

GOVERNMENT OF THE DISTRICT OF COLUMBIA


District Department of the Environment




Air Quality Division

**CHAPTER 2 TECHNICAL SUPPORT MEMORANDUM**

TO: File

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

FROM: John Nwoke   
Environmental Engineer

SUBJECT: **Pepco –Benning Road Service Center  
Permit #6726  
Permit to Operate a Spray Paint Booth**

DATE: March 28, 2014

---

**BACKGROUND INFORMATION**

Potomac Electric Power Company (Pepco) submitted an application to operate an existing paint booth in its Benning Road Service Center facility located at 3400 Benning Road, NE Washington, DC. The application was received on March 19, 2013 for one standard paint booth. The paint booth was included in Pepco's Title V Operating permit which has since been modified to exclude permit conditions relating only to the boilers, but not other minor sources, such as the paint booth, emergency generators or refueling islands. . This Chapter 2 permit is required to cover the operation of the existing paint booth as a solely separate activity.

The Air Quality Division (AQD) has determined that the facility is an existing source of paint stripping and surface coating because paint booth activity was included in the permit application for Pepco's Title V Operating Permit renewal application that was submitted in 2004. This date is prior to September 17, 2007 the trigger date for classification of a source as a "new source" under 40 CFR 63, Subpart HHHHHH. Subpart HHHHHH is discussed further below.

The Company has not requested that any of the materials submitted with this application be held confidential.

**TECHNICAL INFORMATION**

The equipment at this site includes one standard paint booth. There will be no use of methylene chloride (MeCl) at this facility. Only manual sanding is used to remove paints. The company uses high volume low pressure (HVLP) spray guns which are cleaned in an enclosed Gun Cleaning Station.



## **CHAPTER 2 TECHNICAL MEMORANDUM**

### **Pepco Benning Service Center (BSC) Spray Paint Booth**

#### **Permit # 6726 to Operate a Paint Booth**

March 28, 2014

Page 2

## **REGULATORY REVIEW**

### **Chapter 2, Section 200: General Permit Requirements:**

A spray paint booth is a pollution source since most non-auto body paints contain volatile organic compounds. Thus a Chapter 2 permit is required.

### **Chapter 6: Particulates:**

The visible emission limitation of 20 DCMR 606 is applicable to this facility. Proper operation of the equipment would preclude any visible emissions, even during startup or shutdown, so Condition II(d) requires that no visible emissions be emitted- a more stringent requirement under 20 DCMR 201.

### **Chapter 7: Volatile Organic Compounds and Hazardous Air Pollutants**

The requirements of 20 DCMR 700 limiting emissions from the paint booth are included in the permit. Appropriate record keeping requirements are also included in the permit. Because the facility is not an auto body shop, mobile equipment coating is prohibited based on 20 DCMR 799. The need for Department approval for use of adhesive, sealants, adhesive primer, and sealant primer is covered in 20 DCMR 743-749, as applicable.

### **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(b) of the permit.

### **Other Regulations**

40 CFR 63, Subpart HHHHHH, “National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources” (also known as the “Auto Body MACT”) is not applicable to the facility for the following reasons [see 40 CFR 63.11170 for the applicability provisions of the rule]:

1. Review of the application has not shown that chemical paint strippers containing methylene chloride are in use at the site. Thus, the requirements for paint stripping are generally not applicable in this case. Condition III(a) of the permit was developed to ensure that no methylene chloride containing strippers are used at the facility.
2. The facility does not perform spray application of coatings to motor vehicles or mobile equipment as described in 40 CFR 63.11170(a)(2). Condition III(c) of the permit was added to ensure that this continues to be the case.

**CHAPTER 2 TECHNICAL MEMORANDUM**  
**Pepco Benning Service Center (BSC) Spray Paint Booth**  
**Permit # 6726 to Operate a Paint Booth**  
March 28, 2014  
Page 3

3. The surface coating product and the cleaning solvent (paint thinner) in use at the facility do not contain any of the target HAPs. Condition III(f)(1) was added to the permit to ensure that this remains the case in all spray applications.

Although not technically applicable, the paint booth meets the requirements of 40 CFR 63.11173(e)(2)(ii). The paint booth is a commercially built down draft paint booth. This requirement was included in the permit as Condition III(g) under 20 DCMR 201 authority.

Similarly, Condition III(g)(1) was written to allow the facility to use only exhaust filters with 98% or higher capture efficiency consistent with 40 CFR 63.11173(e)(2)(i).

Related record keeping requirements were included in Condition V of the permit. Record retention requirements will be for three years, consistent with 20 DCMR 500.8.

Notification and reporting requirements are contained in Conditions VI(a) and (b) of the permit.

**RECOMMENDATIONS**

The public notice is scheduled to be published in the D.C. Register on March 28, 2014.

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

If no public comment has been received by the end of the comment period, it is recommended that the permit be issued.

JCN

