

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Energy and Environment

COMMENT RECONCILIATION MEMORANDUM

TO: File

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

Abraham T. Hagos *ATH*
Environmental Engineer

**SUBJECT: Comment Reconciliation Memo – Y & G Auto Body Shop LLC
Draft Permit No. 6786-R1 to Operate an Existing Automotive Paint Spray
Both at 1851 Adams Street NE**

DATE: January 25, 2019

BACKGROUND

On May 25, 2016, a renewal permit application was received from Y & G Auto Body Shop LLC to operate an existing automotive paint spray booth located at 1851 Adams Street NE, Washington DC, 20018. A revised application was received on April 19, 2018. Following a finding that the outlet stack did not comply with regulatory requirements, the outlet was modified and photos of the modified stack were received on June 11, 2018. Finally, to clarify discrepancies in the start-up date of the facility on the application form, Ms. Ros Givens made corrections to Sections I(9) and I(10) of the permit application on August 7, 2018.

The application covers a cross flow Blowtherm automotive paint spray booth previously permitted under permit 6786, issued January 14, 2014.

On August 24, 2018, the Air Quality Division (AQD) of the Department of Energy and Environment (DOEE) issued a draft permit for public review for a period of 30 days, ending September 24, 2018. This draft permit incorporated regulatory changes that had occurred since issuance of the previous permit in 2014.

AQD did not receive any comments during the comment period, but did receive a request for a public hearing from Mr. Merrit Drucker. AQD granted the request for a public hearing and published advance notice of the public hearing in the D.C. Register and on the DOEE website on November 9, 2018. The public hearing was held on December 11, 2018. Mr. Merrit Drucker was the only attendee to provide testimony at the hearing.

The following table addresses the comments made by Mr. Drucker during the hearing.

**AIR QUALITY DIVISION RESPONSES TO COMMENTS
Y & G Auto Body Shop LLC**

Draft Permit No. 6786-R1 to Operate an Existing Automotive Paint Spray Booth at 1851 Adams Street NE

January 25, 2019

Page 2

Comment No.	Comment or Comment Summary	AQD Response
1	<p>“My primary concern is the release of VOCs to the air, with the resultant negative effects on human health and the environment. As the proposed permit is written, there are no emissions controls for VOCs at all.</p> <p>To prevent the releases of VOCs to the ambient air, I am asking that some type of emissions control system be installed. A control system should include:</p> <ol style="list-style-type: none"> 1. A filter system with a VOC removal efficiency of at least 98%. 2. A filter system that requires the use of activated charcoal filters. 3. A requirement that the operator install the Blowtherm Green Depurator Unit, which, when combined with the 98% efficient filters will result in a high removal efficiency. Please see the link below to the manufacturer’s web site: https://www.blowtherm-usa.com/Products/GreenDepuratingUnit.aspx 4. Alternatively, some type of thermal destruction technique could be used to destroy the VOCs before they are emitted to the atmosphere.” 	<p>The commenter is correct to identify volatile organic compounds (VOCs) as the primary pollutant of concern from automotive painting operations. The commenter is also correct in his assertion that the permit does not require the installation and operation of any add-on control device for VOCs.</p> <p>However, add-on controls, such as charcoal filters (including the referenced Blowtherm Green Depurating Unit) and thermal oxidizers, while effective, are costly and are not the only way to reduce VOC emissions from painting operations. Another, highly effective way to reduce VOC emissions is to reduce the amount of VOC in the paints and solvents being used. The District’s air quality regulations have adopted this latter method to drastically reduce VOC emissions from automotive painting operations.</p> <p>In December 2016, DOEE adopted updated automotive painting regulations that incorporated the most stringent limits on VOC content in automotive paints and solvents in the U.S. These limits were designed to be protective of public health and the environment and are fully incorporated in the draft permit. AQD enforcement staff regularly inspect automotive painting facilities to ensure that permittees are complying with permit and regulatory requirements.</p> <p>AQD has authority to require installation of additional</p>

AIR QUALITY DIVISION RESPONSES TO COMMENTS

Y & G Auto Body Shop LLC

Draft Permit No. 6786-R1 to Operate an Existing Automotive Paint Spray Booth at 1851 Adams Street NE

January 25, 2019

Page 3

Comment No.	Comment or Comment Summary	AQD Response
2	"As a permit condition, the applicant should be required to have a valid and current business license and certificate of occupancy."	control devices if warranted, but in this case, no such control devices are warranted. No business is allowed to operate without a valid and current business license and certificate of occupancy in the District of Columbia. This is not, however, an air quality regulation requirement, and is enforced by a different agency (the Department of Consumer and Regulatory Affairs). It is therefore not included as a requirement in air quality permits.
3	"As a condition of this permit, the operator should be required to install an air monitor between the facility at 1851 Adams Street, NE and the nearest school."	There are no federal or District regulations requiring installation of air monitors between automotive painting operations and the nearest school. There are furthermore no reasons to believe that Y&G Auto Body Shop LLC, if complying with the requirements of District's air quality regulations, as incorporated into the draft permit, would create a condition of air pollution inimical to public health, welfare or the environment. As such, AQD has no basis to incorporate into the permit a requirement to install or operate such a costly monitoring station. As a result, no such requirement will be added.

RECOMMENDATIONS

We recommend issuance of Chapter 2 permit No. 6786-R1, as originally drafted.

ATHASSO

07917

