

TECHNICAL SUPPLEMENT FOR AMENDMENT OF AIR QUALITY GENERAL ORDER OF APPROVAL FOR BODY REPAIR AND REFINISHING SHOPS

Date

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On October 5, 2007, Ecology issued General Order of Approval for Automobile Body Repair and Refinishing Shops (General Order No. 07-AQG-002). On December 14, 2007, the USEPA finalized National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR 60 Subpart HHHHH). The new federal rule contains requirements that were not included in General Order No. 07-AQG-002. Nonetheless, all surface coating operations, including automobile body repair and refinishing shops, must comply with the federal rule. Ecology is amending General Order No. 07-AQG-002 to incorporate the missing elements from the federal rule.

The following summarizes the parts of the new federal rule that are in the amended general order:

Paint stripping: This applies only to the use of methylene chloride (alternate name: dichloromethane).

The operator must evaluate each stripping application to assure that the paint *must* be stripped and that nothing but methylene chloride will reasonably do the job. All reasonable efforts must be made to minimize methylene chloride evaporation including keeping lids on containers. The responsible party for the surface coating operation must keep a record of the quantity of methylene chloride-containing materials used, and add it up annually. Those records must be kept on-site for at least five years.

The federal rule does not restrict the amount of methylene chloride a shop may use. Ecology determined that if the shop were to use more than 30 gallons per year of methylene chloride, the modeled ambient air impact would exceed the acceptable source impact level (WAC 173-460-150). Permitting would require a Tier II analysis (WAC 173-460-090). A new source that would require a Tier II analysis prior to permitting is not eligible for a general permit. Consequently, **the amended General Order No. 07-AQG-002 limits methylene chloride to not greater than 30 gallons (332 pounds) per year**.

Spray booth filters:

The spray booth shall be equipped with a filter (arrestor) system capable of not less than 98% capture of overspray nonvolatile material. The minimum allowed capture efficiency in General Order No. 07-AQG-002 of the spray booth filter was 95% prior to this amendment.