

## Surface Coating Operations

There are more than 200 surface coating operations located throughout Spokane County. These businesses apply coatings to metal, plastic, wood, automobiles, recreational vehicles, etc.

Many of the surface coating operations, registered with SCAPCA, are relatively small emission sources.

In fact, two-thirds of these registered surface coating operations each contributes less than one ton of emissions per year. While the individual contribution from these operations may seem insignificant, **the combined emissions from all surface coating operations in Spokane County total over 700 tons of pollutants annually!** Because the total emissions contributed from these sources is significant, SCAPCA regulates surface coating operations and performs periodic inspections at facilities.

Emissions from surface coating operations include VOCs (volatile organic compounds), toxic air pollut-

ants, and particulate matter. VOCs and toxic air pollutants come primarily from solvents evaporating from paint and from cleanup operations. Particulates are emitted from paint overspray but are greatly reduced through the use of filtration systems that capture over 90% of emissions. Filtration systems do not control the VOC or most toxic air pollutant emissions.

### Why is Surface Coating Regulated?

Regulating surface coating operations reduces public exposure to pollutants. The evaporated VOCs react with oxides of nitrogen in the air, in the presence of sunlight, to produce ozone. Ozone, a component of photochemical smog, irritates lungs, eyes and causes breathing difficulty. Particulate matter from paint overspray can become a nuisance, especially if it is deposited on the property of others. Toxic air pollutants contribute to a variety of adverse health effects.

### How is Surface Coating Regulated?

The Surface Coating Regulation (SCAPCA Regulation I, Section 6.13) is designed to reduce particulate emissions, reduce public exposure to toxic air pollutants, prevent the formation of atmospheric ozone, and encourage pollution prevention.

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## Recent inspections reveal four key compliance issues

SCAPCA's Air Quality Specialists recently conducted inspections at area surface coating operations. They report the following as the top four "repeat" compliance problems:

- Open containers of solvent-containing material (e.g. rags)
- Missing/incomplete records of maintenance activities (e.g. for filter changes)
- Filters -- missing or in poor condition (gaps, leaks)
- Equipment -- not using the required HVLP (high volume, low pressure) spray guns for ALL applications (i.e. primers)

If your business involves surface coating, and you need further information and assistance in addressing these and/or other compliance issues, please contact us, we're here to help! SCAPCA: 477-4727.

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## Surface Coating -- *continued from cover page*

### The requirements include:

- ◆ Use of approved application methods (i.e., hvlp, lvlp, dip/roll/brush coat, wet/dry electrostatic)
- ◆ Use of a ventilated spray booth/room with filtered exhaust
- ◆ Vertical exhaust, at least 6 feet above penetration point of roof
- ◆ Approved stack caps
- ◆ Storage of all solvent containing materials in closed containers
- ◆ Maintenance of MSDS, usage records, hazardous waste disposal manifests, for on site review
- ◆ Restriction of lead and hexavalent chromium content of coatings
- ◆ Limitation on VOC content in auto refinishing coatings

### *How are Facilities Inspected for Compliance?*

Periodic inspections are conducted to evaluate compliance with the surface coating regulations. During an inspection, facility operations and records are reviewed, including:

### Operations:

- ◆ Are filters completely covering duct openings?
- ◆ Are filters changed frequently enough? (Is there evidence of paint breakthrough on back surface of the filter, in the duct, inside the stack, etc.?)
- ◆ Is the pressure drop reading across the filters within the range recommended by the manufacturer for adequate particulate control?
- ◆ Does the paint booth exhaust through a vertical stack at least 6 feet above the penetration point of the roof?
- ◆ Are approved stack caps installed?
- ◆ Are approved application methods used to apply coatings?
- ◆ Is the paint gun totally enclosed during clean up, or is solvent flushed through the gun into a container which is immediately sealed?
- ◆ Are rags, waste and other solvent containing materials stored in closed containers to minimize evaporation?

### Records:

- ◆ Are MSDS available for all materials used which indicate VOC and/or toxic/hazardous constituent content?
- ◆ Are records of coating and solvent purchase or usage tracked for reporting to SCAPCA?
- ◆ Are records of hazardous waste disposal kept on site?
- ◆ Are filter changes and pressure drop ranges (if applicable) recorded to document proper operation and maintenance of the paint booth?

For additional information about surface coating regulations, and to request a copy of SCAPCA's surface coating guidebook, contact SCAPCA at 477-4727, and dial in your inspector's extension number:

Deidre Fitzgerald, extension # 108

Albert LePage, extension # 101

Brenda Smits, extension # 106



## Rules Apply to Primer & “Touch up” Painting

SCAPCA's General Surface Coating Regulation applies to all commercial painting operations within Spokane County. **The requirements also apply to touch-up operations and primer application.**

**Primer Application**— A common misconception is that spray application of primer is not “painting,” and therefore is not required to be conducted in a booth or room. Per SCAPCA's regulations, there is no distinction between spray applying primer and spray applying basecoats

or topcoats. All spray application must be performed in approved booths or rooms, regardless of what type of product is being sprayed. All sprayed materials must be applied using HVLP, or other SCAPCA approved methods.

**Touch-up**— Many facilities perform “touch-up” painting. A common misconception is that under SCAPCA's rules, touch-up operations are treated differently than more substantial painting operations, such as collision repair or “com-

plete” paint jobs. The fact is, any spray application of paint, no matter how small the surface area being painted, must be performed in a SCAPCA approved spray paint booth or enclosure.

Recently, portable filtration systems have become available (and in some cases are being used) for performing touch-up and/or primer application outside the booths at painting facilities. Use of this equipment must receive prior approval from SCAPCA, similar to a paint booth, before being installed and operated.

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# New type of permitting process available to SCAPCA

In a round of recent rule making changes, the Washington State Department of Ecology revised Chapter 173-400 WAC – General Regulations for Air Pollution Sources – to allow Ecology and local air pollution control authorities to develop General Orders of Approval (GOA).

The revision includes criteria to ensure that air quality will be protected to the same extent that is required by an individual order of approval, normally referred to as a Notice of Construction (NOC). Terms and conditions in the GOA must include:

- (a) A determination of applicable emissions limitations and/or control requirements;
- (b) The use of Best Available Control Technology;
- (c) Incorporation of appropriate operational restrictions, (i.e. criteria on: physical size of the unit(s) covered, raw materials and fuels used; allowed or prohibited locations; and other criteria determined by a permitting authority to be necessary);
- (d) Monitoring, reporting and recordkeeping requirements to document compliance with the applicable emission limits and control requirements;
- (e) Appropriate initial and periodic emission testing requirements;
- (f) Compliance with applicable SCAPCA, state, and federal regulations; and

- (g) The application and approval process to obtain coverage under the specific general order of approval.

The significance of this regulation change is that SCAPCA may elect to develop a GOA that would cover a whole category of specific air pollution sources (e.g. stationary or portable autobody surface coating operations, or coffee roasters, or boilers, etc.), in lieu of issuing an order of approval for each individual facility. This greatly simplifies the permitting process for qualified smaller air pollution sources, allowing SCAPCA to concentrate on larger, more complex sources. In addition, it has the potential to reduce the costs and time to businesses qualified for coverage under the GOA.

For more information, contact Chuck Studer, 477-4727, ext. # 107. ■

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## Regulation & Program Update

### General Order of Approval for Portable Autobody Surface Coating Operations

Portable Autobody Surface Coating Operations in Spokane County will be the first “category” of sources to benefit from a new General Order of Approval (GOA) which allows eligible businesses to operate at multiple locations, without having to obtain a new approval each time the equipment is moved.

SCAPCA will be sending letters to these businesses, letting them know that the General Order of Approval for Portable Autobody Surface Coating Operations is being developed and will soon be open for public comment.

If you own or operate a Portable Autobody Surface Coating Operation, an applicability checklist will be provided to you prior to your incurring the time and cost for a permit application.

The checklist will inform you whether your operation meets all of the applicability requirements in order to be covered under the GOA.

**If you meet the applicability requirements**, then you must submit a complete General Order of Approval application form to SCAPCA for review. The complete application is subject to a 30-day comment period at

the end of which, the operation will be automatically covered under the GOA, unless during the 30-day comment period, SCAPCA sends a letter stating that the application is denied and gives the reason(s) for the denial.

**If you don't meet the applicability requirements**, then your business would not be considered a portable autobody surface coating operation, and therefore must either immediately cease operations or apply for, and receive approval of a Notice of Construction to operate at a specific location, prior to installing or further operating your equipment. ■

# Can the *TREE TEAM* be your “Dream Team”?

**T**REE stands for Technical Resources for Engineering Efficiency team.

It’s a team made up of engineers and scientists from the Washington State Department of Ecology. They use their expertise in industrial processes and pollution prevention to improve a facility’s efficiency. The team uses research, process modeling and engineering analysis to find ways to reduce waste while helping businesses to save money.

## What does TREE specialize in?

FREE, non-regulatory, and non-binding technical assistance for small to mid-size private businesses. The team specializes in: hazardous waste reduction, wastewater reduction, solid waste reduction, water use optimization, and energy use optimization.

## How is a company selected?

TREE typically works with three to five companies per year. Facilities are selected based upon:

- potential to reduce the environmental effect of the facility
- potential to improve process efficiently and reduce waste
- willingness to work in good faith with the TREE team,
- willingness to implement system changes where economically feasible,
- minimal in-house engineering staff, and/or
- minimal experience with pollution-prevention implementation.

## What if my business is selected?

If your facility is selected for TREE assistance, the team will make several visits to gather information about your processes. They will develop a report with specific recommendations on how you can reduce waste generation, reduce resource consumption, and increase savings. Upon your request, the report can be made confidential. You decide whether or not to implement these pollution prevention opportunities.

## How long does the process take?

Once you’ve been selected, it takes between three and five months.

## What has TREE done for Washington Businesses?

- Since its inception in 1998, the team has made suggestions that could annually:
- Save companies a total of \$1,080,00 each year;
- Reduce hazardous waste generation by 229,000 pounds; and
- Reduce water use by 161 million gallons.

In 2004, the TREE team received the MVP2 (Most Valuable Pollution Prevention Program) Award from the National Pollution Prevention Roundtable.

## How do I apply?

Applications are encouraged! Call one of these program contacts:

Lynn Coleman, 360.407.6738  
Michelle Costenaro, 425.649.7143.

# What your peers are saying about TREE

*“I found the entire TREE team to be very courteous, professional and of incredible value to my firm. They helped show us ways to possibly save money, while at the same time reducing the amount of hazardous waste we create.”*

Eric Hampton, General Manager, Rainier Ballistics, bullet manufacturer. Implementing TREE findings can have the following annual impacts: reduce water use by 116,000 gallons, save \$27,000, and reduce hazardous waste by more than 20,000 pounds.



*“...The savings in reduced operation costs has allowed us to devote more effort to our charitable mission.”*

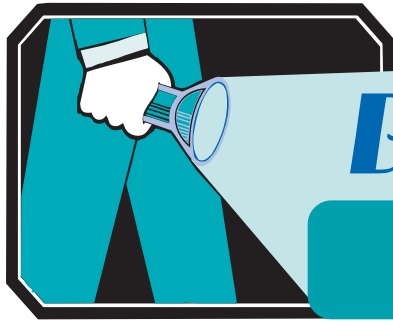
Charlie Harris, CEO, Skills, Inc., metal finishing facility. Suggested improvements should result in an annual savings of \$53,000, eliminate 32,300 pounds of hazardous waste, and reduce water use by 1.6 million gallons.



*“This was a very successful project!”* Don Wilson, Process Manager, Basin Frozen Foods. Suggested optimization of processes saved 40 million gallons/year, resulting in an annual savings of \$80,000 in associated costs.



*“TREE is an excellent way to learn new ideas.”* Yvonne Cox, HR/HSE Manager, Saint Gobain, crystal manufacturer. Implementation of waste audit reduced boron carbide solid waste by 44% (42 ton) per year, with a potential savings of \$47,000/year.



# Business Spotlight

## 2005 Clean Air Award

### Avista Corporation Receives 2005 Clean Air Award

Avista Corporation is the recipient of the 2005 Clean Air Award, presented by SCAPCA at a January ceremony in Spokane.

“Avista Corporation is recognized for their recent air pollution control system upgrades to their Northeast Combustion Turbine facility, located in north Spokane and for their partnership in developing two programs, the effect of which has been to repair or replace over 950 of Spokane’s highest emitting motor vehicles, resulting in a reduction of approximately 235 tons of air emissions to date,” said Eric Skelton, SCAPCA Director.

The Northeast Combustion Turbine facility has been operated by Avista since 1978. Until 2000, it was only used sporadically to help meet peak electricity demand. However, in 2000, when an energy crisis hit the Western U.S., Avista needed to temporarily operate the turbines as base-load power generation units. SCAPCA and Avista entered into an agreement, allowing Avista to operate the turbines extended hours during the energy crisis. In exchange, Avista agreed to upgrade the air pollution control system on the turbines and to implement a project to offset the excess emissions, resulting from extend operation.



*Front Row: Pam Kish and Thomas C. Dempsey, Avista Corporation. Back Row: Doug Pottratz, Avista; Eric Skelton, SCAPCA Director; Hank Nelson, Avista.*

In 2001, Avista installed oxidation catalysts on the turbines, which reduced carbon monoxide emissions by 95%. Other design changes reduced nitrogen oxide emissions from the turbines by over 25%.

In order to offset the excess emissions that occurred during the energy crisis, Avista implemented a number of environmental offset projects.

Avista formulated a partnership with SCAPCA, the Washington State Department of Ecology, Spokane Neighborhood Action Programs, and approximately 20 local auto repair shops to develop and implement two programs:

The Vehicle Emission Repair Program (VERP) and the Voluntary Accelerated Vehicle Replacement program (VAVR).

Recently, the VERP program received national recognition by the Ash Institute, which selected it as one of the “Top 50” programs in the 2005 Innovations in American Government Awards competition. These fifty programs represent the top 5% of the initial applicant pool.

“The Clean Air Award is presented to publicly express our appreciation for innovation and to encourage others to follow suit,” added Skelton.

Congratulations to Avista Corporation, the 2005 Clean Air Award recipient, for your hard work and dedication to improve air quality in our community! ■

# Air · Quality · Calendar

**UPDATE** is published quarterly by Spokane County Air Pollution Control Authority (SCAPCA) as part of its Compliance Assistance Program. Comments, suggestions and story ideas may be directed to Update Editor Lisa Woodard.

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SCAPCA's Board of Directors conduct their monthly meeting on the first Thursday of each month, unless otherwise publicized. The meeting begins at 9 a.m., in the lower level Commissioners Hearing Room, Spokane County Public Works Building, 1026 W. Broadway Ave. Meeting agendas are available at [www.scapca.org](http://www.scapca.org). For more information, please call 477-4727.

June 2:	SCAPCA Board of Directors monthly board meeting (see info above)
July 6:	SCAPCA monthly board meeting (see information above)
Ongoing:	Throughout the year, SCAPCA provides compliance assistance support materials on its website at <a href="http://www.scapca.org">www.scapca.org</a> . Just click on "Business Information" and go from there. If you aren't internet active, all of the materials are available in hard copy at our offices.

## Spokane County Air Pollution Control Authority 2005 Board of Directors:

Matthew Pederson, Chair, Small Cities & Towns Representative  
Michele Pope, Vice Chair, Member-at-Large  
Mike Brewer, City of Spokane Representative  
Phillip Harris, Spokane County Commissioner  
Todd Mielke, Spokane County Commissioner

This newsletter is available electronically via SCAPCA's website. To add or remove names to **UPDATE** mailing list, call 477-4727, ext. 115.

## UPDATE

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