

Air Quality Inspection Checklist for Automotive Coatings Facility

Facility Name: _____			
Facility Location: _____		Facility ID #: _____	
Inspector: _____		Permit #: _____	
Facility Representative: _____		Phone #: _____	
Date: _____	Start time: _____	End time: _____	_____

This checklist is to be used in combination with the applicable permit, and is not intended for use on its own.

1. Reason for inspection:

- | | |
|--|--|
| <input type="checkbox"/> Permit Handoff | <input type="checkbox"/> Follow-up Inspection (i.e., regarding NTC, NOV, permitting, etc.) |
| <input type="checkbox"/> Initial Inspection (i.e., Compliance Assistance Inspection) | <input type="checkbox"/> Complaint Response |
| <input type="checkbox"/> Scheduled Inspection | <input type="checkbox"/> Other (explain below): _____ |

2. PTC Exemption

Has DEQ issued a PTC exemption to this facility?

YES:

- Date of DEQ Exemption Concurrence Letter: _____ *Note: Exemption Letters are not specifically required by the Rules.*
- Verify compliance with the Exemption Criteria appearing in Exemption Letter.

Indicate whether the facility is in or out of compliance and explain how the compliance status was determined with the exemption criteria:

In Compliance Out of Compliance

NO: Continue with the inspection.

3. Emission Limits

Emissions Limits

Note: In the absence of any other credible evidence, compliance with the emissions limits is assured by complying with permitted operating, monitoring, and recordkeeping requirements.

Opacity Limit

Note: Inspectors may use a See/No See observation as an indicator of whether to perform a formal Visible Emissions Evaluation pursuant to the procedures contained in IDAPA 58.01.01.625.

Indicate whether the facility is in or out of compliance and explain how the compliance status was determined with this permit condition:

In Compliance Out of Compliance Pending

Odors

Note: If necessary, Inspectors should rely on PM00-6: Procedures for Responding to Odor Complaints for investigating and otherwise determining odorous emissions.

Indicate whether the facility is in or out of compliance and explain how the compliance status was determined with this permit condition:

In Compliance Out of Compliance Pending

4. Operating Requirements

Permitted Fuel

Note: This condition only applies if the booth(s) is/are equipped with booth heaters.

Indicate whether the facility is in or out of compliance and explain how the compliance status was determined with this permit condition:

In Compliance Out of Compliance Pending

Prohibition From Using Methylene Chloride (MeCl) (CAS No. 75-09-2) to Remove Paint

Note: The permit is based on zero MeCl use; therefore, the facility should not have MeCl onsite, nor should it appear in their purchase records.

MeCl, like many other chemicals, have different chemical or trade names (e.g., Dichloromethane, Methylene Dichloride, Methylene bichloride, Methane dichloride, etc.); therefore, look out for these other common names and pay particular attention to the aforementioned CAS number when reviewing facility records.

Indicate whether the facility is in or out of compliance and explain how the compliance status was determined with this permit condition:

In Compliance Out of Compliance Pending

Coating Materials Use Limit

Note: If records are provided in units other than what is listed in the permit, it is the Inspector's responsibility to independently verify compliance with the material usage limit.

An optional daily recordkeeping form has been created by the Department and is available on the Department's website for use by automotive coating facilities.

Indicate whether the facility is in or out of compliance and explain how the compliance status was determined with this permit condition:

In Compliance Out of Compliance Pending

Spray Booth(s) and Preparation Station(s)

Note: *There is a similar requirement appearing in 40 CFR Part 63, Subpart HHHHHH.*

If the facility is painting a vehicle, whether in part (but still attached to the vehicle) or in its entirety, then painting must occur in a fully enclosed paint booth as defined in the permit.

If the facility is painting vehicle parts, products, or subassemblies, which are not attached to the vehicle, then painting can occur in either a fully enclosed paint booth or a preparation station as defined in the permit.

If the facility claims their "shop" is their paint booth or preparation station, then the Inspector will verify that painting is conducted inside the booth or preparation station with a filter system in place, with an exhaust fan operating, doors or curtain closed, and ventilated at negative pressure so that air is drawn into any openings.

All coating activities, regardless of application method (i.e., spraying, brushing, rolling, etc.), shall occur in the applicable booth or prep station.

Indicate whether the facility is in or out of compliance and explain how the compliance status was determined with this permit condition:

In Compliance Out of Compliance Pending

Spray Guns

Note: *There is a similar requirement appearing in 40 CFR Part 63, Subpart HHHHHH.*

If the spray gun bodies and nozzles ARE stamped with "HVLP", which HVLP guns generally will be, then no additional transfer efficiency verification is necessary.

If the spray gun bodies and nozzles ARE NOT stamped with "HVLP", then Inspectors will verify the transfer efficiency through the manufacturer's documentation.

Indicate whether the facility is in or out of compliance and explain how the compliance status was determined with this permit condition:

In Compliance Out of Compliance Pending

Filter System

Note: *There is a similar requirement appearing in 40 CFR Part 63, Subpart HHHHHH.*

Use the filter manufacturer's documentation to verify the minimum capture efficiency.

Indicate whether the facility is in or out of compliance and explain how the compliance status was determined with this permit condition:

In Compliance Out of Compliance Pending

5. Monitoring and Recordkeeping Requirements

Odor Complaints

Note: *It shall not be considered a violation if the facility does not have documentation of odor complaints because the facility has not received odor complaints.*

Indicate whether the facility is in or out of compliance and explain how the compliance status was determined with this permit condition:

In Compliance Out of Compliance Pending

Material Purchase Records and Material Data Safety Sheet

Note: *The facility shall have purchase records and MSDSs for all materials used in the coating operation.*

Indicate whether the facility is in or out of compliance and explain how the compliance status was determined with this permit condition:

In Compliance Out of Compliance Pending

Coating Materials Usage Recordkeeping

Note: *The permit does not specifically require the tabulation or totalizing of daily material usage; therefore, it shall not be considered a violation if the facility does not tabulate/totalize daily material usage.*

The inspector is responsible for independently verifying daily material usage and compliance with the daily material usage limit. Furthermore, if records are provided in units other than what is listed in the permit, it is the Inspector's responsibility to independently verify compliance with the material usage limit.

Indicate whether the facility is in or out of compliance and explain how the compliance status was determined with this permit condition:

In Compliance Out of Compliance Pending

Recordkeeping

Note: *This requirement addresses the "5-year recordkeeping" and "availability to DEQ Representatives upon request" requirements appearing in the General Provisions of the permit.*

Indicate whether the facility is in or out of compliance and explain how the compliance status was determined with this permit condition:

In Compliance Out of Compliance Pending

6. 40 CFR 63, Subpart HHHHHH Requirements (If Applicable)

Has an exemption from the EPA been granted to this facility in accordance with 40 CFR 63.11170 (a)(2)?

YES

Date issued: _____

Note: Verify that the coatings listed in the exemption are still being used at the facility.

NO

If EPA has not granted the facility an exemption, then on and after the date of initial startup or January 10, 2011, whichever is later, the permittee shall comply with the following applicable emission limitations and requirements of the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH in addition to the applicable conditions referenced above:

General Compliance Requirements

Painter certification

Indicate whether the facility is in or out of compliance and explain how the compliance status was determined with this permit condition:

In Compliance Out of Compliance Pending

Spray gun cleaning

Note: Spray gun cleaning MUST be conducted in a closed container or fully enclosed spray gun washer. Spraying of solvents through the spray gun directly into the atmosphere IS NOT an allowable form of cleaning.

Indicate whether the facility is in or out of compliance and explain how the compliance status was determined with this permit condition:

In Compliance Out of Compliance Pending

Recordkeeping Requirements

Painter certification

Indicate whether the facility is in or out of compliance and explain how the compliance status was determined with this permit condition:

In Compliance Out of Compliance Pending

Filter efficiency documentation

Indicate whether the facility is in or out of compliance and explain how the compliance status was determined with this permit condition:

In Compliance Out of Compliance Pending

Notifications

Note: Review the facility's file closely, as several facilities have already submitted their initial notifications, and several others have submitted their initial notifications with their permit application materials.

Indicate whether the facility is in or out of compliance and explain how the compliance status was determined with this permit condition:

In Compliance Out of Compliance Pending

Deviation

Indicate whether the facility is in or out of compliance and explain how the compliance status was determined with this permit condition:

In Compliance Out of Compliance Pending

Compliance assessments

Indicate whether the facility is in or out of compliance and explain how the compliance status was determined with this permit condition:

In Compliance Out of Compliance Pending

Reporting Requirements

Annual Change Report

Note: This report is only required if the facility makes a change in their method of operation that has not previously been reported.

Indicate whether the facility is in or out of compliance and explain how the compliance status was determined with this permit condition:

In Compliance Out of Compliance Pending
