

GOVERNMENT OF THE DISTRICT OF COLUMBIA

Department of Energy and Environment

TECHNICAL SUPPORT MEMORANDUM

TO: File

THROUGH: Stephen S. Ours, P.E. *SSO*
Chief, Permitting Branch

FROM: Abraham T. Hagos *ATH*
Environmental Engineer

**SUBJECT: United States Marine Corps
Permit #7063 Operate a Non-Auto Body Paint Spray Booth.**

DATE: March 31, 2016

BACKGROUND INFORMATION

A permit application to operate an existing non-auto body paint spray booth at the Marine Barracks Washington was received by the Air Quality Division (AQD) on November 2, 2015. The applicant is the United States Marine Corps. The paint booth will be located at the Marine Barracks Washington, located at 8th & I Streets SE.

The permit action is scheduled to be published in the DC Register on April 8, 2016. Public comments for the permit action will be solicited through May 9, 2016.

The United States Marine Corps has not requested that any of the materials submitted with this application be held confidential.

TECHNICAL INFORMATION

The equipment to be covered by this permit is an Appleton enclosed paint and finish booth. The activities at this location include wood working polyurethane and spray can paint spraying application, and limited use of manual application of paints (i.e., brush painting). The facility will not use High Volume Low Pressure (HVLP) or other spray guns. The entire paint booth is equipped with a fan exhaust system and no painting is performed without using the exhaust fan. Note that the filters being used are low efficiency filters (20% efficient), but because spray guns are not being used, it was determined that more stringent requirements do not need to be met.

REGULATORY REVIEW

Chapter 2, Section 200: General Permit Requirements:

A paint booth is a potential air pollution source since paint contains volatile organic compounds

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and particulate matter. Thus a Chapter 2 permit is required.

Chapter 6: Particulates:

The visible emissions limitations of 20 DCMR 606 are applicable to this facility. Proper operation of the equipment and maintenance of paint booth filters would preclude any visible emissions, even during startup or shutdown, so Condition II(c) requires that no visible emissions be emitted.

Chapter 7: Volatile Organic Compounds and Hazardous Air Pollutants

The requirements of 20 DCMR 700 were included in the permit. Because the facility will not be performing activities regulated by other sections of Chapter 7, such as mobile equipment repair and refinishing, most activities occurring in this unit will be regulated under this section.

20 DCMR 708 could be applicable to this application, but since revisions of Chapter 7 took place affecting this section and due to questions regarding the practical enforceability of this section as revised, AQD has decided not to include the requirements of 20 DCMR 708 in the permit.

The requirements of 20 DCMR 718 are not applicable to this paint booth as the facility is not coating mobile equipment. As such, this section has not been addressed in this permit.

Although the permit application did not specify the use of any adhesives, sealants, adhesive primers, or sealant primers, Condition III(b) was written to ensure that no activities trigger the requirements of 20 DCMR 743-749 (commonly known as the "adhesives and sealants rule").

For all of these, appropriate record keeping requirements have been included in the permit.

Chapter 9, Section 903: Odorous or Other Nuisance Air Pollutants

"An emission into the atmosphere of odorous or other air pollutants from any source in any quantity and of any characteristic, and duration which is, or is likely to be injurious to the public health or welfare, or which interferes with the reasonable enjoyment of life or property is prohibited [20 DCMR 903.1]" is applicable to all sources. It is contained in Condition II(c) of the permit.

40 CFR Part 60 Subpart EE-Standard of Performance for Surface Coating of Metal Furniture:

Except for record keeping, this subpart does not apply to the owner or operator of a metal furniture surface coating operation that uses less than 3,842 liters (1,015 gallons) of coating per year for metal furniture coating. Per 20 DCMR 60.310, purchase or inventory records of annual coating usage must be maintained at the source for a period of at least two (2) years. The permit language has been written to include a requirement to not exceed this usage level as well as to keep appropriate records to ensure compliance with that requirement.

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40 CFR 63, Subpart HHHHHH – National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources:

This subpart applies to paint stripping and miscellaneous surface coating operations at area sources. This subpart is not applicable to the paint booth in question because it does not perform paint stripping using MeCl, does not paint any motor vehicles or mobile equipment, and does not use spray guns to perform coating using coatings that contain any target HAP (specifically chromium, lead, manganese, nickel, or cadmium). The appropriate permit conditions are included in the permit to place to ensure that none of these Subpart HHHHHH triggers are reached, including a requirement to not use spray guns.

40 CFR 63 Subparts MMMM, PPPP, QQQQ, RRRR: National Emission Standards for Hazardous Air Pollutants:

Subparts MMMM, PPPP, QQQQ, and RRRR relate to NESHAP requirements for surface coatings of miscellaneous metal parts and products, plastic parts and products, wood building products, and metal furniture, respectively. None of these subparts are applicable to this paint spray booth as the facility does not use coatings and/or other materials used in painting operations in quantities that meet or exceed the defined minimum limits necessary to trigger applicability of the said Subparts.

RECOMMENDATIONS

The proposed project and attached permit comply with all applicable federal and District air pollution control laws and regulations.

Public comments for the permit action will be solicited from April 8 through May 9, 2016. AQD will resolve any comments received before issuing the permit, and if no comments are received, I recommend that permit #7063 be issued in accordance with 20 DCMR 200.2 (and incorporating requirements that would have been established under 20 DCMR 200.1 had the permit been obtained before installation.

ATH

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