Appendix PT

Application Equipment

1. Each owner or operator shall comply with the application requirements specified in 40 CFR 63.745(f)(1). The permittee has chosen to use the high volume, low pressure method of spraying to comply with this requirement. Other methods specified in 63.745(f)(1) may be used under the alternate operating method scenario.
   [40CFR 63.745(f), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

2. All application devices used to apply primers or topcoats shall be operated in accordance with company procedures, local specified operating procedures, and/or the manufacturer's specifications, whichever is more stringent. Equipment modified by the facility shall maintain a transfer efficiency equivalent to HVLP and electrostatic spray application techniques.
   [40CFR 63.745(f)(2), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

3. Exemptions to the use of HVLP requirement or to the alternate operating scenario method shall be in accordance with 40 CFR 63.745(f)(3).
   [40CFR 63.745(f)(3), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

Emission Limitations and Standards (Inorganic HAP from Primer/Topcoat Application Operations)

4. Coatings shall be applied in which the airflow is directed downward onto or across the part or assembly being coated and exhausted through one or more outlets.
   [40 CFR 63.745(g)(1), Rule 62-204.800, FAC, and Rule 2.210, JEPB]

5. The owner/operator shall only perform the coating operation in the enclosed area. The air stream from the coating area shall be passed through a dry particulate filter system prior to discharge to the atmosphere. The dry particulate filter system shall be certified using the method described in 40 CFR 63.750(o) to meet or exceed the efficiency data points listed in Tables 1 and 2 of 40 CFR 63.745. Tables 1 and 2 are attached to the permit and are part of the permit.
   [40 CFR 63.745(g)(2)(i)(A), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

6. The dry particulate filter system shall meet and be used in accordance with the following requirements:
   (A) Maintain the system in good working order
   (B) Install a differential pressure gauge across the filter banks
   (C) Continuously monitor the pressure drop across the filter, and read and record the pressure drop once per shift
   (D)Take corrective action when the pressure drop exceeds or falls below the manufacturer's recommended limits
   [40CFR 63.745(g)(2)(iv), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

7. If the pressure drop as recorded pursuant to 40 CFR 63.752(d)(1) falls outside the manufacturer's limit and/or the manufacturer's maintenance procedures for the dry particulate filter system have not peen performed as scheduled then the operation shall be shut down immediately and corrective action taken. The operation shall not be restarted until the pressure drop is returned within specified limits and corrective action taken.
[40CFR 63.745(g)(3), 40 CFR 63.752(e)(7), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

8. Operations listed in 40 CFR 63.745(g)(4) are exempt from the control requirements listed above.
[40CFR 63.745(g)(4), 40 CFR 63.752(e)(7), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

Test Methods and Procedures (Inorganic HAP from Primer/Topcoat Application Operations)

9. Dry particulate filter certifications shall be performed in accordance with methods, procedures and requirements specified in 40 CFR 63.750(o).
[40 CFR 63.750(o), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

Compliance Determinations (Primer/Topcoat Application Operations, Inorganic Hap)

10. Compliance with the primer and topcoat inorganic emissions shall be determined by the procedures, methods, and conditions specified in 40 CFR 63.749(e)(1 and 2).
[40 CFR 63.749(e), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

Monitoring (Primer/Topcoat Application Operations, Inorganic Hap)

11. While primer or topcoat operations are occurring the owner/operator shall continuously monitor the pressure drop across the dry particulate filter system; and read and record the pressure drop once per shift following the recordkeeping requirements of 40 CFR 63.752(d).
[40 CFR 63.751(c), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

Recordkeeping Requirements (Primer/Topcoat Application Operations, Inorganic Hap)

12. The owner/operator shall record the pressure drop across the dry particulate filter system once each shift in which the coating operation occurs.
[40 CFR 63.752(d)(1), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

13. The owner/operator shall maintain a log of the recorded pressure drop(s). The log shall include the acceptable limit(s) of pressure drop as specified by the filter or booth manufacturer.
[40 CFR 63.752(d)(3), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

Emission Limitations and Standards (Primer/Topcoat Application Operations) Organic HAP Uncontrolled Coating

14. The owner/operator shall conduct the handling of primers and topcoats to or from containers, tanks, vats, vessels, and piping systems in such a manner that minimizes spills.
[40CFR 63.745(b), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

15. Organic HAP emissions from primers shall be limited to an organic HAP level of no more than 350 g/L (2.9 lbs/gal) of primer (less water) , as applied. Organic HAP emissions from topcoats (including self priming topcoats) shall be limited to an organic HAP level of no more than 420 g/L (3.5 lbs/gal) of topcoats (less water) , as applied.
[40CFR 63.745(c), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

16. VOC emissions from primers shall be limited to a VOC level of no more than 350 g/L (2.9 lbs/gal) of primer (less water and exempt solvents), as applied. VOC emissions from topcoats (including self priming topcoats) shall be limited to a VOC level of no more than 420 g/L (3.5 lbs/gal) of primer (less water and exempt solvents), as applied.
[40CFR 63.745(c), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

17. The owner/operator shall conduct the handling and transfer, of all wastes produced from this operation which may contain HAP materials, to and from containers, tanks, vats, vessels, and piping systems in such a manner that minimizes spills.
[40 CFR 63.748, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

Test Methods and Procedures (Organic HAP from Primer/Topcoat Application Operations)

18. Organic HAP content level determination for compliant primers shall be determined by the procedures, methods, and conditions specified in 40 CFR 63.750(c).
[40 CFR 63.750(c), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

19. VOC content level determination for compliant primers shall be determined by the procedures, methods, and conditions specified in 40 CFR 63.750(e).
[40 CFR 63.750(e), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

Compliance Determinations (Primer/Topcoat Application Operations, Organic Hap)

20. Compliance with the primer and topcoat HAP and VOC limits shall be determined by the procedures, methods, and conditions specified in 40 CFR 63.749(d)(1) through 40 CFR 63.749(d)(4)(iv).
[40 CFR 63.749(d), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

Recordkeeping Requirements (Primer/Topcoat Application Operations, Organic Hap)

21. The owner or operator shall record the following information:

    a. The name and VOC content as received and as applied of each primer and topcoat used at the facility.
    b. The mass of organic HAP emitted per unit volume of coating as applied (less water) (Hi) and the mass of VOC emitted per unit volume of coating as applied (less water and exempt solvents) (G_i) for each coating formulation within each coating category used each month (as calculated using the procedures specified in 40 CFR 63.750(c and e)
    c. All data, calculations, and test results (including EPA Method 24 results) used in determining the values of G_i and H_i
    d. The volume (gallon) of each coating formulation within each coating category used each month. Data for low HAP content primers shall be recorded in accordance with the procedures specified in 40 CFR 63.752(c)(3)

Reporting Requirements (Primer/Topcoat Application Operations, Organic and Inorganic HAP)

22. The owner/operator shall submit semi-annual reports (every 6 months) for the period(s) September 1 through February 28 or 29, and March 1 through August 31. The reports shall be due May 1 for the September through February reporting period and November 1 for the March through August reporting period. The reports shall contain the following information:

    (a) Each value of H_i and G_i as recorded under 40 CFR 63 752(c)(2)(i) that exceeds the applicable organic HAP or VOC limit specified in 40 CFR 63 745(c)
    (b) All times when the operation was not shut down immediately when the pressure drop across a dry particulate filter system was outside the limit(s) specified by the filter manufacturer.
    (c) If the coating operation has been in compliance for the reporting period a statement signed by the responsible official stating that the operation was in compliance with the applicable standards

    [40 CFR 63.753(c)(1), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

23. The owner/operator shall submit annual reports (every 12 months) for the period September 1 through August 31. The reports shall be due November 1 each year. The reports shall list the number of times the pressure drop was outside the limit(s) specified by the filter manufacturer.
    [40 CFR 63.753(c)92, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

Compliance Determinations (Waste Operations)

24. Compliance with the handling and storage of waste operations is determined by adherence to the requirements of 40 CFR 63.748. Failure to adhere to those requirements shall be considered a violation.
    [40 CFR 63.749(i), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

Table 1—Two-Stage Arrestor; Liquid Phase Challenge for Existing Sources

Filtration efficiency requirement, %	Aerodynamic particle size range, µm
>90	>5.7
>50	>4.1
>10	>2.2

Table 2—Two-Stage Arrestor; Solid Phase Challenge for Existing Sources

Filtration efficiency requirement, %	Aerodynamic particle size range, µm
>90	>8.1
>50	>5.0
>10	>2.6

40 CFR 63.745

S:\PermitV\TVOP\Final\0310215-040Appendix PT-AV