Form No. 77  3/30/2005

Southwest Clean Air Agency

GENERAL RECOMMENDATIONS/REQUIREMENTS FOR SURFACE COATING OPERATIONS

1. SPRAY BOOTH: New surface coating operations within SWCAA’s jurisdiction require an enclosed spray booth/room capable of capturing overspray and associated emissions. All surface coating shall be conducted inside the spray booth/room. The spray booth exhaust system shall be in operation at all times during surface coating. Minor touch-up work and/or surface coating of objects too large to fit within a spray booth may be conducted outside the spray booth on a limited basis. When surface coating objects too large to fit inside of a spray booth/room, a temporary enclosure (tarps, wind shrouds, etc.) must be used to minimize fugitive emissions to the atmosphere.

2. EXHAUST STACK SPECIFICATIONS: The spray booth/room exhaust system shall be vertically discharged to the atmosphere. The discharge point of the exhaust system shall be located at least three feet above the peak height of surrounding roofs. There shall be no flow obstruction at the point of discharge that inhibits vertical dispersion (i.e., rain cap, elbow, etc.). Exhaust stack configurations designed to prevent rain infiltration are generally acceptable provided the configuration does not obstruct vertical discharge. Examples of acceptable configurations are provided below in Figure 1.

3. SPRAY BOOTH FILTERS: Spray booth exhaust air shall be filtered to remove particulate overspray. Filters shall be inspected on a regular basis and shall be replaced whenever damaged or loaded with particulate build-up to an extent that jeopardizes the effectiveness of the spray booth in capturing and controlling emissions. Filters shall be properly seated in the filter assembly and cover all openings to the exhaust system. A pressure gauge capable of monitoring pressure drop across the filter media shall be installed and maintained on each spray booth.

4. MATERIAL USAGE RECORDS: Material usage records shall be maintained and updated on a monthly basis. Records shall be sufficient to verify the actual monthly amounts in gallons or pounds of materials used which contain volatile organic compounds (VOC materials). At a minimum, such records shall include purchase invoices indicating the amount of the VOC material purchased corresponding product identification and the date of purchase. Monthly records shall be retained at the facility for at least two years and shall be made available to SWCAA upon request.

5. OPERATION & MAINTENANCE: All spray coating operations shall take reasonable measures and precautions to minimize volatile emissions. This includes, but is not limited to, the following:
   a. Storing all VOC containing coating material in closed air-tight containers when not in active use – keep lids on containers.
   b. Storing all solvents, solvent containing clothes, and/or other material used for surface preparation in closed air-tight containers when not in active use or awaiting disposal.
   c. Minimizing and promptly cleaning up spills/leaks of VOC containing materials.
   d. Using low VOC coatings and solvents when suitable and required by regulation.
   e. Conducting surface coating operations only in approved spray booths, except for minor touch-up work (max 9 sq ft).
   f. Operating spray booth exhaust/ventilation systems at all times during surface coating operations.

FIGURE 1: Acceptable weatherproof exhaust systems: