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report as provided in Condition 12. [40 CFR 63.11177(h)]

12. NESHAP Notification & Reporting Requirements [PCC 17.13.020.A.5]

- a. For a new source, the Permittee must submit an initial notification described in Condition 13, below, to the Control Officer no later than 180 days after initial startup. [40 CFR 63.40 CFR 63.11175(a)]
- b. For each affected source in the ATO subject to this Supplement, the Permittee shall submit an annual notifications of changes report described in Condition 13, below to the Control Officer by March 1st in each calendar year in which the information previously submitted in either the initial notification, notification of compliance status, or a previous annual notification of changes report has changed. [40 CFR 63.11176(a)]
- c. An existing source subject to this Supplement is in violation of the requirements if the required notification(s) described in Condition 13 were not previously submitted to the Administrator or Control Officer by the applicable dates in 40 CFR 63.11175. A complete application for coverage under this permit certifying compliance of an existing source with the requirements of this Supplement may serve as an initial notification if not previously submitted by the Permittee. If the Permittee is unable to certify compliance at the time of application for coverage under this permit, the Permittee shall indicate the status of compliance in the application. Such sources shall be required to submit a notification of compliance status described in Condition 13, below, every 30 days with an explanation of any noncompliance and a description of the corrective actions being taken. The source must achieve compliance no later than 90 days after submittal of the application. Thereafter the Permittee may be subject civil penalties pursuant to PCC 17.28.070. [40 CFR 63.11175(a)]

13. As required by 40 CFR Part 63, § 63.9(a)-(d), and § 63.11175, the Permittee is required to submit the following notifications and reports to the Control Officer for sources subject to the relevant standards in this Supplement.

- a. Initial Notification [40 CFR 63.11175(a)]

Unless the Permittee has previously submitted an initial notification for an existing affected surface coating operation subject to this Supplement by the dates in in 40 CFR 63.11175, or included the required information in the application for coverage under this permit, the Permittee must submit an initial notification as required by 40 CFR 63.9(b) no later than 180 days after initial startup. The notification must provide the following information:

- i. The company name, if applicable;
- ii. The name, title, street address, telephone number, e-mail address (if available), and signature of the owner and operator, or other certifying company official;
- iii. The street address (physical location) of the affected source and the street address where compliance records are maintained, if different. If the source is a motor vehicles or mobile equipment surface coating operation that repairs vehicles at the customer's location, rather than at a fixed location, such as a collision repair shop, the notification should state this and indicate the physical location where records are kept to demonstrate compliance;
- iv. An identification of the relevant standard (i.e., 40 CFR part 63, subpart HHHHHH);

- v. A brief description of type of operation as follows:
For all surface coating operations, indicate whether the source is a motor vehicles or mobile equipment coating operation or a miscellaneous surface coating operation, and include the number of spray booths and preparation stations, and the number of painters usually employed at the operation.
- vi. A statement of whether the source is already in compliance with each of the relevant requirements identified in this Supplement (as applicable), or whether the source will be brought into compliance by the compliance date.
- vii. For a new source, the Permittee must certify in the initial notification whether the source is in compliance with each of the requirements in this Supplement (as applicable). For an existing source, the Permittee may certify in the initial notification that the source is already in compliance. If the Permittee is certifying in the initial notification that the source is in compliance with the relevant requirements in this Supplement (as applicable), then the Permittee shall include also a statement by a Responsible Official with that official's name, title, phone number, e-mail address (if available) and signature, certifying the truth, accuracy, and completeness of the notification, a statement that the source has complied with all the relevant standards, and that this initial notification also serves as the notification of compliance status.

b. Notification of Compliance Status [40 CFR 63.11175(b)]

For a new source, the Permittee is not required to submit a separate notification of compliance status in addition to the initial notification as specified in Condition 13.a, provided the Permittee was able to certify compliance on the date of the initial notification, as part of the initial notification, and the Permittee's compliance status has not since changed. For an existing source, if the Permittee did not certify in the application for coverage under this permit that the source is already in compliance, then the Permittee must submit a notification of compliance status pursuant to Condition 12.c with the following information:

- i. Your company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different;
- ii. The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other 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 in this Supplement (as applicable) or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance. For autobody refinishing operations and miscellaneous surface coating operations, the relevant requirements are specified in in this Supplement.
- iii. The date of the Notification of Compliance Status.

c. Annual Notification of Changes Report [40 CFR 63.11176(a)]

The Permittee shall submit a report, by March 1st of each calendar year, in which information previously submitted in the Initial Notification, Notification of Compliance Status, or previous Annual Notification of Changes Report, has changed. Deviations and changes associated with the requirements in this Supplement on the date of the report shall be deemed to be a change.

Additional Applicable Regulations

Pima County Code Title 17, Chapter 17.16 – Emission Limiting Standards

Article VII – National Emission Standards for Hazardous Air Pollutants

17.16.530.B.(136) NESHAP Subpart HHHHHH –
Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources