AIR QUALITY REQUIREMENTS FOR AUTOMOTIVE REFINISHERS IN COLORADO

Prepared by the
Small Business Assistance Program
Air Pollution Control Division
Colorado Department of Public Health And Environment

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Colorado Department
of Public Health
and Environment

INTRODUCTION

This booklet was written by the Small Business Assistance Program which is a part of the Colorado Department of Public Health and Environment. It was designed with the automotive refinishing shop owner/operator in mind. Air quality rules have become more and more complicated in the last few years. This booklet is intended to help shop owners and operators to understand what they can do to meet State and Federal air pollution requirements.

The Small Business Assistance Program met with the automotive refinishing industry over a period of about three years. The Automotive Service Association hosted a series of meetings attended by body shop owners, paint suppliers, representatives from State and local Health Departments, and other interested parties. The meetings were used as a forum. We exchanged information about regulations, air pollution inspections, OSHA requirements and the concerns of the automotive refinishing industry. This booklet is a result of numerous requests from shop owners and material suppliers to put the information in one simple-to-read document.

The booklet was developed by the Small Business Assistance Program, with input from permit engineers, State air pollution enforcement personnel, trade representatives, body shop owners and a host of others.

It is our goal to help clear up the confusion that many body shop owners/operators feel when faced with difficult-to-read regulations and conflicting information.

If you have any questions about air quality requirements, please feel free to contact our Small Business Assistance Program. When ypu call, you are welcome to remain anonymous. The phone number is at the back of this booklet.

Air Quality Regulatory Requirements For Auto Body Shops in Colorado

Contents - The following subjects are addressed in this summary of air pollution requirements for body shops in Colorado:

REGULATED AIR POLLUTANTS

Auto Refinishers use a variety of materials regulated as air pollutants by the Colorado Department of Public Health and Environment, Air Pollution Control Division. The main pollutant from body shops is called "VOC", which stands for Volatile Organic Compounds. A VOC is a chemical that evaporates into the air and, in the presence of sunlight, reacts with other chemicals to form ground-level ozone. There is a difference between ground-level ozone and the ozone in the upper atmosphere. Ozone in the upper atmosphere protects us from harmful ultraviolet rays. Ozone at ground level is a highly active oxidant, corrosive to metals, stone and many other materials. Ozone combines with other airborne pollutants to form visible smog. At certain concentrations, ozone is detrimental to human health. Paints, thinners and solvents used for cleanup usually contain VOCs.

Some of the VOCs in painting materials are also Hazardous Air Pollutants (HAPs). A HAP is a pollutant that can cause an increased risk of cancer, birth defects, or other serious or chronic health problems. There is a Colorado list of HAPs in Air Pollution Regulation No. 3, Appendix A. There is also a list of Federal reportable pollutants in Regulation No. 8, Appendix A. The chemicals on this list are "reportable" pollutants. For each individual reportable pollutant, Regulation 3 contains an explanation of what level of emissions (pounds per year) requires reporting. The more toxic or hazardous a pollutant is the lower the level at which it is reportable. For more information about how to report HAPs and who is required to report, see the section on APENs starting on page 3a.

LIST OF HAZARDOUS AIR POLLUTANTS
COMMONLY FOUND IN AUTOMOTIVE PAINTING MATERIALS

The following are the most common HAPs found in automotive painting materials:

Toluene
Xylene
Methyl Ethyl Ketone

(Based on an analysis of BASF and Dupont paint lines. other paint lines may contain different materials).

APEN (AIR POLLUTION EMISSION NOTICE)

What Is An APEN?:

An APEN is a **form** used for reporting any process that releases air pollutants into the air. Most auto refinishing shops must fill out an APEN and send it to the Air Pollution Control Division (APCD) before releasing VOCs and/or HAPs. Whether a shop needs to submit an APEN form depends on the amount of painting materials used by that shop. More specific information about whether your shop requires an APEN is contained in the paragraph below. The APCD, with the help of several body shop owners, created an APEN form specifically for automotive refinishing. You can get an Automotive Refinishing APEN form by calling the Air Pollution Division at (303) 692-3150. If you wish, you can copy the Automotive Refinishing APEN contained at the back of this book in Appendix B.

When AM I Required To Submit An APEN?:

Anyone who operates an automotive refinishing facility is required by State law to submit an APEN to the Air Pollution Control Division if the shop emits 1 ton per year or more of VOCs in any "Nonattainment Area" (See definition of "nonattainment" and "attainment" areas on page 4b. See maps in Appendix C). A shop which uses more than 280 gallons per year of solvents, paints, etc., may require an APEN. This is only a general rule of thumb, since different brands of materials contain greater or smaller amounts of VOC.

In other areas of the state, known as "Attainment Areas", you must submit an APEN if you emit 2 tons per year, or more, of VOCs (Usually more than 450 gallons per year).

Shops that fall below these reporting levels are generally exempted. A shop may want to submit an APEN even if they are below these levels so they can receive a letter of exemption. This letter will serve as written proof that the APCD has reviewed the shop and has designated the shop as exempt from APEN reporting. If you choose this option, you are required to pay the APEN filing fee ($100.00).

- Automotive refinishing facilities must send in an APEN form to the Air Pollution Control Division every five years.

Hazardous Air Pollutants

The owner/operator of any painting operation which emits hazardous air pollutants (HAPs), in excess of the levels listed in Air Pollution Regulation Number 3, is required to submit an APEN to the Air Pollution Control Division. To find out if your shop is required to report, call (303) 692-3150.

Significant Change:

- An APEN is required any time there is a "significant change" in the operation of a business. In nonattainment areas a significant change for VOCs is an increase in emissions of either 5%, or 1 ton per year, whichever is greater. In attainment areas a significant change is an increase of 5 tons per year. A significant change for HAPs is either an increase of 50% or 5 tons per year, whichever is smaller. If your material usage has increased since the last APEN submittal, call the Small Business Assistance Program and we will help you decide if a significant change has occurred.

Permit Modification:

An APEN is required whenever a permit modification is required.

What is a permit modification? A permit modification is a proposed change in a business that requires a change in one or more of the conditions in a permit. An air pollution permit contains a series of conditions. Conditions are the various operating methods and limits that a shop with a permit must follow. For example, automotive refinishing shops will have a permit condition that describes the maximum amount of painting materials used in a year's time.

There are several reasons why a permit might be modified. For instance, when there is a significant change (see above), or a change in materials which results in a different set of pollutants from those previously reported. An APEN is required when emissions increase ANY AMOUNT above permit limits. If a shop wishes to add another paint booth or replace an existing paint booth then the owner/operator must apply for a permit modification by sending an APEN to the Air Pollution Control Division.

Ownership Change:

Whenever the ownership of a shop changes, the new owner is required to send in an APEN to the APCD. The APEN should contain the names of the new and previous owner, the new mailing address if different from the previous mailing address, any change in the name of the shop and any change in the operation that would require a modification of the permit such as the use of different painting materials or clean-up solvents.

Grouping Multiple Sources On One APEN:

As a way of saving money (filing fees) and reducing the amount of paperwork, more than one spray booth can usually be grouped on the same APEN. More than one paint booth can be listed on one APEN if all of the booths listed:

- use the same materials,
- are in a similar location (on the same property),
- none has its own separate air permit, and
- it is difficult to tell which materials are used in each booth.

Calculating Your Emissions:

On the APEN form, shop owners are now required to calculate and report their actual emissions. That means how much VOC and/or HAPs actually evaporate into the air each year as a result of operating the business.

The way to calculate emissions from a body shop is to look at the Material Safety Data Sheet (MSDS) for each material used. From the MSDS you can determine which VOCs and /or HAPs, and how much of each, are contained in each gallon of paint and solvent. Multiply the amount of each VOC and/or HAP in each gallon of material by the number of gallons used per year. The number of gallons used is the amount purchased minus both the amount sent out as waste and the amount still on the shelf.

Add together all of the VOC from all of the different materials. The result is the total actual amount of VOC emitted per year.

Add together the specific HAPs from each material to determine HAPs emissions. For example, if three different materials contain toluene, add together the amount of toluene from each material to get the total amount of toluene emitted from the shop. Do this for each separate "reportable" pollutant.

You may request that the APCD calculate your emissions for you. Call (303) 692-3150 for assistance.

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AIR POLLUTION EMISSION PERMITS

General Information:

Air Pollution Regulations require many auto refinishing shops to obtain air pollution permits. Whether or not you need a permit depends on the amount of VOCs your shop emits, and the shop's location (attainment area or nonattainment area).

A permit is an agreement between the shop owner and the State of Colorado which specifies:

- the type and amount of materials used,
- the type and amount of air pollutants that will be emitted,
- the manner in which emissions of pollutants will be controlled,
- a description of the spray booth, and
- any other conditions required by Air Regulations.

Attainment vs. Nonattainment Areas:

States are divided into two types of areas: "attainment" and "nonattainment".

A nonattainment area is where the concentration of any pollutant in the air is higher than the federal standards. There are special rules for air pollution sources in the "nonattainment" areas.

The federal government sets concentration levels for air pollutants based on the effect each pollutant has on public health. Concentration levels have been set for VOCs, particulate matter, nitrogen and sulfur oxides, lead, and several others. These levels are called Ambient Air Quality Standards.

In Colorado, the area around Denver is **nonattainment** for ozone. Ozone is formed when VOCs and other pollutants mix together in the presence of sunlight. This is why there are special rules for controlling VOCs in the Denver area (for maps of the nonattainment areas, see Appendix C). The more VOCs in the air, the more ozone that is formed.

Please note: If your shop is located in a nonattainment area for ANY pollutant then you must follow the rules for ozone nonattainment areas - even if the area is nonattainment for different pollutant than ozone. For instance, if a shop is located in Canon City where it is nonattainment for particulate matter the shop would still have to follow the rules for an OZONE nonattainment area.

Air pollution concentrations are determined by instruments called monitors. Monitors measure and record the amount of pollution in the air. The Air Pollution Control Division has monitors throughout the state. We can tell if the federal levels are exceeded by looking at the monitor records.

WHO NEEDS A PERMIT?

In Nonattainment Areas:

Shops located in any nonattainment area will need a permit if emissions of VOCs are two tons or more per year.

This means if you use more than 550 gallons per year of solvents, paints, etc., you will most likely need to obtain a permit. However, remember that this amount (550 gallons) is only a general rule of thumb, since different brands of materials may contain greater or smaller amounts of VOC).

In Attainment Areas:

A shop located outside the "nonattainment area" is required to obtain a permit if emissions are five tons or more per year (usually this means more than 1400 gallons of materials).

THE PERMIT PROCESS

The "permit process" refers to the process that each shop goes through in order to satisfy the requirements of the Federal and State air pollution regulations.

The first step you must take in the permit process is to figure out whether you need to submit an APEN. Call the Air Pollution Control Division at (303) 692-3150, or call the Small Business Assistance Program (Phone numbers at the end of this booklet) for help. You can also use these phone numbers to request an APEN form.

If your shop requires an APEN form, then the next step is to fill one out and mail it to the Air Pollution Control Division. The Division will then determine whether your shop requires a permit, based on the information in the APEN.

The Air Pollution Control Division issues permits in two phases: Initial Approval and Final Approval.

First the shop will receive an Initial Approval permit. Technically, a business that requires a permit must have the Initial Approval permit before beginning construction. A business that does not need a permit, but is required to have an APEN, must submit an APEN prior to construction. In fact, the majority of applications come in from shops that are already operating.

After the shop is up and running, an air pollution inspector will visit the shop to ensure that it is operating according to the conditions in the Initial Approval permit. If the shop is following the permit conditions, the inspector will recommend that the APCD issue a Final Approval permit. If the shop is not meeting all of the conditions in the Initial Approval permit, then the inspector will recommend that Final Approval permit be issued once the conditions are satisfied.

The Final Approval permit is valid for the life of the shop.

There are some situations in which a new APEN will be required even after Final Approval has been issued:

- The owner is required to submit a Revised APEN to the Air Pollution Control Division before changes are made in the shop's operation (such as a major increase in material usage).

- A revised APEN is required before new equipment is purchased and installed. This is done so the changes can be written into the permit.

- A Revised APEN is also required if the ownership of the shop changes. Both the owner and the operator of a shop are responsible for seeing that permitting requirements are met.

POLLUTION PREVENTION

Pollution prevention is a method of reducing air emissions and waste. This method is beneficial to everyone involved. Pollution prevention can save the shop money by reducing waste and the cost of waste disposal while, at the same time, reducing the impact on the environment. Traditionally, waste generation and emissions of air pollution have been handled by using "end-of-pipe" solutions. In other words, a shop would produce hazardous waste and air pollution and then figure out how to control their releases. Typically, this approach results in high costs for proper waste handling. If the shop emits enough pollution to trigger control requirements, this "end-of-pipe" approach can result in high costs for air pollution control equipment.

Pollution prevention concentrates on reducing or changing the materials used so that waste and pollutants are not created in the first place or are created in much smaller amounts than they would have been. This is accomplished by analyzing the types and amounts of materials used in a shop and the ways in which they are used. For example the use of HVLP spray guns reduces the amount of material used. This reduces the amount of overspray thereby reducing VOC emissions. The result is lower cost to the business, to the environment, and to public health.

Lower material usage results in lower emissions. A shop that would otherwise need a permit can lower its VOC emissions to a low enough level that the shop no longer requires a permit.

REGULATION NUMBER 7

Regulation No. 7 deals with rules for specific types of VOC sources in the ozone nonattainment area. It also contains some rules that apply to all VOC sources statewide, regardless of the size of the shop.

Reasonably Achievable Control Technology (RACT):

There is no specific rule for automotive refinishers in Regulation Number 7. However, there is a general rule that requires all VOC sources in nonattainment areas to reduce their emissions. This rule is called "Reasonably Available Control Technology", also known as "RACT". For an emission control measure to be called "RACT" it must be both readily available and reasonably inexpensive. For automotive refinishers, using RACT means using High Volume Low Pressure (HVLP) paint spray equipment. If a shop is in any nonattainment area (see map in Appendix C), then the shop must use HVLP equipment to paint any automotive surface which measures over nine square feet (three feet by three feet). This rule does not apply outside of the nonattainment area.

REGULATION NUMBER 7 STATEWIDE RULES
RULES THAT APPLY TO ALL VOC SOURCES, REGARDLESS OF SIZE OR LOCATION

Disposal of VOCs:

Before you may dispose of VOCs by evaporation, or spillage, you must have a disposal/control system approved in writing by the Air Division. If, for some reason, a shop owner wants to dispose of solvents in this manner, he or she should send a letter describing the control system to the Air Pollution Control Division (APCD). A permit review engineer from the APCD will then contact the owner and begin the review process. Written approval from the APCD is required before such a system is installed.

Storage of VOCs:

Containers of solvents, including containers of solvent laden shop rags, must be sealed when not in use to prevent evaporation of VOCs.

Most permits for VOC sources contain a condition that says containers of waste solvent must be kept in a protected area to prevent accidental release of VOCs into the air. This condition became part of the State's permits due to releases of VOCs caused by vandalism. It's also wise to keep drums in a protected area, because of the potential cleanup costs you might face if this type of vandalism (or just an accident) were to occur involving your waste drums. Generally, even in this unusual situation, the owner of the business that generated the waste is responsible and can be forced to pay a fine and, sometimes, for a very expensive clean-up.

AIR INSPECTIONS

When Are Inspections Made?:

- After a shop receives an Initial Approval permit, an air pollution inspector will visit the shop to decide whether to issue the Final Approval permit.

- Once a shop has Final Approval of it's permit, or exemption from a permit, an inspector will visit the shop once every three years.

- An inspector will visit a shop if the APCD receives a complaint from the public.

When an air inspector visits your business he or she will review your material purchase records and waste manifests. The Division determines your material usage and the amount of emissions by looking at the quantity of materials you've purchased in a year, the quantity that remains on the shelf and the quantity that went out as waste. We assume that whatever was sent out as waste and whatever remains on your storage shelf did not evaporate. We assume that the rest of the material did, in fact, go into the air. This is why it is important to keep good records of material purchased and waste disposed.

The inspector will check to ensure that the shop is meeting all of the conditions in the permit.

A copy of a typical permit for automotive refinishing is included in the back of this booklet (Appendix A).

TIME FRAMES -
How Long Does It Take To get A Permit

After the APCD receives an APEN/application it is assigned to an engineer who processes the application according to the following schedule:

1. **Completeness Determination** (Is all of the required information on the APEN form? Were MSD sheets included with the APEN form?) - **60 days**

2. **Preliminary Analysis Completed - 60 days** after receipt of a **complete application** (The Air Division determines what your shop's emissions are and whether a permit or exemption is called for).

3. **Permit Issued - 30 days** after completion of preliminary analysis or end of public comment period (Public Comment is required for shops that emit more than 25 tons per year of VOCs in a nonattainment area, or 50 tons in an attainment area).

4. **Public notice printed in newspaper - 15 days** after preliminary analysis is completed. It is doubtful that any auto body shop in Colorado will require public comment since there are probably no shops that emit 25 tons of VOC per year.

5. **Duration of public comment period - 30 days.**

Application Number

When the Air Pollution Control Division receives your application/APEN, they will send you a receipt. This lets you know that the Division received your materials. On the receipt there will be an application number. Keep a record of this number. This number is used to identify your shop in the Division's tracking system. If you have any questions about your application, using this number will make it easier for the APCD staff to locate your file. If a permit is required for your shop, this number will be used as your permit number.

COSTS:

State law requires APCD to recover costs of operating the permit program by charging filing and processing fees.

APEN Filing Fee - $100.00 per APEN. Some business owners choose to submit an APEN, even though their emissions are below reportable levels. The reason they submit an APEN when they don't have to is so they can receive a Letter of Exemption. If you are not required to file an APEN, but you wish to get a letter of exemption, you will have to pay the $100.00 filing fee.

Permit Processing Fee - based on the amount of time it takes to review your application and perform the analysis of emissions. This processing fee includes time spent by APCD staff meeting with the shop owner, in person or by telephone, to get information needed to complete the permit review. Currently the processing rate is $50.00 per hour.

The Division realizes that permit fees can be expensive. In order to keep shop owners' costs down, the Division has created a special APEN for automotive refinishers (see Appendix B) and has created a computer program to perform the analysis of emissions. The APEN makes it easy to supply the necessary information. Since it is easy for the engineer who receives the application to extract the necessary information processing time is reduced. By computerizing the analysis, the Division has further cut the time required for processing a permit.

The processing fee for Final Approval permits includes the analysis, changes (if any) that must be made to the permit, and the time spent by the air inspector to visit your shop and write his/her report.

Annual fees:

Automotive refinishing facilities pay an annual fee to the APCD based on the amount and type of pollutants emitted. The Air Pollution Control Division mails out bills for annual fees, BASED ON THE INFORMATION FROM YOUR MOST RECENT APEN. The fee for VOC emissions is $14.98 per ton per year, as of the date of this report (Feb., 1995).

There is also an annual fee for any "reportable" air pollutant. These are the pollutants listed at the back of Colorado Air Pollution Regulation No.3, Part A. The fee is $100.00 per ton per year, and the fee will be pro-rated for fractions of tons.

RECYCLING Of A/C REFRIGERANTS

In the process of repairing an automobile, it is often necessary to drain the refrigerant out of the air conditioning system. The refrigerants in air conditioning systems are often referred to as "Freons". More specifically these chemicals are Chlor-Flouro-Carbons (CFCs). CFCs pose a danger to the "ozone layer" of the atmosphere. The ozone layer protects the earth and the public from the effects of the sun's ultraviolet rays. Anyone removing CFC refrigerants must use specific methods and specific equipment in order to prevent the release of CFCs into the atmosphere.

Approved Equipment:

Technicians who remove CFCs from air conditioners must use either recovery/recycle or recovery-only equipment approved by the U.S. Environmental Protection Agency (EPA).

Recovery/ Recycle equipment has the ability to purify used refrigerant and directly return the refrigerant to the automobile's air conditioner.

Recovery-only equipment transfers the refrigerant to a holding tank. By law technicians must either recycle the used refrigerant on site or send the CFCs to an off-site reclamation facility.

Most certified equipment will be labelled "Design-Certified to SAE Standards".

Technician Training, EPA Certification and State Registration:

Technicians who repair or service automotive air conditioners must be trained and certified by an EPA-approved organization and registered with the State.

Two Steps:

1. Training and Certification:

The first step is to enroll in a CFC training course. To find out when and where the courses are offered call the CFC Hotline at (303) 692-3200.

Training programs cover the use of recycling equipment, regulatory requirements, the importance of refrigerant containment and the effects of ozone depletion. Technicians are given a test at the end of the course. Once you pass the test, you are automatically certified by EPA.

2. State Registration:

Technicians must also register with the State. To register with the State you simply need to fill out a registration form and pay a $10.00 registration fee. You must have your EPA certification before you can register with the State. To get a registration form, call the CFC hotline at (303) 692-3200.

Registrations must be renewed each year. They are good from July 1st through June 30th.

SMALL BUSINESS ASSISTANCE PROGRAM

The purpose of the Small Business Assistance Program (SBAP) is to help small businesses understand their rights and obligations under Federal and State air pollution laws. SBAP provides auto body shops with technical and regulatory assistance free of charge.

SBAP is a NON-regulatory program, separate from the inspection/enforcement group and the permit writing group.

SBAP staff can help a facility figure out if it is required to fill out an APEN form. The SBAP can also provide information about pollution prevention, about how to read a Material Safety Data Sheet and how to calculate your VOC and HAP emissions. SBAP can answer questions about State and Federal air pollution requirements.

If you have a group that would like a speaker to discuss air quality regulations and requirements, SBAP is available.

The SBAP works cooperatively with trade and professional organizations, universities, chambers of commerce, SBAs, small business development centers, and many other groups. In this way SBAP can contact and offer assistance to as many small businesses as possible.

You are welcome to call the SBAP for information or to tell us about your concerns regarding how the air quality rules affect your individual shop. When you call, you are welcome to remain anonymous. It is not necessary to tell us who you are in order to receive help from our program. We will do our best to provide you with the technical and regulatory information that you need.

If you would like help or advice you can call the Small Business Assistance Program. The phone number and other useful numbers are located on page 13.

THE SMALL BUSINESS OMBUDSMAN

The Small Business Ombudsman is an advocate for small business in environmental regulatory issues.

Responsibilities of the Small Business Ombusman include:

- informing small business about legislative and regulatory changes;
- representing small business interests before federal, state and local authorities;
- resolving permit disputes.

You are welcome to call the Small Business Ombudsman for information or to discuss your concerns about how air quality rules affect your shop. All calls are confidential.

The Small Business Assistance Program and the Small Business Ombudsman work together to provide small business with the most comprehensive help in dealing with complicated air quality rules and regulations.

The Small Business Ombudsman is located within the Office of Regulatory Reform (ORR). ORR is in a unique position in government. The purpose of ORR is to help small business cope with the problems that occasionally arise when dealing with government. ORR has a business assistance hotline to provide new and expanding businesses with federal, state and local licensing information. If you have any questions, please call.

The phone numbers to the Small Business Assistance Program, the Small business Ombudsman, the Business Assistance Center and other useful numbers are on the following page.

PHONE NUMBERS

Air Pollution Control Division
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

General Assistance, Forms, etc. -	(303) 692-3150
CFC Information Hotline -	(303) 692-3200
Small Business Hotline (Air Division) -	(303) 692-3210

Small Business Assistance Program

Nick Melliadis -	(303) 692-3175
Wade Cook -	(303) 692-3144

Pollution Prevention Division
(Same Address As Air Pollution Control Division, above)

General Pollution Prevention Assistance -	(303) 692-3309

Office of Regulatory Reform
Regulatory Agencies Department
1560 Broadway, Room 1550
Denver, Colorado 80202

Business Assistance Center -	(Denver)	(303) 592-5920
	(Toll Free)	1-800-333-7798

Colorado Small Business Ombudsman

Jocelyn Mills	(303) 894-7837

APPENDIX A

Sample Permit

SAMPLE DRAFT PERMIT

PERMIT NO: 94BO999

INITIAL APPROVAL

DATE ISSUED:

ISSUED TO: FUNTASTIC CAR BODY, INC.

THE SOURCE TO WHICH THIS PERMIT APPLIES IS DESCRIBED AND LOCATED AS FOLLOWS:

Automobile body repair and surface finish shop located at 14056, South Harbor Road, Leeds-On-Tyne, Boulder County, Colorado.

THE SPECIFIC EQUIPMENT OR ACTIVITY SUBJECT TO THIS PERMIT INCLUDES THE FOLLOWING:

Two (2) Binks, Model: XXX-999, S/Ns: 94-XX-7685 & 94-XX-7686, automotive paint spray booths

THIS PERMIT IS GRANTED SUBJECT TO ALL RULES AND REGULATIONS OF THE COLORADO AIR QUALITY CONTROL COMMISSION AND THE COLORADO AIR QUALITY CONTROL ACT C.R.S. (25-7-101) et seq). TO THOSE GENERAL TERMS AND CONDITIONS SET FORTH ON THE REVERSE SIDE OF THIS DOCUMENT AND THE FOLLOWING SPECIFIC TERMS AND CONDITIONS:

1. Visible emissions shall not exceed twenty percent (20%) opacity.

2. This source is subject to the odor requirements of Regulation No. 2.

3. The permit number shall be marked on the subject equipment for ease of identification.

4. The manufacturer, model number and serial number of the subject equipment shall be provided to the Division prior to Final Approval.

5. The spray booths shall be equipped with exhaust filters or paint arresters to control emissions of particulate matter.

6. Construction of this source must commence within 18 months of initial approval permit issuance or within 18 months of the start-up date stated in the application. If commencement does not occur within the stated time the permit will expire on_____
(See General Condition No. 6., Item 1 on the reverse side of the first page of this permit.)

013/9999/999

SAMPLE DRAFT PERMIT

7. This source shall be limited to a maximum consumption rate as listed below and all other activities, operational rates and numbers of equipment as stated in the application. Annual records of the actual consumption rate shall be maintained by the applicant and made available to the Division for inspection upon request.

Primers:	150 gallons per year
Enamel Paints:	140 gallons per year
Lacquers:	40 gallons per year
Thinners*:	180 gallons per year
Reducers:	140 gallons per year
Hardeners:	130 gallons per year

* Includes cleanup solvents

8. Emissions of air pollutants shall not exceed the following limitations (as calculated in the Division's preliminary analysis):

Particulate Matter:	0.2 ton per year and 0.4 pound per hour
Particulate Matter < 10 μm (PM_{10}): . .	0.2 ton per year and 0.4 pound per hour
Volatile Organic Compounds:	2.3 tons per year and 3.8 pounds per hour

Note to Permit Holder:

The following emissions of hazardous air pollutants are estimated based upon the coating and solvent consumptions as indicated in Condition No. 7. This information is listed to inform the operator of the Division's analysis of the specific compounds. This information is listed on the Division's emission inventory system.

CAS No.	Pollutant	Emissions, lb/yr
78-93-3	Methyl Ethyl Ketone	79
108-88-3	Toluene	588
1330-20-7	Xylene	344
108-10-1	Methyl Isobutyl Ketone	48
100-41-4	Ethyl Benzene	105
GLYET	Glycol Ethers	32

9. High Volume Low Pressure (HVLP) paint spray guns or other Division-approved surface coating method shall be used for any application of base coats and clear coats in general, and for any top coat applied to a large area. (A large area is any area greater than nine (9) square feet.) The applicant must obtain written permission from the Division prior to using any method other than HVLP application for applying base coats, clear coats or large area top coats. Conventional application methods may be used only in small area applications as defined above.

SAMPLE DRAFT PERMIT

10. Fugitive emissions shall be controlled by the following practices:

    a. Control techniques and work practices shall be implemented at all times to reduce volatile organic compound (VOC) emissions from fugitive sources. Control techniques and work practices include, but are not limited to:

        (i) tight-fitting covers for open tanks;
        (ii) covered containers for solvent wiping cloths;
        (iii) proper disposal of dirty clean-up solvent.

    b. Emissions of organic material released during clean-up operations, disposal, and other fugitive emissions shall be included when determining total emissions, unless the source owner or operator documents that the VOC's are collected and disposed of in a manner that prevents evaporation to the atmosphere.

11. Waste solvent shall be stored in a manner which prevents public access (i.e. locked drums, storage shed, etc.) in order to avoid release of toxic substances into the atmosphere.

12. At all times, including periods of start-up, shutdown, and malfunction, the facility and control equipment shall, to the extent practicable, be maintained and operated in a manner consistent with good air pollution control practices for minimizing emissions. Determination of whether or not acceptable operating and maintenance procedures are being used will be based on information available to the Division, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

13. A Revised Air Pollutant Emission Notice shall be filed when a significant change in emissions occurs, as required by Regulation No. 3.

14. In accordance with C.R.S. 25-7-114.1, the Air Pollutant Emission Notice (APEN) associated with this permit is valid for a term of five years. The five year term for this APEN expires on August 22, 1999. A revised APEN shall be submitted no later than 30 days before the five year term expires.

By: _____
One Concerned
Permit Engineer/Reviewer

By: _____
Dennis M. Myers, P.E.
Construction Permits Unit
Stationary Sources Program
Air Pollution Control Division

APPENDIX B

Automotive Refinishing APEN

AUTOMOTIVE REFINISHING PAINT SPRAY BOOTH

Air Pollution Emission Notice (APEN) - and - Application For Emission Permit

Company Name:_____ Ferderal Tax ID #:_____

'ness Location:_____ County:_____

.ng Address:_____ Zip Code:_____

Billing Address:_____ Phone Number: ( )_____

Person to Contact Regarding this Information:_____ FAX Number: ( )_____

Number of Employees: _____ Full Time _____ Part Time

General Nature of Business (Body Shop, Automobile Dealership, etc.)_____

Was facility operating (UNDER ANY OWNERSHIP) before Feb. 1972? _____ (If YES, provide WRITTEN proof.)

Is this facility owned or managed by another company or corporation? _____ (YES or NO)

If YES, provide name of company and mailing address:_____

SECTION 2

PAINT BOOTH INFORMATION

How many paint booths are operated at this location? _____

Are bodywork and painting done on the same premises? _____

For each spray paint booth, list the following information in the spaces provided below:

	Make	Model	Serial No.	Operating Hours of Booth (Hrs. per Wk.) *
Booth #1				
Booth #2				
Booth #3				

* Note: "Operating Hours of Booth" refers to number of hours VOC's are emitted (includes spraying, drying, cleanup of spray guns, etc.). If booth is used by anyone besides owner (i.e., timeshare,etc.), include all time booth is used

	Type Booth (Solid Rear Wall, Drive Through, Reverse Flow, Downdraft, Other...SPECIFY)	Application Method(s) (Air Atomized, Conventional Spray, HVLP, Other...SPECIFY)	Drying Method(s) (Air Dried, Oven Assisted, Other...SPECIFY)
Booth #1			
Booth #2			
Booth #3			

(IF THERE ARE MORE THAN 3 PAINT BOOTHS, PLEASE CONTINUE LIST ON A SEPARATE SHEET.)

SECTION 3

STACK INFORMATION

For each paint booth vented directly to the outside, please supply the following information about the stack (vent):

	Stack Height from Ground (Feet)	Stack Diameter (Feet & Inches)	Air Flow Rate (ACFM)
Booth #1			
Booth #2			
Booth #3			

(IF THERE ARE MORE THAN 3 PAINT BOOTHS, CONTINUE LIST ON A SEPARATE SHEET.)

The Air Division Will Fill Out This Section:

City ID	AQCR	Plant #	Point #	Date	UTM Coordinates		SIC
					____-_	____-_	

PERMIT NO._____

SECTION 4

DRYING OVEN INFORMATION

For each drying oven, fill in the information in the spaces provided below:

	Make	Model	Serial Number	Type Fuel Used (Nat. Gas, Oil, etc.)	Annual Fuel Consumption	Hourly Design Rating (Million BTU/hour Heat Input)
Oven #1						
Oven #2						

(IF THERE ARE MORE THAN 2 DRYING OVENS, PLEASE CONTINUE LIST ON A SEPARATE SHEET.)

SECTION 5

AIR POLLUTION CONTROL EQUIPMENT

	Overspray Controls:			VOC Controls:	
	Overspray Control (Filters, Water Wall, Other...SPECIFY)	Are Exhaust Filters In Good Condition? (Yes or No)	How Often Are Filters Changed?	Which Paint Booths or Ovens Have VOC Controls?	Type of Control Used: (Carbon Bed, Incinerator, Other...SPECIFY)
Booth #1					
Booth #2					
Booth #3					

SECTION 6

The Material Consumption Stated In This Section Will Be Used To Determine If A Permit Is Required And Will Be Used As The Material Usage Limits On Your Permit (If One Is Required).

VOLATILE MATERIAL USAGE

(Please Note If Any Of These Products Are Waterborne Or Low VOC)

COLOR AND CLEAR MATERIALS	Annual Consumption (Amount Used: gallons)	SUPPORT PRODUCTS	Annual Consumption (Amount Used: gallons)
Base coat/Clearcoat Enamels		Enamel Reducers	
Other Enamel Products		Hardeners	
Acrylic Lacquer Products		Lacquer Products (Thinners, etc.)	

Thinners & Clean Up Solvents: Amount Used: (_____ Gal./Yr.). Amount Sent Out As Waste: (_____ Gal./Yr.)
Amount Recycled In-House: (_____ Gal./Yr.)

Other(s) Please Specify: Product:_____ Usage: (_____ Gal./Yr.)

Are Coatings, Solvents and Waste Containers Sealed? (Yes or No) _____

Are Spray Guns Cleaned In A Manner Which Prevents Excess Emissions? (Yes or No) _____

Describe Method _____

How Are Wastes Disposed? _____

Comments: _____

Signature: _____ Date: ____/____/____

Print Name: _____

Mail to: Colorado Department of Health
A.P.C.D.
4300 Cherry Creek Drive South
Denver, Colorado 80222

(303) 692-3100

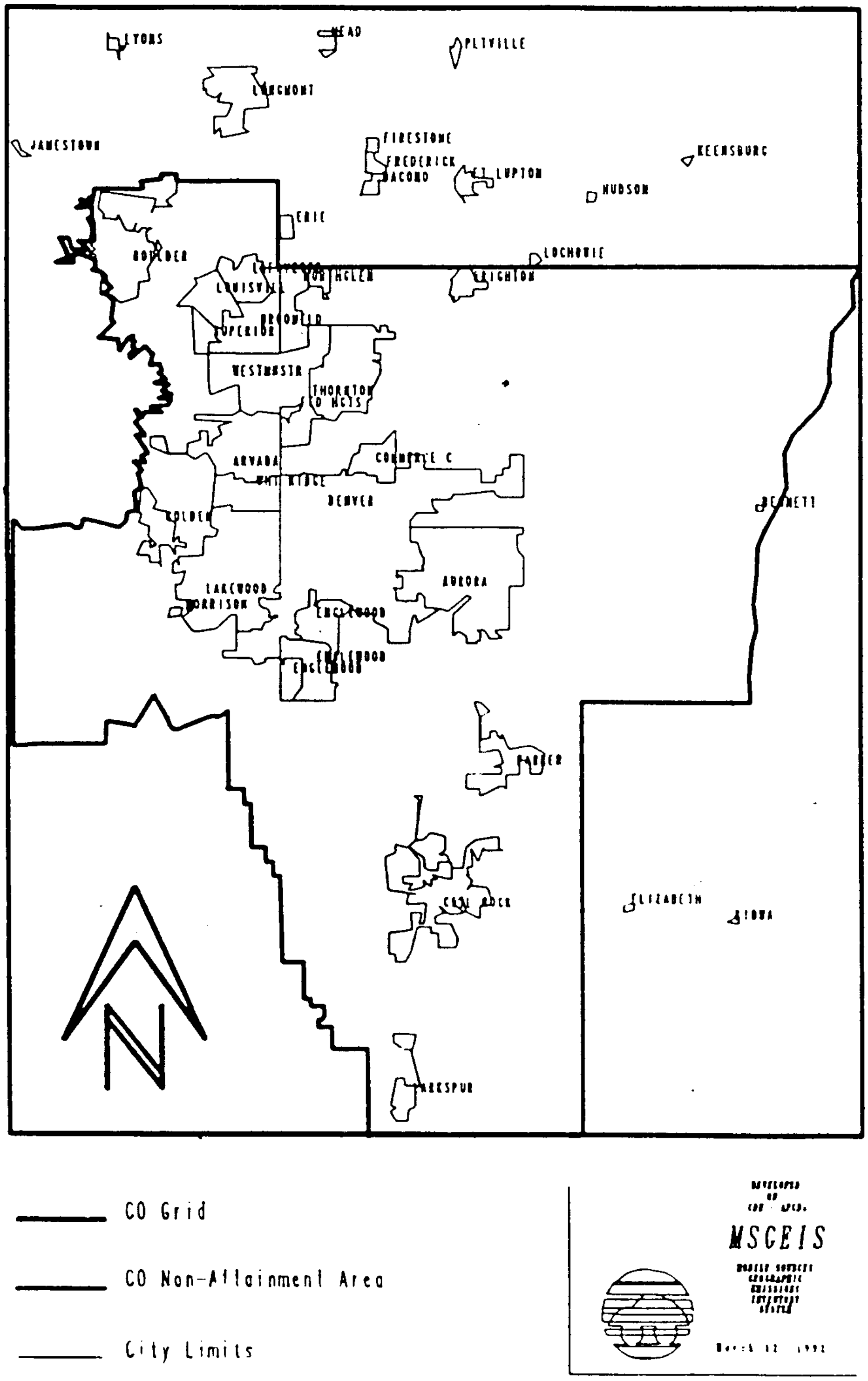
Please Enclose $100.00
Filing Fee With Application

APPENDIX C

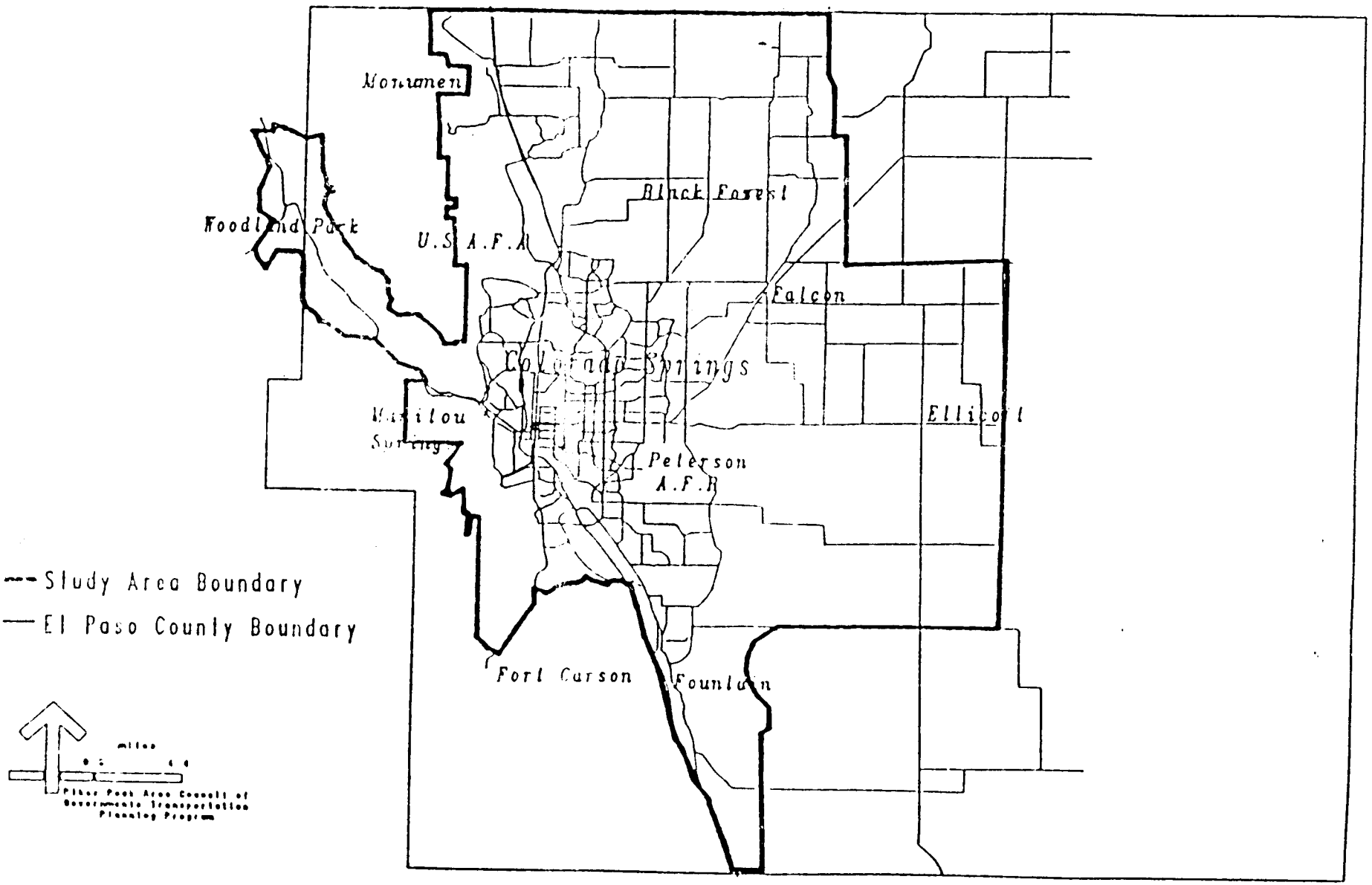
Maps of Nonattainment areas

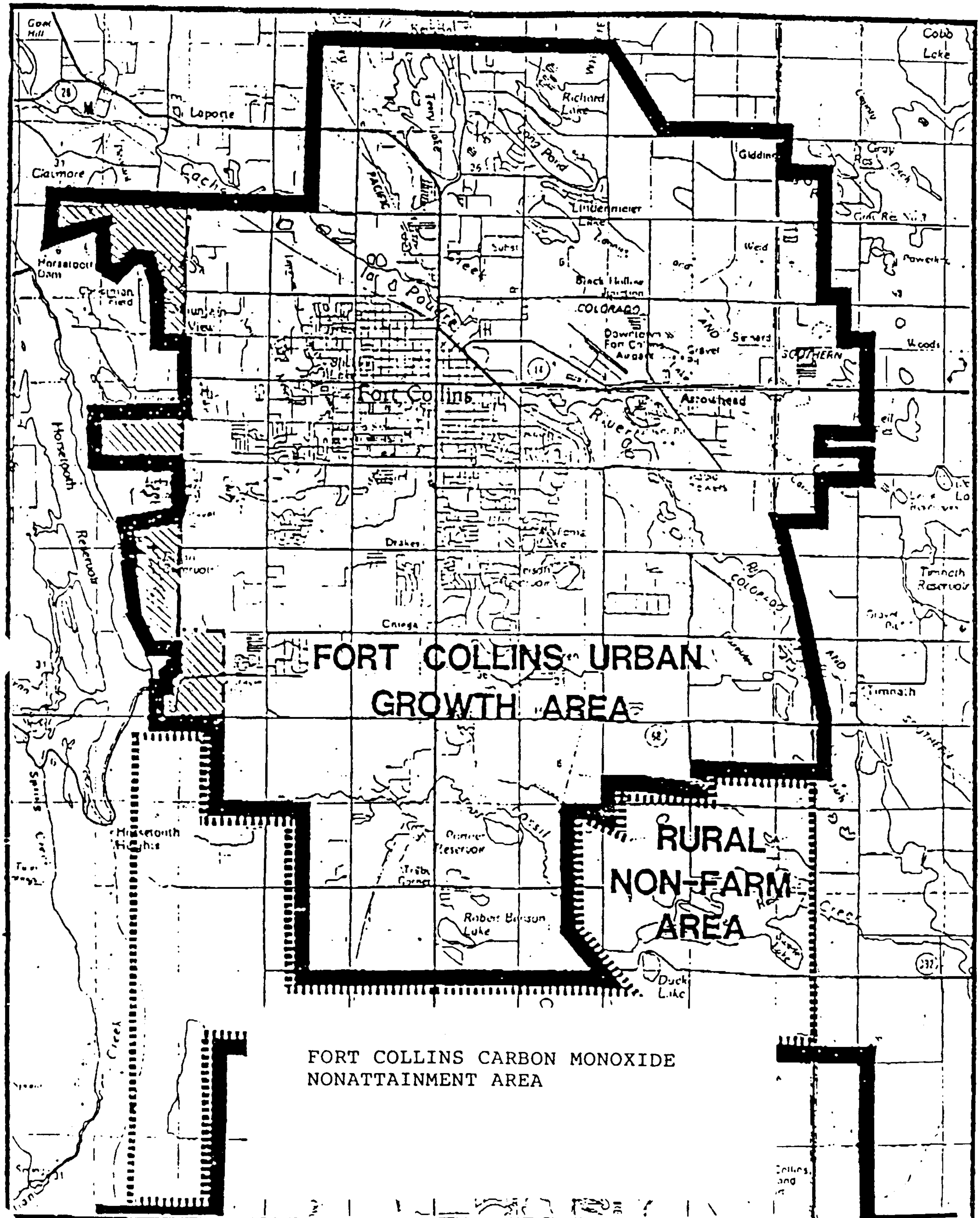
Note: The nonattainment area boundaries change from time to time. Call the Air Pollution Control Division at (303) 692-3150 to verify if your shop is located in a nonattainment area.

CO Non-Attainment Area



NONATTAINMENT AREA FOR THE PIKES PEAK REGION
CARBON MONOXIDE

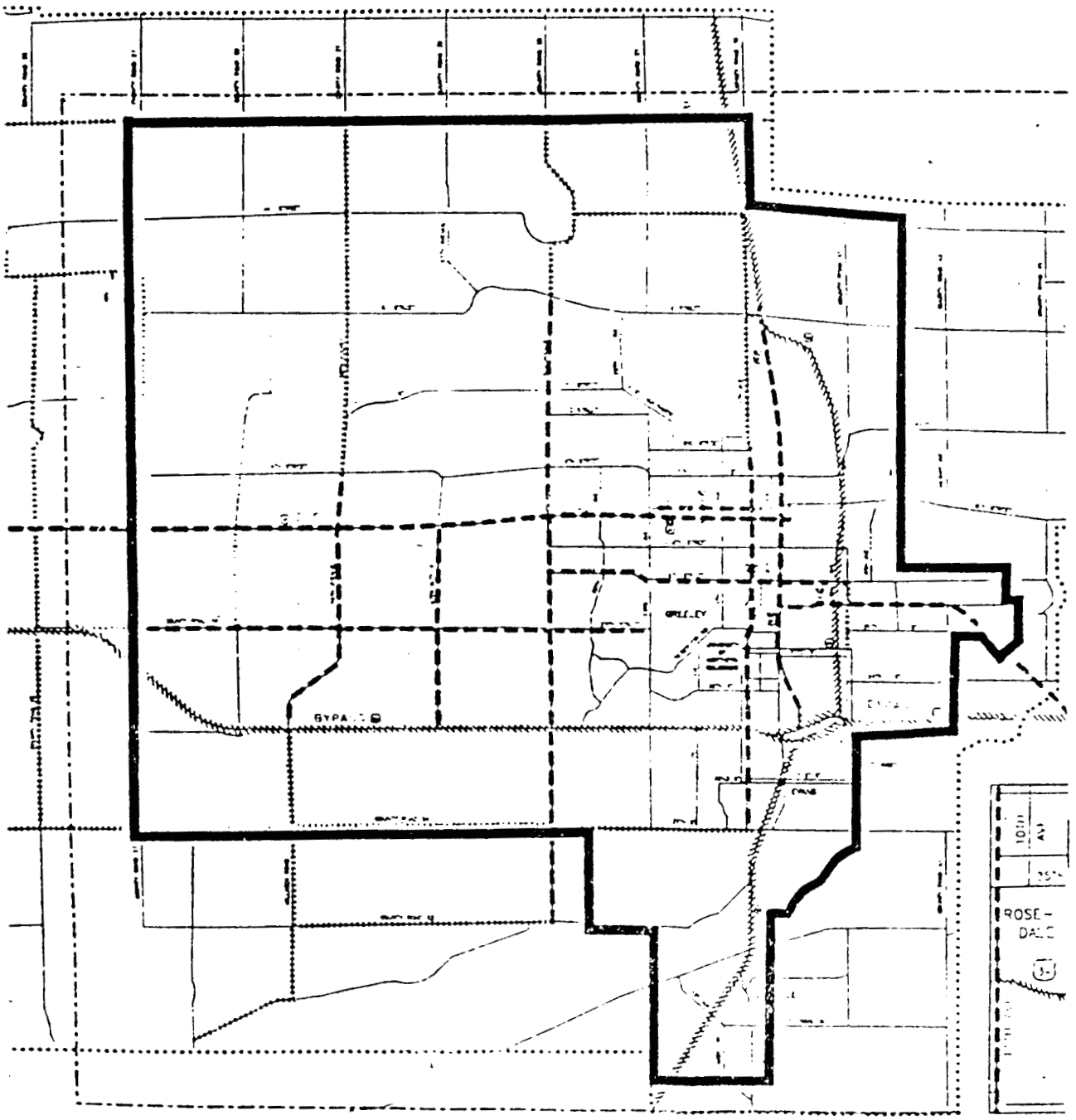


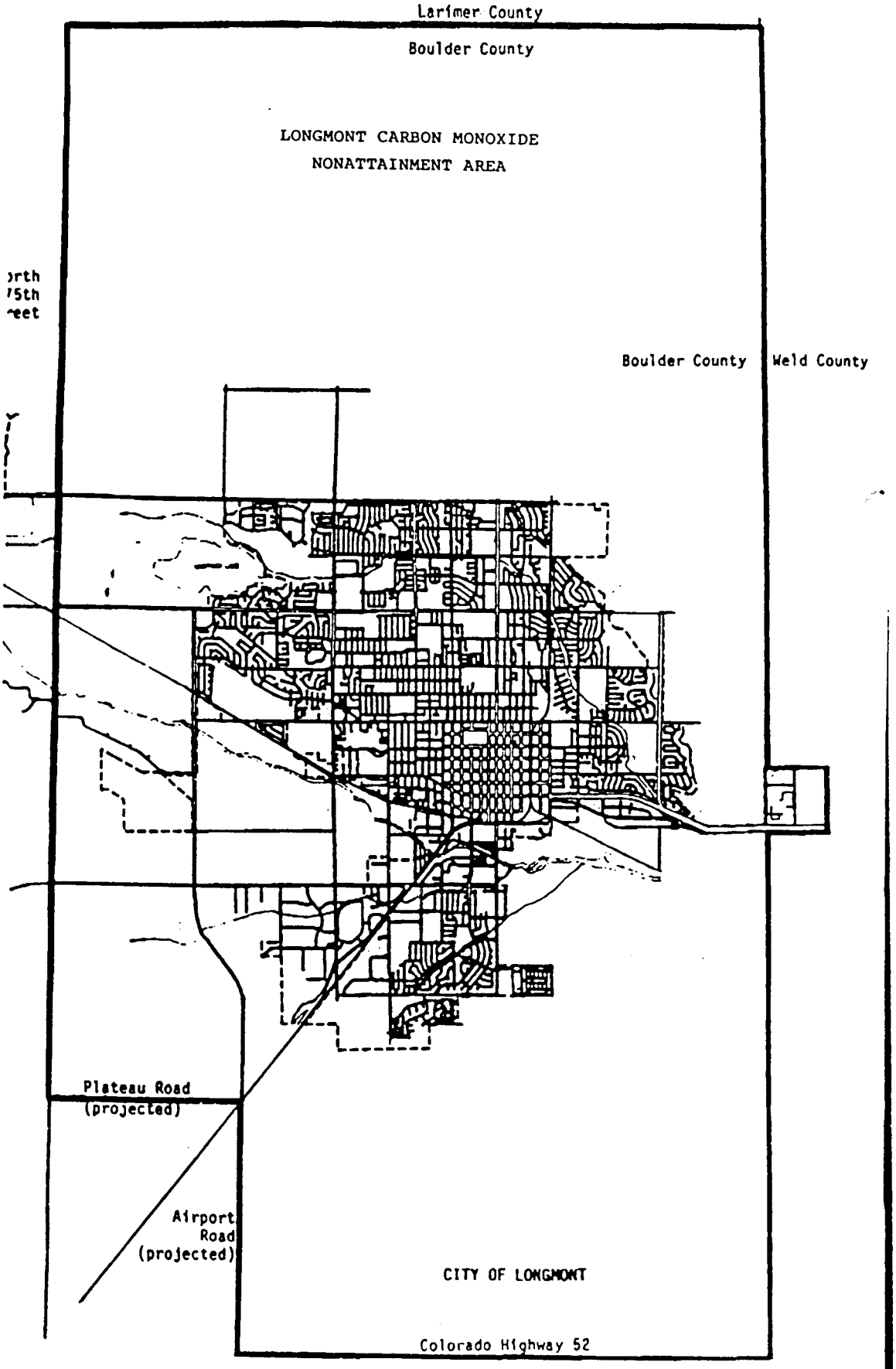


LARIMER COUNTY PLANNING AND ZONING

Fort Collins Urban Growth Area

Greeley Carbon Monoxide
Nonattainment Area




Larimer County
Boulder County
LONGMONT CARBON MONOXIDE
NONATTAINMENT AREA
orth
75th
eet
Boulder County
Weld County
Plateau Road
(projected)
Airport
Road
(projected)
CITY OF LONGMONT
Colorado Highway 52

PM10

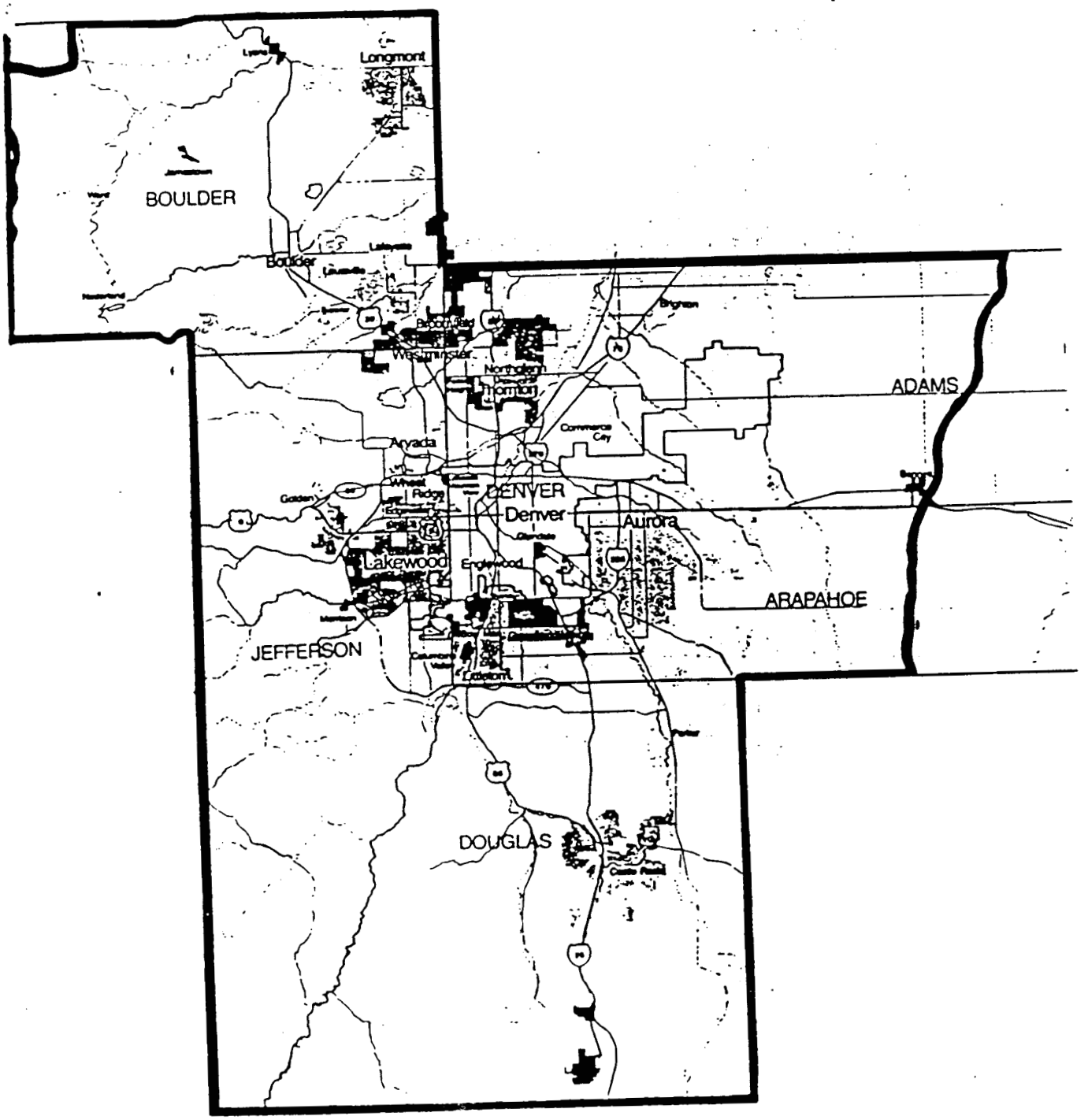
Area	Classification	Boundary
Denver Metro	Moderate	All of Denver, Jefferson, and Douglas Counties; Boulder County (excluding Rocky Mountain National Park) and the Automobile Inspection and Readjustment Program portions of Adams and Arapahoe Counties. See attached map.
Routt County	Moderate	Steamboat Springs Area Airshed as adopted by the Routt County Commissioners May 28, 1991. See Attached map.
Archuleta County	Moderate	Attached Map
San Miguel County	Moderate	Attached Map
Pitkin County	Moderate	Attached Map
Fremont County	Moderate	Attached Map
Prowers County	Transitional	Lamar City Limits as of July 30, 1991.

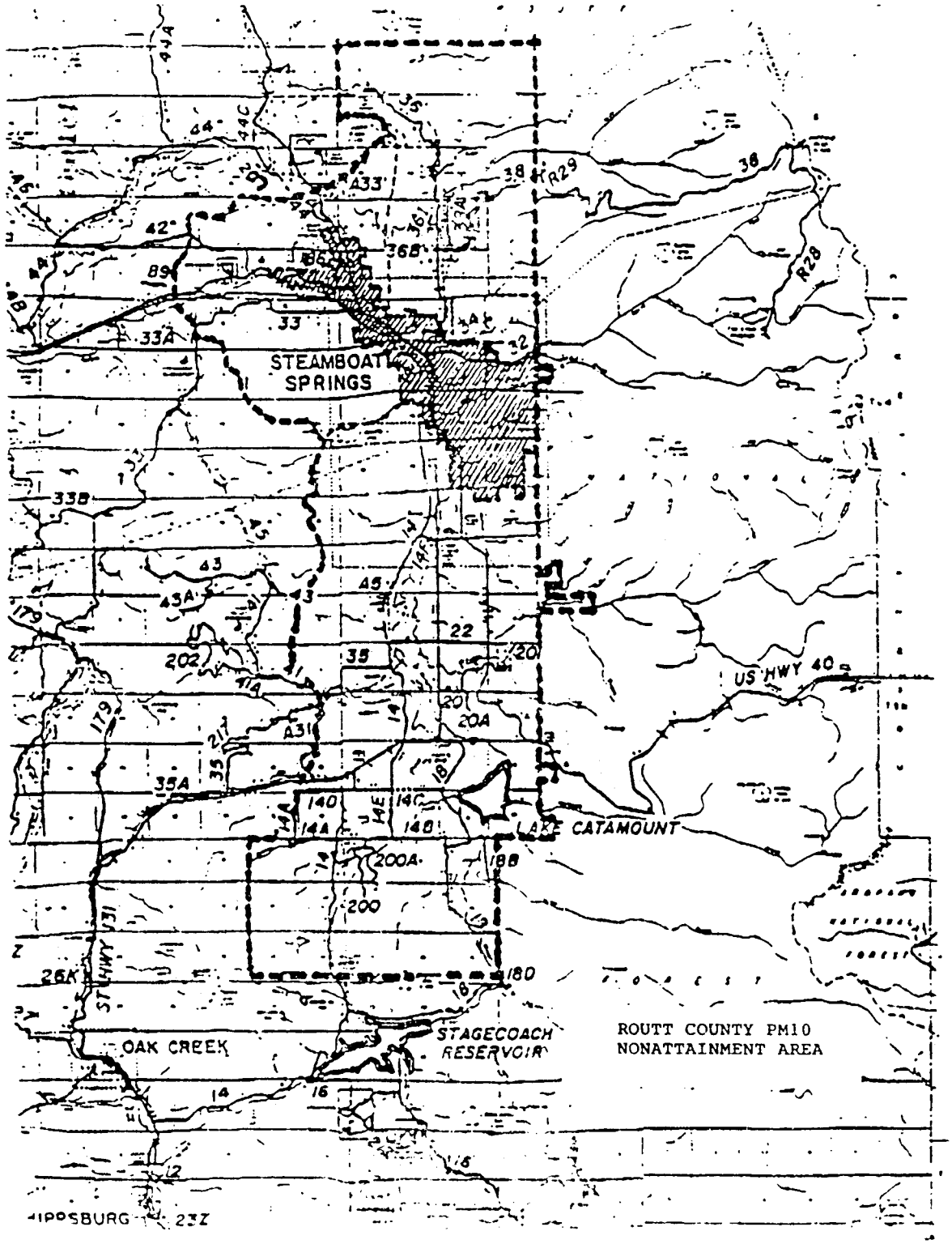
Ozone

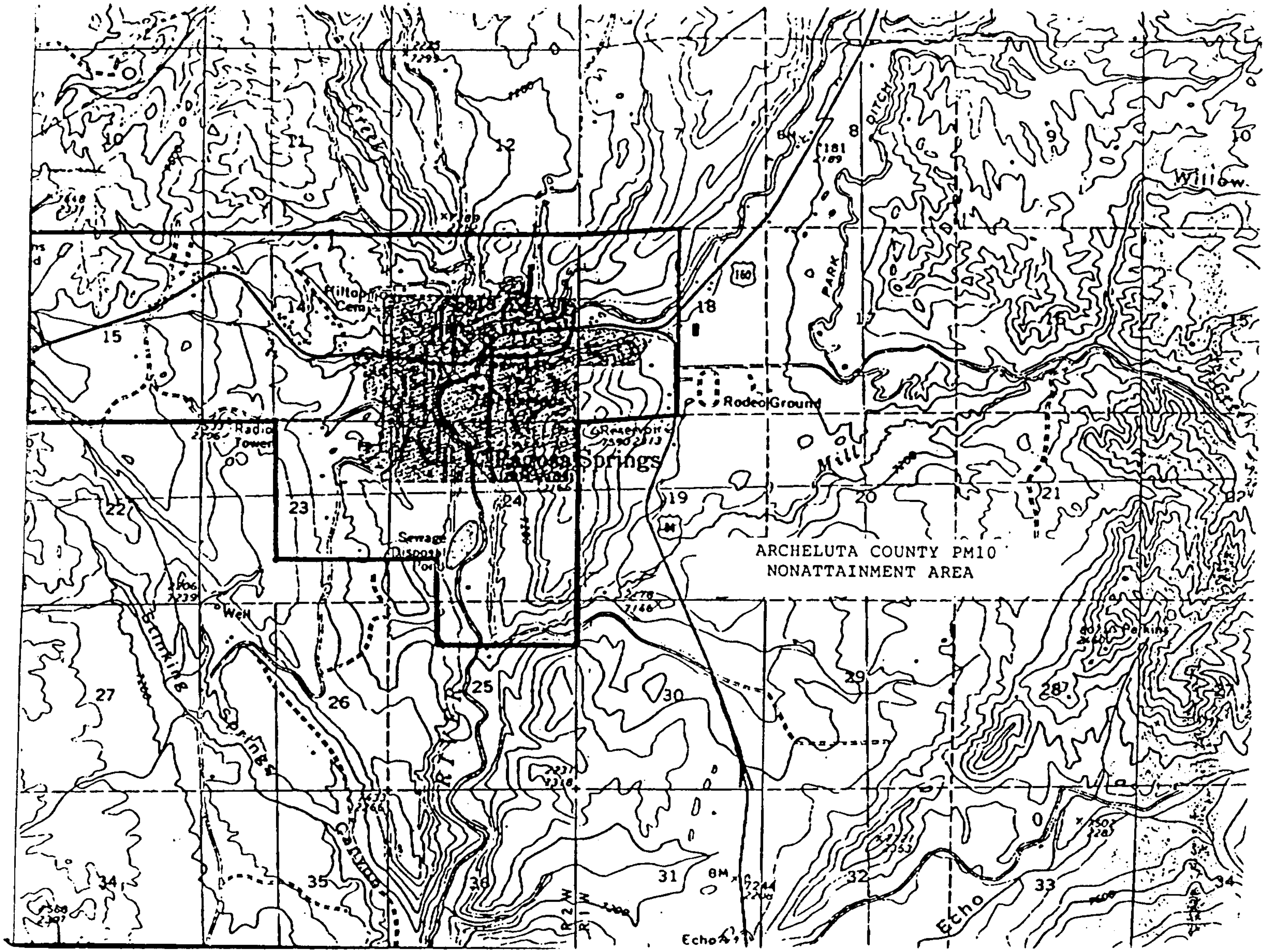
Area	Classification	Boundary
Denver Metro Area	Transitional	All of Denver, Jefferson, and Douglas Counties; Boulder County (excluding Rocky Mountain National Park) and the Automobile Inspection and Readjustment Program portions of Adams and Arapahoe Counties. See attached map.

BOUNDARIES FOR DENVER NONATTAINMENT AREA

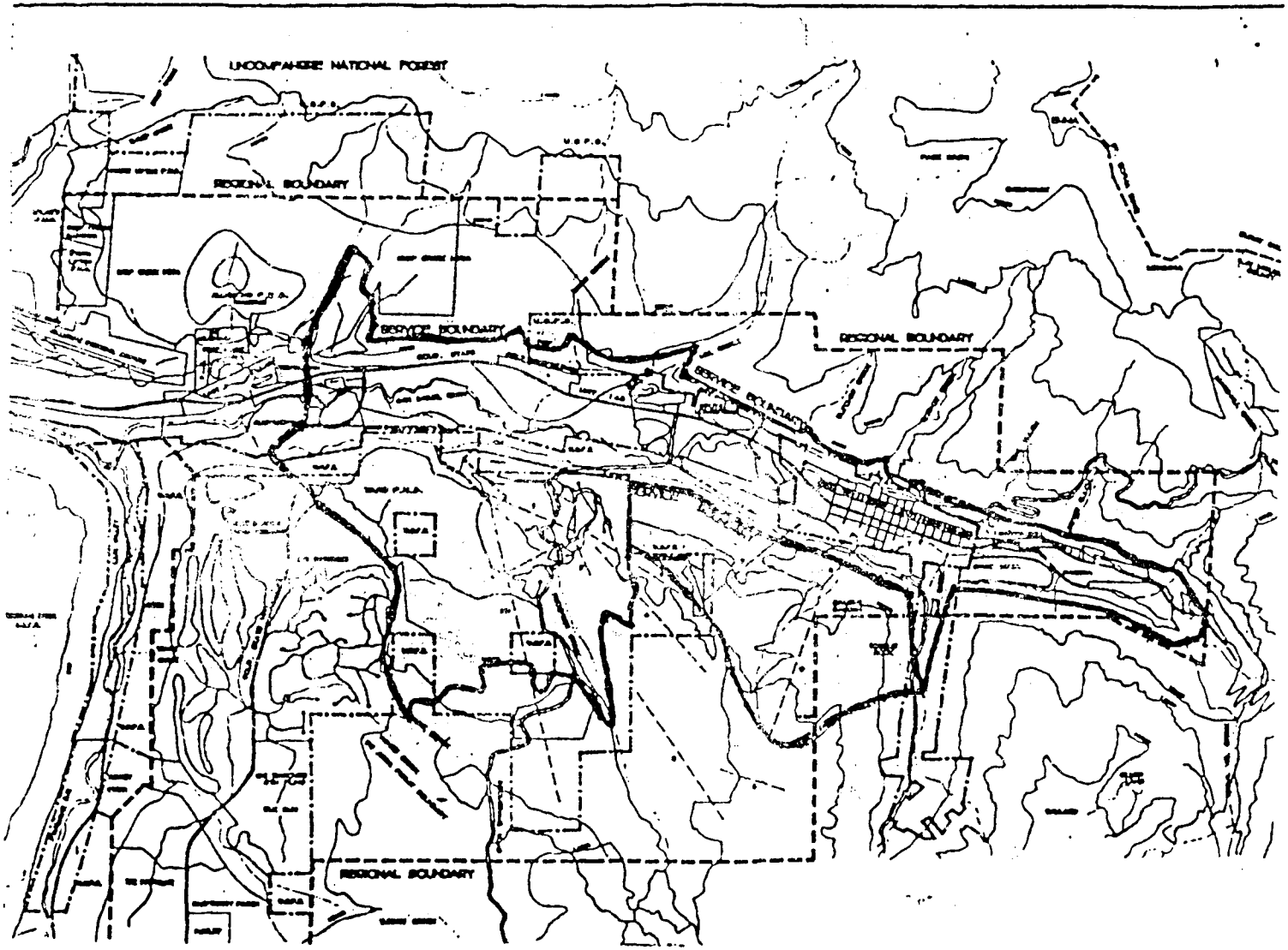
-- Ozone and PM-10 --

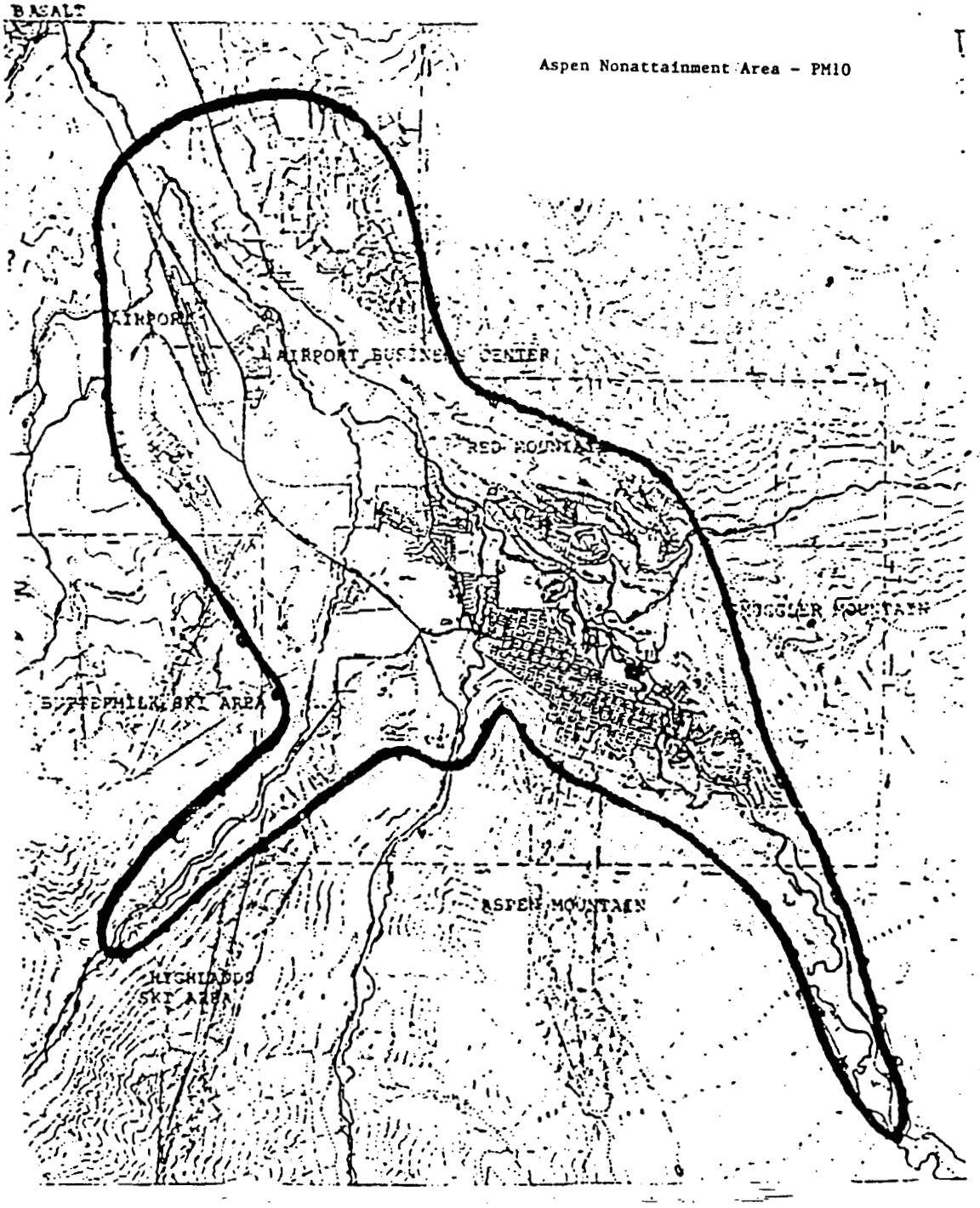


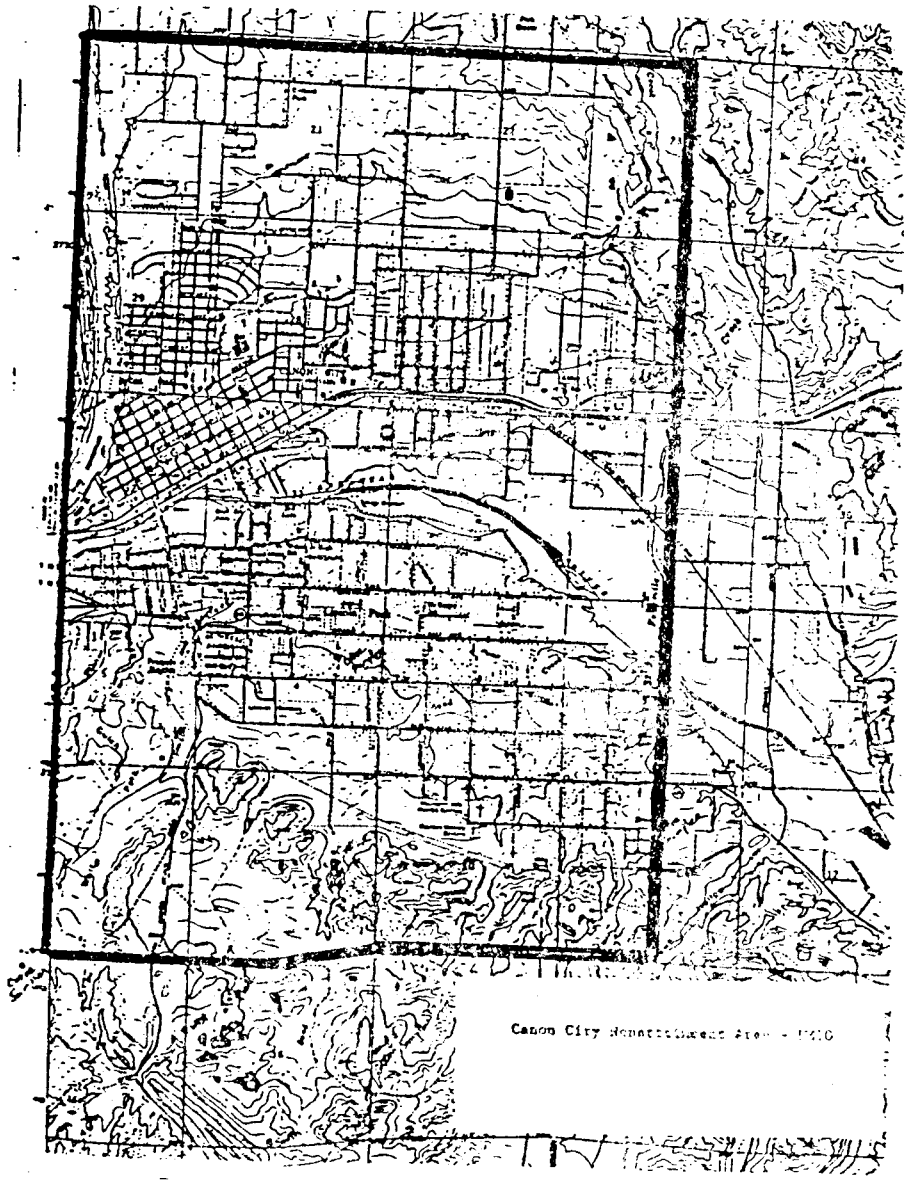

STEAMBOAT SPRINGS
LAKE CATAMOUNT
US HWY 40
OAK CREEK
STAGECOACH RESERVOIR
ROUTT COUNTY PM10
NONATTAINMENT AREA
HIPPSBURG 23Z


ARCHELUTA COUNTY PM10
NONATTAINMENT AREA
Rodeo Ground
Springs
Radio Tower
Sewage Disposal
Well
Willow
Echo
Canyon
Mill
PARK
DITCH
Hilltop Cem.
Reservoir

SAN MIGUEL COUNTY PM10 NONATTAINMENT AREA




BASALT
Aspen Nonattainment Area - PM10
AIRPORT
AIRPORT BUSINESS CENTER
RED MOUNTAIN
ASPEN MOUNTAIN


Canon City Homesteaded Area - 1910