



## **United States Environmental Protection Agency Air Quality Permit by Rule for New or Modified True Minor Sources of Air Pollution in Indian Country**

<https://www.epa.gov/tribal-air/tribal-minor-new-source-review>

### **Questionnaire for Notification of Coverage under the Air Quality Permit by Rule for New or Modified True Minor Source Auto Body Repair and Miscellaneous Surface Coating Operations in Indian Country**

Last Modified: February 13, 2017

Version 1.0

#### **Does the Permit by Rule apply to my facility?**

The following questionnaire is intended to help you, the facility owner or operator, determine whether or not you are eligible for the Air Quality Permit by Rule for New or Modified True Minor Source Auto Body Repair and Miscellaneous Surface Coating Operations in Indian Country. You are not required to complete this questionnaire and it is not necessary to seek coverage under the Air Quality Permit by Rule for New or Modified True Minor Source Auto Body Repair and Miscellaneous Surface Coating Operations in Indian Country. This questionnaire does not cover all of the Air Quality Permit by Rule requirements and does not guarantee coverage of a minor source preconstruction permit under this program.

#### **Description of Auto Body Repair and Miscellaneous Surface Coating Operations**

An auto body shop repairs, repaints, and/or customizes passenger cars, trucks, vans, motorcycles, and other mobile equipment capable of being driven or drawn on the highway. Miscellaneous surface coating operations involve the spray application of coating to miscellaneous parts and/or products made of metal or plastic, or both. This Auto Body Repair and Miscellaneous Surface Coating Operations Questionnaire is for auto body repair and miscellaneous surface coating operations facilities that are not major sources of air pollution and that are located, or planning to locate, within Indian country.

#### **About this Questionnaire**

The questions focus on general information pertaining to your existing or future auto body repair and miscellaneous surface coating operation. The questionnaire is not meant to be exhaustive and only requires knowledge of basic facility information, including usage of volatile organic compound (VOC) containing materials.

#### **You should continue with this Questionnaire if you meet all of the following criteria:**

- You plan to construct a new, true minor source autobody repair and miscellaneous surface coating operation OR you plan to modify an existing, true minor source autobody repair and miscellaneous surface coating operation;
- Your new or modified true minor source auto body repair and miscellaneous surface coating operation is located within Indian country;
- You do not know whether your facility needs a permit, or if you do not know the attainment status of your area and you want to find out whether or not you should apply for the Permit by Rule for an auto body repair and miscellaneous surface coating operation; and
- You intend to satisfy the processes that the EPA has made available in the document entitled "Procedures to Address Threatened and Endangered Species and Historic Properties for New or Modified True Minor Sources in Indian Country Seeking Air Quality Permits by Rule" to address threatened and endangered species and historic properties.

## More Information

The definition of “modification” and “Potential to Emit” (or “PTE”) can be found at 40 CFR 49.152(d) and in the “Instructions” document. Additional information on the applicability of the Indian Country NSR rule can be found at 40 CFR 49.153.

Information on the ozone attainment status of the area where your facility is located can be found at: <https://www.epa.gov/green-book>. You may also contact your reviewing authority for information on your attainment status.

Please contact your reviewing authority if you have questions or need assistance. A list of reviewing authorities, their areas of coverage, and contact information can be found in Attachment E to the Permit by Rule for True Minor Source Auto Body Repair and Miscellaneous Surface Coating Operations at 40 CFR 49.162 or visit: <https://www.epa.gov/tribal-air/tribal-minor-new-source-review>.

Sources eligible for the Permit by Rule for New or Modified True Minor Source Auto Body Repair and Miscellaneous Surface Coating Operations may also be subject to federal standards under 40 CFR 63 Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. The conditions applicable to sources seeking coverage under this Permit by Rule are intended to be generally consistent with the requirements in 40 CFR 63, Subpart HHHHHH. However, compliance with the applicable requirements in 40 CFR part 63, Subpart HHHHHH is required independent of the conditions in the Permit by Rule, and not all requirements applicable under Subpart HHHHHH are necessarily included in the Permit by Rule. The Background Document for the Permit by Rule identifies the specific requirements in Subpart HHHHHH that are intended to be included in the Permit by Rule.

## Questionnaire for Auto Body Repair and Miscellaneous Surface Coating Operations

### Part 1: Does my Auto Body Repair and Miscellaneous Surface Coating Operation Need or Qualify for a True Minor Source Permit?

The following questions are meant to determine whether or not your auto body repair and miscellaneous surface coating operation needs or qualifies for the permit by rule.

1. Will your new source or modification of an existing source be a major source under the CAA for purposes of hazardous air pollutants (HAPs)? Will your new source or modification of an existing source emit or have the PTE, in the aggregate, 10 tons per year (tpy) or more of any HAP or 25 tpy or more of any combination of HAPs? Be sure to include any stationary source or group of sources (new or existing) under common control.

☐ Yes      ☐ No

If you answered **‘Yes,’** your source does not qualify for this Permit by Rule and is considered a major source for HAP purposes. Please contact your reviewing authority to apply for a site-specific permit. If you answered **‘No,’** continue to the next question.

2. Will the PTE of your facility be less than 250 tpy for particulate matter (PM, PM<sub>10</sub>, or PM<sub>2.5</sub>), VOC, nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), and sulfur dioxide (SO<sub>2</sub>), each individually? The emissions from your facility may be calculated using the PTE calculator provided at <https://www.epa.gov/tribal-air/tribal-minor-new-source-review>. Be sure to include all existing, new, and modified emission units at your facility.

☐ Yes ☐ No

If you answered **‘No,’** your source does not qualify for the Permit by Rule. Please contact your reviewing authority to apply for a site-specific permit. If you answered **‘Yes,’** continue on to the next question.

3. Will the PTE of your new facility or the increase in potential emissions from your modified facility be equal to or above the applicable minor NSR thresholds listed below for ANY pollutant? The emissions of your facility or modification may be calculated using the PTE calculator available online at: <https://www.epa.gov/tribal-air/tribal-minor-new-source-review>. Be sure to include all new or modified emission units at your facility.

Pollutant	Attainment Area	Nonattainment Area
CO	10 tpy	5 tpy
PM	10 tpy	5 tpy
PM <sub>10</sub>	5 tpy	1 tpy
PM <sub>2.5</sub>	3 tpy	0.6 tpy
SO <sub>2</sub>	10 tpy	5 tpy
NO <sub>x</sub>	10 tpy	5 tpy
VOC	5 tpy	2 tpy

☐ Yes ☐ No

If you answered **‘No,’** your source is likely exempt from the minor NSR program. Please contact your reviewing authority to confirm that your facility will not need a permit. If you answered **‘Yes,’** continue on to the next question.

4. If located in a nonattainment area for any pollutant, will the PTE of your facility for the particular nonattainment pollutant be less than the NSR major source thresholds specified in the table below (based on nonattainment classification)? Be sure to include all existing, new, and modified emission units at your facility.

Pollutant	Nonattainment Classification	NSR Major Source Threshold
Ozone	Marginal	100 tpy of VOC or NO <sub>x</sub>
	Moderate	100 tpy of VOC or NO <sub>x</sub>
	Serious	50 tpy of VOC or NO <sub>x</sub>
	Severe	25 tpy of VOC or NO <sub>x</sub>
	Extreme	10 tpy of VOC or NO <sub>x</sub>
PM <sub>10</sub>	Moderate	100 tpy
	Serious	70 tpy
CO	Moderate	100 tpy
	Serious	50 tpy
SO <sub>2</sub> , NO <sub>2</sub> , PM <sub>2.5</sub>	No nonattainment classification	100 tpy

☐ Yes    ☐ No    ☐ Not Applicable

If you answered ‘**No**,’ your source does not qualify for the Permit by Rule. Please contact your reviewing authority to apply for a site-specific permit. If you answered ‘**Yes**,’ continue on to Part 2 of the Questionnaire.

Information on the ozone attainment status of the area where your facility is located can be found at:  
<https://www.epa.gov/green-book>.

## Part 2: Does My Auto Body Repair and Miscellaneous Surface Coating Operation Qualify for the Permit by Rule?

The following questions are meant to determine whether or not your auto body shop would qualify for the Permit by Rule for True Minor Source Auto Body Repair and Miscellaneous Surface Coating Operations.

1. If located in an ozone attainment, unclassifiable or attainment/unclassifiable area, after the proposed construction or modification project, will your VOC-containing material (including coatings, thinners, and clean-up solvents) usage be less than 5,000 gallons per year based on a 12-month rolling total?

☐ Yes    ☐ No    ☐ Not Applicable

2. If located in an ozone nonattainment area, after the proposed construction or modification project, will your VOC-containing material (including coatings, thinners, and clean-up solvents) usage be less than 900 gallons per year based on a 12-month rolling total?

☐ Yes    ☐ No    ☐ Not Applicable

3. If located in an attainment, unclassifiable or attainment/unclassifiable or nonattainment area for ozone, after the proposed construction or modification project, will the projected total usage of solvent for degreasing at your facility not exceed 500 gallons in any 12-month period?

☐ Yes ☐ No ☐ Not Applicable

4. If there are fuel combustion units, will your facility only use natural gas, propane, or butane as fuels for these combustion units?

☐ Yes ☐ No ☐ Not Applicable

5. If there are fuel combustion units, is the total heat input capacity of all the combustion units equal to or less than 10 MMBtu/hour?

☐ Yes ☐ No ☐ Not Applicable

6. Is the capacity of each volatile liquid storage tank less than 19,812 gallons?

☐ Yes ☐ No ☐ Not Applicable

7. Do you intend to satisfy the procedures for threatened and endangered species and historic properties according to the processes provided by the EPA for the permits by rule?

☐ Yes ☐ No

## Conclusion

If you answered **'Yes'** or **'Not Applicable'** to each question in Part 2, your facility may qualify for coverage under the Permit by Rule for Auto Body Repair and Miscellaneous Surface Coating Operations. If you believe, based upon your answers in this questionnaire, that your new or modified auto body repair and miscellaneous surface coating operation qualifies for the Permit by Rule for Auto Body Repair and Miscellaneous Surface Coating Operations, please contact your reviewing authority to obtain a notification of coverage.

If you answered **'No'** to any of these questions, your facility may not qualify for coverage under the Permit by Rule for Auto Body Repair and Miscellaneous Surface Coating Operations. Please contact your reviewing authority to confirm that your facility will not qualify for this Permit by Rule.