



ENVIRONMENTAL REQUIREMENTS FOR THE SURFACE COATING INDUSTRY

Surface coating is the process of applying paints or coatings to a substrate, such as metal, wood, or plastic, for decorative or protective purposes. Sources include: motor vehicles, stationary and mobile repair and refinishing operations, wood finishing, and others. Businesses that perform surface coating operations are subject to a variety of state and federal environmental regulations. This document provides an overview many of the air, water, and waste regulations affecting Colorado surface coaters.

AIR REQUIREMENTS

Most surface coating facilities emit some type of air pollution. Depending on the type and amount of air pollutants emitted, you may have to comply with Colorado's air pollution control and permitting regulations. Emissions of volatile organic compounds and hazardous air pollutants are the main concerns. These originate from the use of paints, coatings, thinners, and adhesives in surface coating operations. Other sources of air pollutants (e.g., cutting, grinding, blasting) from these operations will not be covered in this guidance document at this time.

Volatile organic compounds (VOCs) and Nitrogen oxides contribute to the formation of ground-level ozone, a component of smog by evaporation of chemicals used in surface coating and other industries. Although ozone is needed in the upper atmosphere, in the lower atmosphere, ozone contributes to air pollution and can impact public health. Specific reporting requirements for VOCs are outlined in Colorado Regulation No. 3 and Regulation No. 7. These regulations are available online at www.cdphe.state.co.us/ap/regoverview.html. Until recently, all of Colorado was designated as an attainment area for ozone because the state had maintained compliance with the National Ambient Air Quality Standards (NAAQS) for ozone. This designation changed for the Denver-metropolitan and North Front Range areas of Colorado on November 20, 2007 as this area became "nonattainment" for the federal ozone standard when a deferral by the U.S. Environmental Protection Agency (EPA) expired. This nine-county area known as the 8-hour ozone nonattainment area includes the counties of Adams, Arapahoe, Boulder (including most of Rocky Mountain National Park), Broomfield, Denver, Douglas, Larimer, Jefferson, and Weld. The nonattainment designation in this area is a result of a violation of the federal 8-hour ozone standard. For more information and a map outlining the 8-hour ozone nonattainment area, visit www.cdphe.state.co.us/ap/ozone.html. Surface coating facilities should be aware of the changes and act accordingly as air pollutant reporting requirements have also changed (VOC and Nitrogen oxide (NOx) reporting thresholds for a nonattainment area must be followed for the 8-hour ozone nonattainment areas of Colorado).

Hazardous air pollutants (HAPs) are compounds that have been included on the Environmental Protection Agency's (EPA) list of 188 chemicals that can have detrimental effects on humans and the environment. The list of HAPs regulated by the EPA and Colorado is maintained in Colorado Regulation No. 3, Appendix A. The HAP list and method for identifying HAP reporting thresholds is available online at www.cdphe.state.co.us/ap/regoverview.html.

Reporting Requirements

In Colorado, surface coating operations that are or will be emitting air pollutants above certain reporting levels are required to submit an Air Pollutant Emission Notice (APEN) to the Colorado Air Pollution Control Division (APCD). APEN reporting thresholds are listed in Regulation No. 3, Section A, II.D. The table below outlines the reporting levels for VOCs and other air pollutants. Areas designated as attainment in Colorado can follow the less stringent reporting requirements. Areas designated as nonattainment for ozone and NOx will be required to follow the more conservative reporting levels listed in Table 1.

Reporting thresholds for hazardous air pollutants (HAPs) are determined using the procedures outlined in Regulation No. 3, Appendix A. These procedures allow you to select reporting levels based on the scenario (release points and property boundaries) that best fits your operations. Most surface coating operations use Scenario 1 to determine reporting levels since it is the most conservative. Remember, your goal, is to evaluate the products you use and determine if there are alternative products that could be used to reduce or eliminate VOC, HAP and other pollutant emissions in your operations and then determine if a change to alternative products is feasible for your business. Also, all containers of VOC-or HAP-containing materials must be kept closed when not in use to minimize evaporation into the ambient air.

**TABLE 1
APEN THRESHOLDS**

	UNCONTROLLED ACTUAL EMISSIONS	
	Attainment	NonAttainment
Pollutant Category		
Criteria Pollutant (NOx, SOx, CO, Ozone, PM, PM-10)	2 tons per year	1 ton per year
Lead	100 pounds per year	100 pounds per year
Non-Criteria Pollutant (HAPs and other reportable air pollutants)	De Minimis Level (Determined Using Procedures in Regulation 3, Appendix A)	De Minimis Level (Determined Using Procedures in Regulation 3, Appendix A)

Some chemicals are not regulated as VOCs such as acetone, methylene chloride, and some chlorofluorocarbons (CFCs) and hydro chlorofluorocarbons (HCFCs) that may be used by surface coaters. These chemicals are referred to as Negligibly Reactive VOCs (NRVOCs) and should not be included in VOC emission calculations. The list of NRVOCs can be found in the Colorado Common Provisions Regulation, 5 CCR 1001-2. The NRVOC list is also available online at www.cdphe.state.co.us/regulations/airregs/100102aqcccommonprovisionsreg.pdf.

Calculating VOC and HAP Emissions

It is important for you to evaluate your facility's emissions of Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs). Your actual uncontrolled VOC and HAP emissions will determine what Colorado Air Regulations will apply to your facility. The guidance document "A Simple Guide to Calculating and Reporting Your VOCs and HAPs" provides an overview of this process. This document is available online through the APCD Guidance Document Library at www.cdphe.state.co.us/ap/stationarylibrary.html.

Air Pollutant Emission Notices (APENs)

You must submit an APEN for your surface coating facility when uncontrolled actual emissions for an emission point or group of emission points exceeds any of the reporting thresholds listed in Table 1 above. If your calculated emissions exceed these thresholds, you must submit the form titled, "Spray Paint Operations – Specialty APEN" and "APEN Addendum for Non-Criteria Reportable Pollutants (HAPs)" to report your VOC and HAP emissions, respectively. Both forms are available from the APCD and on the web at www.cdphe.state.co.us/ap/downloadforms.html. Once the APEN has been submitted, it is valid for five years. The APEN lists current equipment at your facility associated with reportable air emissions. If you change products and/or equipment e.g., you switch to a powder coating or purchase a different paint booth or dryer, you will be required to notify the Air Division. This includes any emissions control equipment.

A fully completed APEN form must be submitted to the APCD at least 30 days before expiration of the five-year term on the current APEN. The current APEN filing fee is \$152.90 (fees are subject to change annually). You must submit the APEN filing fee with the APEN submittal or the form may be returned to you. It is important to keep the APEN(s) for your facility up to date. If the APEN for your facility is more than five years old, your product(s) have changed, your equipment has changed or your facility is operating under a new name or new ownership, it may be time to submit a new APEN and the associated fee.

The Air Division will use the information provided in the APEN to determine if an air permit is required. If a permit is required, the APEN will become part of the permit application package.

Certain categories of sources are exempt from APEN requirements because the emissions from those sources are considered to have very little impact on air quality. Exempt sources are listed in Regulation 3, Part A, Section II.D. This regulation is available online at www.cdphe.state.co.us/ap/regoverview.html. If you are not certain whether a source at your facility is exempt, contact the Small Business Assistance Program.

Air Permits

Air emissions at your surface coating facility may trigger the need for an air permit (called a "Construction Permit") due to the level of air pollutants emitted. In Colorado, a Construction Permit is required before you begin construction of a new source or for modification of an existing source, if uncontrolled actual emissions from this source exceed any of the annual reporting levels listed in Table 2.

Note, reporting levels changed for the nine-county region designated as nonattainment for ozone on November 20, 2007. This change affects APEN and air permitting threshold reporting levels. Permit reporting thresholds are listed in Regulation No. 3, Part B, Section II.D.3.

Exemptions from permit requirements are listed in Regulation 3, Part B, Section III. A list of permit exemptions is available online at www.cdphe.state.co.us/ap/regoverview.html. None of the exemptions apply if a source would otherwise be subject to any specific federal or state requirement such as the National Emission Standards (NESHAP) for Stripping and Miscellaneous Surface Coating Operations. If you are not sure whether a source at your facility is exempt from obtaining an air permit, contact the Small Business Assistance Program.

Sources of non-criteria pollutants (HAPs) typically do not require an emission permit unless:

- The source emissions are also volatile organic compounds or a particulate that exceeds the thresholds listed above, or
- The source emits a federally regulated non-criteria air pollutant (HAP) that is subject to a federal standard such as the NESHAP for Stripping and Surface Coating Operations (Subpart 6H) or the Metal Fabrication Rule (Subpart 6X).

The Permitting Process

In Colorado, air permits are issued in two phases:

- **Initial Approval** and **Final Approval**.

An **Initial Approval** air permit allows the source to be constructed and begin operation. Under most circumstances, if your business is already operating and you determine that you may need an air permit (for example, you have expanded your surface coating operations), you will also receive an Initial Approval permit after submitting the APEN. The Initial Approval permit gives you a chance to review the permit conditions and make certain they are feasible for your company and you can comply with them.

A **Final Approval** permit is issued after the owner certifies that the source is in compliance with the conditions of the Initial Approval permit. The owner must submit the final approval self-certification form to the APCD within six months (180 days) of start up of operations or within six months of the date the Initial Approval permit is issued.

Your air permit defines the type of air pollution control measures that will be used, sets air pollutant emission limits (such as VOC and HAP emission limits), requires you to mark the air permit number on each piece of equipment subject to the air permit, and includes recordkeeping requirements. Take the time to review your air permit and be familiar with your regulatory requirements.

APEN required/Permit exempt sources must maintain air emissions data or purchasing records to demonstrate compliance with the permit exemption. Typically, VOC and HAP data can be obtained directly from your supplier. More information on the air permitting process can be found in the guidance document, “Reporting

Your Air Emissions and Applying for Air Permits Step-by-Step for Colorado Small Businesses.” This document is available through the Air Division and downloadable at www.cdphe.state.co.us/ap/stationarylibrary.html.

TABLE 2
Air Permit Thresholds

Pollutant Category	UNCONTROLLED ACTUAL EMISSIONS	
	Attainment (tons per year)	NonAttainment (tons per year)
Volatile organic compounds	5	2
PM-10 and PM-2.5	5	1
Total suspended particulates	10	5
Carbon monoxide	10	5
Sulfur dioxide	10	5
Nitrogen oxides	10	5
Lead	200 pounds per year	200 pounds per year
Other criteria pollutants: fluorides, sulfuric acid mist, hydrogen sulfide, total reduced sulfur, reduced sulfur compounds, municipal waste incinerator emissions.	2	2

Recordkeeping Requirements

Your facility may be required to maintain air emission records for VOCs, HAPs, and/or other air pollutants as specified in your air permit. These records must be available to the APCD for inspection upon request. Your facility should maintain a copy of the most recent APEN, fee (check or cancelled check), air permit, air emissions calculations, and other documents as required by your air permit. The air permit number must be permanently affixed on each affected piece of permitted equipment for ease of identification (e.g., paint booths, dryers, and control equipment).

Regulation No. 7 Requirements

Air Regulation No. 7 limits VOC emissions from all businesses in Colorado. Regulation No. 7 requires select businesses to reduce VOC emissions using Reasonably Available Control Technology (**RACT**). These requirements may include using low VOC or high performance coatings, High Volume Low Pressure (HVLP) spray guns, or other technology that will achieve a high degree of emission control for your operations. RACT requirements will be included in your air permit. Regulation No. 7 also includes specific provisions that *significantly affect* surface coaters that manufacture new products (as opposed to refurbishing products) in the Denver-Metro area (Adams and Arapahoe counties west of Kiowa Creek, Boulder County excluding Rocky

Mountain National Park, Broomfield, Denver, Douglas, and Jefferson Counties). In many cases, Regulation No. 7 limits the *content* of VOC allowed in certain coatings. For example, surface coaters that manufacture metal parts and products in the Denver–Metro area are not allowed to apply air-dried coatings with more than 3.5 pounds of VOC per gallon of coating as applied (e.g., mixed with reducers or thinner). Regulation No. 7 includes similar requirements for other types of surface coaters. Exemptions for surface coating operations are listed in the General Provisions of Regulation No. 7, Section IX.A.6. and under each type of surface coating operation, if applicable. Take the time to review, understand, and be able to demonstrate compliance with Regulation No. 7. More detailed information on Regulation No. 7 as it applies to each type of surface coating operation is available online at www.cdphe.state.co.us/ap/stationarylibrary.html.

Other Federal Air Compliance Requirements

In addition to the state regulations described above, some Colorado surface coaters are subject to federal regulations called National Emission Standards for Hazardous Air Pollutants (NESHAP) or Maximum Achievable Control Technology (MACT) standards. These standards for surface coaters typically apply to "major sources" of HAP emissions (25 tons per year total or 10 tons per year for a single HAP) which is why so few in Colorado are subject to these regulations. However, on January 9, 2008, the EPA issued a final NESHAP standard for smaller emitting sources, called area sources, that involves paint stripping and surface coating operations. To determine whether this or other standards apply to your business, visit www.cdphe.state.co.us/ap/mact.html or contact the Small Business Assistance Program (SBAP). A fact sheet that outlines the final rule requirements for paint stripping and miscellaneous surface coating operations at area sources is available online at www.cdphe.state.co.us/ap/stationarylibrary.html. The fact sheet is called, "Air Toxics Standard for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, Final Rule". A copy of the final rule is available at <http://www.epa.gov/fedrgstr/EPA-AIR/2008/January/Day-09/a24718.htm>

In addition to the federal NESHAP rules, a few Colorado surface coaters (e.g. metal can, metal coil, large appliances, metal furniture, and plastic parts for business machines) are subject to federal regulations called New Source Performance Standards (NSPS). To determine whether an NSPS applies to your business, visit www.cdphe.state.co.us/ap/nsps.html. More detailed information on both NESHAP and NSPS requirements for surface coaters is available online at the stationary library website listed above.

Air Emission and Permitting Fees

APEN Fee: A \$152.90 filing fee is required for each APEN submitted, this includes APENs submitted for administrative changes (e.g., change in ownership or change in location). The APEN fee is subject to change by the legislature on an annual basis. Current fee information is available online at www.cdphe.state.co.us/ap/billing.html.

Annual Fee: All sources required to file an APEN must pay annual fees based on their estimated actual uncontrolled annual emissions of air pollutants (not your air permit limits). The Air Division will assess an annual fee of approximately \$22.90 per ton of VOC emitted and approximately \$152.90 per ton of non-criteria (HAP) emitted. The Division mails invoices to small businesses for these fees in March through June of each year. Fees are subject to change by the legislature on an annual basis.

Permit Processing Fee: In addition to the \$119.96 APEN filing fee, permit-processing fees are assessed at an hourly rate of \$76.45/hour. If you decide to discontinue surface coating operations at your facility, please submit a cancellation form to the Air Division or a letter on company letterhead requesting that the APEN or air permit be cancelled.

HAZARDOUS WASTE REQUIREMENTS

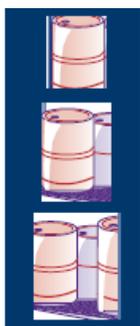
As an environmentally conscientious business, it is your responsibility to eliminate waste by making better choices about the product you buy. If you generate hazardous waste, it should be managed in a safe and environmentally responsible manner. Federal and state regulations place the burden on you as the generator to properly dispose of hazardous waste. A "*Guide to Generator Requirements of the Colorado Hazardous Waste Regulations*" is available to help you understand your hazardous waste requirements. This guide is available

online at www.cdphe.state.co.us/hm/handbk.pdf. The following is an overview of hazardous waste requirements for the surface coating industry.

Do You Generate Hazardous Waste?

Surface coating operations that generate waste solvents, paints, paint filters, parts-cleaning solvents, used oil, used oil filters, or antifreeze may be subject to hazardous waste regulations implemented by the Colorado Department of Public Health and Environment (CDPHE) Hazardous Materials and Waste Management Division (HMWMD). Hazardous waste management requirements become increasingly more stringent as the amount of hazardous waste generated at your facility increases. For example, as you generate more hazardous waste, your business classification can change from a Conditionally Exempt Small Quantity Generator (CESQG) to a Small Quantity Generator (SQG) or a Large Quantity Generator (LQG). All surface coating operations must identify the hazardous waste they generate and ensure that wastes are handled and disposed of properly.

Hazardous Waste Generator Status



Conditionally Exempt Small Quantity Generator (CESQG) – generates 25 gallons (~220 pounds) or less of hazardous waste per month.

Small Quantity Generator (SQG) – generates more than 25 gallons (~220 pounds) and under 300 gallons (~2200 pounds) of hazardous waste per month.

Large Quantity Generator (LQG) – generates 300 gallons (~2200 pounds) or more of hazardous waste per month.

You must determine your facility's generator status based on the monthly quantity of hazardous waste generated and the amount accumulated at your facility. A generator can change categories. Because the category is related to the cumulative amount of hazardous waste generated as outlined above, this amount may vary from month to month. If your generator status changes for hazardous waste, you must submit a revised Hazardous Waste Notification of Regulated Waste Activity form with the HMWMD. It is wise to select the highest generator status to which you might be subject and follow the requirements for this generator status even if you are in a lower category most of the time.

Hazardous Waste Accumulation Requirements

You are required to ship hazardous waste often enough to meet the generator accumulation limits that apply to your generator status as outlined below. The time period starts from the date marked on the drum or tank known as the accumulation date. Accumulation dates do not apply to CESQGs.



Conditionally Exempt Small Quantity Generator (CESQG) – No accumulation time requirements. Must never accumulate 1000 kilograms (2200 pounds) or more onsite at any one time (about five (55) gallon drums).

Small Quantity Generator (SQG) – May not accumulate hazardous waste for more than 180 days from the date on drum or tank (270 days if the generator must ship farther than 200 miles from the facility). Must not accumulate more than 6,000 kilograms (13,000 pounds) or about thirty (55) gallons drums) onsite at any one time.

Large Quantity Generator (LQG) – 90 days from the date on drum or tank. An LQG has no quantity limits.

Application Process

An authorized representative of your printing facility should complete the **Colorado Notification of Regulated Waste Activity Form** and submit it to the HMWMD. The completed notification form must have original signatures and should be sent to the Hazardous Materials and Waste Management Division's Notification Coordinator. The Hazardous Waste Division will issue a unique EPA Identification Number and notify the owner or operator as soon as practicable. An EPA identification number is not a permit, it is a number issued by the State and EPA to identify a facility for hazardous waste management purposes. The notification form is available online at www.cdphe.state.co.us/hm/notification.htm. If your facility generates 3 gallons or more of certain waste solvents and degreasers per month (containing hazardous waste codes F001, F002, F004, and/or F005 (halogenated and non-halogenated solvents)), you must submit a notification form to the HMWMD. Information on the notification requirements is available online at www.cdphe.state.co.us/hm/cesqgnotify.pdf.

Hazardous Waste Generator fees

There are annual Hazardous Waste Commission fees and Generator fees associated with the notification process. Facilities will be billed annually by the HMWMD for the Generator and Hazardous Waste Commission fees as listed below (fees are subject to change annually). These fees are generally billed in August of each year. Information on current fees is available online at www.cdphe.state.co.us/hm/feenotice.htm.

Requirements for Handling Recycling Unit/Distillation Waste

Typically lacquer thinners contain solvents like toluene and/or methyl ethyl ketone. Use of these lacquer thinners creates a listed hazardous waste. Any wastes that are in contact with the spent lacquer thinners including recycling/distillation waste, still bottoms, pucks, sludge, etc., are listed hazardous wastes and must be disposed of at a hazardous waste disposal facility. These wastes are hazardous regardless of analysis showing no detection of the listed compounds. Whether your waste is wet or dry, it is illegal to dispose of the waste from recycling/distillation units in the trash if your lacquer thinner contains listed solvents.

The Division believes there are many benefits to recycling through the use of recycling/distillation units. However the misconception that the waste from recycling/distillation units can be thrown into the trash (e.g., pucks) has resulted in illegal disposal that can cause harm to human health and the environment. For more information, call the HMWMD or visit the website at www.cdphe.state.co.us/hm.

Requirements for Handling Contaminated Shop Towels and Reusable Absorbents

There are two types of cleaning towels used by surface coaters:

- Disposable wipes that are shipped offsite as nonhazardous solid waste or hazardous waste.
- Reusable shop towels that are sent to a commercial laundry.

Nonhazardous wipes can be disposed of as solid waste. You must be able to show that the wipes are nonhazardous e.g., they do not contain excess coatings or solvents and they are not ignitable, corrosive, or contain toxic metals. Rags, shop towels and other reusable absorbents that are contaminated with a listed hazardous waste or exhibit a hazardous waste characteristic, are considered to be exempt from Colorado hazardous waste regulations only if they are picked up, cleaned, and delivered back to you by a laundering service that uses a solvent-based dry cleaning process or a water-washing commercial laundry with all appropriate wastewater discharge permits from the local sanitation district. Laundering may be done at your facility only with the written approval of the local sanitation district since discharge of wastewater must be approved prior to release. Reusable shop towels and other absorbents managed in this manner do not count toward your total monthly onsite generation of hazardous waste. A copy of the current laundering contract should be maintained in your files.

The shop towels or absorbents would not be exempt from the hazardous waste regulations if free liquid hazardous waste is dumped onto the absorbents or if the absorbents are saturated with free liquid hazardous wastes. One way to ensure that no free liquids are present would be to wring out the soiled materials and collect the released liquid for proper hazardous waste handling and disposal. Any shop towels or absorbents contaminated with a listed hazardous waste or that exhibit a hazardous waste characteristic and are not commercially dry cleaned or laundered must be handled and disposed of as hazardous waste.

WASTEWATER REQUIREMENTS

Most surface coating operations are subject to pre-treatment regulations established by the CDPHE Water Quality Control Division (WQCD) and implemented by your local sewage treatment plant known as a Publicly Owned Treatment Works (POTW). You should always obtain permission from your local POTW before discharging industrial wastes such as antifreeze, oil, and wastewater from washing vehicles, maintenance, or cleaning operations to the sanitary sewer system. The POTW may require you to install a sand trap or oil/water separator or meet other requirements. A list of POTWs is available online at www.cdphe.state.co.us/wq/PermitsUnit/pretreat/POTWcompletelisting.pdf. Contact your local sewer authority or the Water Quality Control Division for guidance. Information is available online at www.cdphe.state.co.us/wq/PermitsUnit/.

STORMWATER REQUIREMENTS

Colorado surface coaters may be subject to stormwater requirements. Unlike *wastewater*, which is discharged to a sanitary sewer system where it is treated by a POTW and then released, *stormwater* refers to the water leaving a business property that either permeates to groundwater or enters sewer drains and discharges directly to local water bodies. The WQCD regulates stormwater discharges by issuing permits under the Colorado Discharge Permit System (CDPS). You may be required to obtain a stormwater permit for your facility depending upon the type of surface coating you do. The Standard Industrial Classification (SIC) Code or codes for the facility usually determines permit coverage. A complete list of regulated industrial activities is available online at www.cdphe.state.co.us/wq/PermitsUnit/SWFactsheet.pdf. The Stormwater permit may require you to control and eliminate pollutants by developing and implementing a Stormwater Management Plan (SWMP).

No Exposure Certification

If **all** industrial activity, materials handling and storage at your facility is protected from precipitation, you may not need to obtain a permit. Instead, you may be able to complete a "**Stormwater No Exposure Certification for Exclusion from CDPS Stormwater Permitting**". Information about the No Exposure Certification and a downloadable form are available online at www.cdphe.state.co.us/wq/PermitsUnit/stormwater/industrial.html. If any industrial activities or materials are or will be exposed to precipitation, your facility is not eligible for the No Exposure exclusion.

There is no fee associated with submittal of the No Exposure Certification form. However, if you are currently under a stormwater discharge permit, any invoices already received for permit coverage must still be paid.

Best Management Practices - Stormwater

- Keep all chemical activities and storage contained within your building or within a protected shelter.
- Caution must be exercised around loading docks and parking lots where materials are moved between vehicles and your facility. If your loading dock is covered, chemicals or other materials brought into the facility via the loading dock will not be exposed to stormwater.
- Use lids or cover dumpsters, compactors, or other containers outside.
- Materials stored in drums, barrels, and tanks intended for outdoor storage must be in good condition and tightly sealed. The containers should be placed on an impervious surface and provided with secondary containment to prevent leakage or overflow from that area.

- Addition of material to or withdrawing of material from these containers while outside is deemed exposure.
- Do not wash or perform maintenance activities on fleet vehicles or material handling equipment outside of the business.
- Clean up spills immediately. Basic precautions are fundamental to reducing the risk of spills and potential exposure to stormwater. Spill control and clean up supplies should be available near chemical storage and material handling areas.
- All personnel involved in industrial activities that may impact stormwater runoff should be trained on your facility's SWMP.
- Inspect your facility for compliance with your stormwater management plan at least twice a year (in the fall and spring) and maintain a record of such inspections.
- Non-stormwater discharges are prohibited.

Stormwater Fees

The permittee is required to submit an annual fee to the Water Quality Control Division. A list of current fees is available online at

www.cdphe.state.co.us/wq/PermitsUnit/POLICYGUIDANCEFACTSHEETS/factsheets/Fees.pdf.

Summary

This guidance provides a short summary of only a few of the environmental regulatory requirements that may affect your surface coating operations. This guidance reviews the basics about air quality, hazardous waste, some other wastes pertinent to surface coaters, and wastewater and stormwater requirements. It is important that you understand all of the regulatory requirements for your business. This guidance only skims the surface.

Remember, the Denver-metropolitan and North Front Range areas of Colorado became “nonattainment” for the federal ozone standard on November 20, 2007. Reporting thresholds for certain air pollutants have also changed. Surface coating facilities that are currently not required to report air emissions may have to do so. Be familiar with the requirements in your area.

Your goal as an environmentally responsible surface coating business is to learn and comply with the regulatory requirements that may apply to your business and then look for opportunities to go beyond compliance. Move your business toward the goal of sustainability and reduce, reuse, and recycle. Look for opportunities to use fewer hazardous materials and to generate less waste and emit less air and water pollution – stopping pollution at its source. It makes good business sense to look beyond compliance – and it is everyone’s responsibility.

RESOURCES

Colorado Department of Public Health and Other Important Contacts

Small Business Assistance Program (SBAP)
(303) 692-3175 and (303) 692-3148
www.cdphe.state.co.us/ap/sbap/index.html

Small Business Ombudsman (SBO)
(303) 692-2135
www.cdphe.state.co.us/oeis/sbo/sbomain.html

Generator Assistance Program (GAP)
(303) 692-3415
www.cdphe.state.co.us/hm/gap/index.htm

Hazardous Material and Waste Management
Division (HMWMD)
Technical Assistance Line
(303) 692-3320 or toll-free (888) 569-1831
Ext. 3320
Division General Number: (303) 692-3300
www.cdphe.state.co.us/hm/index.htm

Spill Release Reporting
Hazardous Material and Waste Management
Division
1(877) 518-5608 (24-hour)
www.cdphe.state.co.us/hm/spillsandreleases.htm

Local health Department Contacts
http://healthguideusa.org/colorado_county_health_departments.htm

Sustainability/P2 Program
(303) 692-2186
www.cdphe.state.co.us/oeis/index.html

Environmental Leadership Program (ELP)
(303) 692-3477
www.cdphe.state.co.us/el/elp/index.html

Water Quality Control Division (WQCD)
Pretreatment Program
(303) 692-3618
www.cdphe.state.co.us/wq/index.html

Stormwater Permits Unit (WQCD)
(303) 692-3500
www.cdphe.state.co.us/wq/index.html

Air Pollution Control Division (APCD)
(303) 692-3100
www.cdphe.state.co.us/ap/index.html

Local Fire Department Contacts
<http://dfs.state.co.us/FireDeptInfo.htm>



