

Policy: Section 2-1-119.1 Permit Exemptions for Powder and Radiation Cured Coating Operations

Policy If a coating operation is exempt from permitting per Section 2-1-119.1 because the source uses only powder or radiation cured coating, then associated cleanup solvent is also exempt.

Exceptions This policy does not apply to the following:

- **Sources expressly subject to permitting**, per Section 2-1-319, based on combined coating and cleanup solvent emissions.
- **Solvent Cleaning Equipment:**
 1. Cold cleaner
 2. Degreaser
- **Surface preparation.** Refer to the permit exemption in Regulation 2-1-118.9.
- **Radiation cured ink.** Refer to the permit exemption in Section 2-1-119.2.

Effective date February 28, 2008

Rationale This policy clarifies the permit exemption for powder and radiation cured coating operations, based on the following rationale:

- The permit exemption in Regulation 2-1-119.1 is based solely on the type of coating use, and not on the associated cleanup solvent.
- If a source meets Regulation 2-1-119.1 based on the type of coating used, the source is exempt from District permit requirements.
- A source loses its exemption if the requirements of Regulation 2-1-316 through 2-1-319 apply, based on combined coating and cleanup solvent emissions.

What to do with currently permitted sources For currently permitted powder or radiation cured coating operations that are exempt by this policy, the permit engineer shall change the status of the source to “exempt” upon request by the applicant.

Continued on next page

Policy: Section 2-1-119.1 Permit Exemptions for Powder and Radiation Cured Coating Operations, Continued

Definitions

The following is a list of associated definitions.

- **Cleanup solvent**– Solvent used to clean coating application equipment.
- **Powder coating operation** – A coating operation where the coating is applied as a dry powder. The coating is typically applied electrostatically, and is then cured under heat to allow the coating flow and form a skin.
- **Radiation cured coating operation**– A coating operation where ultraviolet or electron beam energy is used to initiate a reaction to form a polymer network.
- **Surface preparation** – The cleaning of surfaces prior to coating, further treatment, sale or intended use.

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Approvals

Name & Title	Signature	Date
Brian Bateman, Director of Engineering	Signed by Brian Bateman	2/28/2008
