


GOVERNMENT OF THE DISTRICT OF COLUMBIA  
Department of Energy and Environment

**CHAPTER 2 TECHNICAL SUPPORT MEMORANDUM**

TO: Stephen S. Ours, P.E.  
Chief, Permitting

FROM: Wyatt E. Bohmann,  
Environmental Engineer 

SUBJECT: **Capitol Paving of D.C., Inc.**  
**Permit No. 7311 to Operate a Cold Solvent Degreasing Unit**

DATE: June 16, 2022

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**BACKGROUND INFORMATION**

On November 23, 2021, Capitol Paving of D.C., Inc. submitted an air permit application to the Air Quality Division (AQD) of the Department of Energy and Environment (DOEE) to operate an existing cold solvent Safety-Kleen Model 30 degreaser. The facility where the degreaser is located is 1525 W Street NE, Washington DC. The applicant has not requested that any of the materials submitted with the application be held confidential.

**TECHNICAL INFORMATION**

Capitol Paving of D.C. Inc. applied for a permit to operate an existing cold solvent Safety-Kleen Model 30 degreaser. The degreaser is defined as a remote reservoir cold cleaning machine in which the solvent is stored in an attached 30-gallon drum below the sink. The sink, with a load capacity of 25 lbs, comes with an attached cover to enclose the degreaser while not in use. The solvent the permittee intends to use in conjunction with the degreaser is Safety-Kleen Premium Solvent.

**REGULATORY REVIEW**

20 DCMR Chapter 2, Section 200: General Permit Requirements

The cold cleaning machine has the potential to emit volatile organic compounds, thus a Chapter 2 permit is required for this source.

20 DCMR Chapter 7, Section 764: Solvent Cleaning – Cold Cleaning

The solvent cleaning control requirements of 20 DCMR 764 are applicable to this cold cleaning machine. The operational requirements of this regulation are found in Conditions III(a) through (d) of the permit document. Due to the equipment being classified as a remote reservoir unit, certain regulations that only apply to immersion type units have been omitted. The facility must monitor the site for compliance per Conditions IV(a) and (b)

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20 DCMR 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. This requirement is contained in Condition II(a) of the permit.

40 CFR 63, Subpart T: National Emission Standards for Halogenated Solvent Cleaning

The applicant does not intend to use any of the hazardous air pollutant (HAP) solvents covered by the halogenated solvent cleaning NESHAP. As such, this regulation is not applicable. To ensure that this remains the case, Condition II(b) has been added to the permit to clarify that these solvents must not be used in the degreaser unit.

### **RECOMMENDATIONS**

The draft permit will be published in the D.C. Register and on the Department’s website on for a thirty-day public comment period beginning July 1, 2022 and concluding on August 1, 2022.

The existing degreaser and the attached permit comply with all applicable federal and District air pollution control laws and regulations. It is recommended that the attached permit be promptly issued following the completion of the public review period, if no adverse comments are received. If adverse comments are received, they will be addressed before any final action is taken on the permit application.

WEB