

# PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY TECHNICAL PROCEDURE

POLICY NO.: Technical Procedure, TECH-202      EFFECTIVE DATE: April 5, 2002

## POLICY: CONTROLLING OVERSPRAY IN PAINT SPRAY OPERATIONS

In order to provide the public with a consistent interpretation of the Pima County Codes, and ensure the safety of PDEQ staff, departmental protocol regarding paint over spray shall be followed.

PURPOSE: The purpose of this policy is to control over spray in paint spraying operations to a limit containing no less than 96 percent of over spray as addressed in Pima County Code 17.16.400.C.1.

The following interpretation of Rule 17.16.400.C.1 shall be utilized:

**No person shall conduct any spray paint operation without minimizing organic solvent emissions. Such operations, other than architectural coating and spot painting<sup>1</sup>, shall be conducted in an enclosed area equipped with controls containing no less than ninety-six percent of the over spray.**

1. Ensure that all paint spray operations using less than 2 gallons per day and 522 gallons per year of product, shall be conducted using the following controls:
  - A. Spray coating operations shall be conducted inside of a confined area that has at least three sides at least eight feet high. Confined areas with a forced air exhaust must have a filtering system meeting the requirements of No. 2 below.
  - B. No spray coating operations shall be conducted if the “confining structure” or “confinement” has any visible rips, tears, or holes.
  - C. Spray coating operations shall be conducted so that the over spray remains within the enclosure. This includes, but is not limited to, the following:
    1. Using the spray gun in a horizontal or downward pointing manner so that the over spray is directed at the walls or floor of the enclosure.
    2. No spray painting within three feet of the open end and two feet of the top of the enclosure.
    3. Conducting spray coating operations when wind conditions do not cause overspray to be visibly emitted from the enclosure.
  - D. If any visible emission or evidence of visible emissions are observed by the Control Officer either from the enclosure or crossing the property line of the source, the spray coating operation(s) must be conducted in accordance with No. 2.
2. Ensure that spray coating operations using more than 2 gallons per day and 522 gallons per year of product, shall be conducted using the following controls:
  - A. An approvable paint spray operation, other than for architectural or spot painting purposes, will be one that is conducted in any suitable enclosure where the over spray is directed to either:

- a filtering system designed for controlling the particulate portion of the over spray;
- a commercially designed water curtain or equivalent;
- a baffle system designed for the purpose, along with a statement by the manufacturer that the 96% control requirement will be met; or
- any other system, which can be shown to meet the over spray control requirement.

Use of anyone or more of these demonstrates compliance, unless evidence of over spray is observed outside of the contained area.

- B. For the purpose of approving “other systems” or approval of filtering systems as described above, the Control Officer may approve any system where the over spray is exhausted through one or more filters commercially designed for the primary purpose of removal of particulate matter from surface coating. Such systems shall be installed and maintained with no gaps or visible openings during system operation, and must be installed in accordance with the filter manufacturer’s and/or system manufacturer’s recommendations.
- C. The spray booth exhaust must be directed vertically up into the atmosphere.

For the purposes of this policy:

**Spot Painting** is defined to include any spray painting for the purpose of lettering, stenciling, or identifying containers or similar work; any painting using a spray can; or any spray painting where less than 50% of the total surface area of the object is coated and the total surface area coated is less than 16 square feet.

**Suitable Enclosure** is defined as a confined area, completely enclosed, where all exhaust from the controls is handled as described in No. 2.A or 2.B above.

APPROVED BY:

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Director

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Date

Original Policy Approved: November 10, 1993

Date(s) Revised: April 7, 1997, March 10, 2000, April 5, 2002