# March 21, 2023

Catherine L. Szpindor,

Chief Administrative Officer

U.S. House of Representatives

The Capitol HB-28

Washington, DC 20515

**Subject: Permit No. 7338 to Construct and Operate a Non-Automotive Paint Spray Booth at the Rayburn House Office Building, Washington DC**

Dear Ms. Szpindor:

Pursuant to sections 200.1 and 200.2 of Title 20 of the District of Columbia Municipal Regulations (20 DCMR), a permit from the Department of Energy and Environment (“the Department”) shall be obtained before any person may construct and operate a stationary source in the District of Columbia. The application of Office of the Chief Administrative Officer (“the Permittee”) to construct and operate a non-automotive paint spray booth at the Rayburn House Office Building, Washington DC 20515, per the submitted plans and specifications, dated August 24, 2022, is hereby approved, subject to the following conditions:

I. General Requirements:

1. The paint spray booth shall be constructed, maintained, and operated in accordance with the air pollution control requirements of 20 DCMR.

b. This permit expires on March 20, 2028 [20 DCMR 200.4]. If continued operation after this date is desired, the Permittee shall submit an application for renewal by December 20, 2027.

c. Construction or operation of equipment under the authority of this permit shall be considered acceptance of its terms and conditions.

d. The Permittee shall allow authorized officials of the District, upon presentation of identification, to:

1. Enter upon the Permittee’s premises where a source or emission unit is located, an emissions related activity is conducted, or where records required by this permit are kept;

2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of this permit;

3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

4. Sample or monitor, at reasonable times, any substance or parameter for the purpose of assuring compliance with this permit or any applicable requirement.

f. This permit shall be kept on the premises and produced upon request.

g. Failure to comply with the provisions of this permit may be grounds for suspension or revocation. [20 DCMR 202.2]

II. Emission Limits:

1. Except for emissions resulting from operations subject to Conditions II(d), II(e), and III(b), the Permittee shall not discharge into the atmosphere more than fifteen (15) pounds of volatile organic compound (VOC) emissions in any one (1) day, nor more than three pounds (3 lb.) in any one (1) hour, from all operations that occur in the equipment covered by this permit and any other combination of articles, machines, units, equipment, or other contrivances at a facility, not covered by a section of 20 DCMR Chapter 7 other than Section 700, unless the uncontrolled VOC emissions are reduced by at least ninety percent (90%) overall capture and control efficiency. [20 DCMR 700.1 and 700.2]
2. 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]
3. Visible emissions shall not be emitted into the outdoor atmosphere from the paint spray booth. [20 DCMR 107 and 606]
4. The Permittee shall not discharge into the atmosphere more than forty pounds (40 lb.) of non-photochemically reactive solvents in any one (1) day, nor more than eight pounds (8 lb.) in any one (1) hour, from any article, machine, equipment, or other contrivance, unless the uncontrolled organic emissions are reduced by at least eighty-five percent (85%). [20 DCMR 708.2]
5. Emissions of VOCs from the use of any cleaning solvent, except those listed in Conditions II(e)(1) through (5) below (which are included in the accounting for compliance with Condition II(a)) shall be maintained below fifteen (15) pounds in any one (1) day from all such sources at the facility. [20 DCMR 201 and 20 DCMR 770.1]
6. Emissions from cleaning and surface preparation operations subject to Condition III(b);
7. Emissions from products used to strip cured inks, coatings, and adhesives;
8. Emissions from cleaning products used for janitorial purposes, including graffiti remover products;
9. Emissions from products used to clean resin, coating, ink, and adhesive mixing, molding, and application equipment; and
10. Emissions from cleaning and surface preparation operations related to application of coatings subject to regulation under 20 DCMR 773 to 778 (AIM) to the extent the coatings are used as architectural and industrial maintenance coatings.

III. Operational Limits:

1. No chemical strippers containing methylene chloride (MeCl) shall be used for paint stripping at the facility. [20 DCMR 201]
2. Adhesives, sealants, adhesive primers, or sealant primers shall not be used in the equipment unless they comply with the following conditions: [20 DCMR 743 through 749]

1. Any person who supplies, sells, offers for sale, or uses or applies adhesives, sealants, or adhesive or sealant primers shall comply with the following, except as provided in Condition III(b)(2). Unless otherwise specified elsewhere in the permit, this permit does not authorize the Permittee to manufacture any adhesive, sealant, adhesive primer, or sealant primer.: [20 DCMR 201 and 20 DCMR 743.1]

A. No person shall sell, supply, offer for sale, use or apply any adhesive, sealant, adhesive primer, or sealant primer manufactured on and after January 1, 2012, within the District of Columbia in excess of the applicable volatile organic compound ( VOC) content limits specified in the following Table of Standards, except as provided in Conditions III(b)(1)(D) and III(b)(2) [20 DCMR 744.1 and 744.2]:

**Table of Standards. VOC Content Limits for Adhesives, Sealants, Adhesive Primers, Sealant Primers and Adhesives Applied to Particular Substrates.**

| **Adhesive, sealant, adhesive primer or sealant primer category** | **VOC content limit (grams VOC per liter#)** |
| --- | --- |
| **CATEGORY 1: ADHESIVES** | **VOC Limits**  **(g/L)** |
| ABS welding | 400 |
| Ceramic tile installation | 130 |
| Computer diskette jacket manufacturing | 850 |
| Contact or contact bond | 250 |
| Cove base installation | 150 |
| CPVC welding | 490 |
| Indoor floor covering installation | 150 |
| Metal to urethane/rubber molding or casting | 850 |
| Motor vehicle | 250 |
| Motor vehicle weatherstrip | 750 |
| Multi-purpose construction | 200 |
| Non-membrane roof installation/repair | 300 |
| Outdoor floor covering installation | 250 |
| Plastic cement welding (except ABS, PVC or CPVC) | 510 |
| PVC welding | 510 |
| Single-ply roof membrane installation/repair | 250 |
| Structural glazing | 100 |
| Thin metal laminating | 780 |
| Tire retread | 100 |
| Perimeter bonded sheet vinyl flooring installation | 660 |
| Waterproof resorcinol glue | 170 |
| Sheet-applied rubber installation | 850 |
| **CATEGORY 2: SEALANTS** | **VOC Limits in (g/L)** |
| Architectural | 250 |
| Marine deck | 760 |
| Non-membrane roof installation / repair | 300 |
| Roadway | 250 |
| Single-ply roof membrane | 450 |
| Other | 420 |
| **CATEGORY 3: ADHESIVE PRIMERS** | **VOC Limits in (g/L)** |
| Automotive glass | 700 |
| Motor vehicle glass bonding | 900 |
| Plastic cement welding | 650 |
| Single-ply roof membrane | 250 |
| Traffic marking tape | 150 |
| Other | 250 |
| **CATEGORY 4: SEALANT PRIMERS** | **VOC Limits in (g/L)** |
| Architectural – non-porous material | 250 |
| Architectural – porous material | 775 |
| Marine deck | 760 |
| Other | 750 |
| **CATEGORY 5: ADHESIVES APPLIED TO PARTICULAR SUBSTRATES** | **VOC Limits in (g/L)** |
| Flexible vinyl | 250 |
| Fiberglass | 200 |
| Reinforced plastic composite | 200 |
| Metal | 30 |
| Porous material (other than wood) | 120 |
| Rubber | 250 |
| Wood | 30 |
| Other substrates | 250 |

# The VOC content is determined as the weight of VOCs, less water and exempt compounds as specified in 20 DCMR 747.

B. The VOC content limits in the Table of Standards in Condition III(b)(1)(A) for adhesives applied to particular substrates (such as, Category 5), shall apply as follows [20 DCMR 744.3]:

i. If an operator uses an adhesive or sealant subject to a specific VOC content limit for such adhesive or sealant in the Table of Standards in Condition III(b)(1)(A), such specific limit applies rather than an adhesive-to-substrate limit; and

ii. If an adhesive is used to bond dissimilar substrates together, the applicable substrate category with the highest VOC content shall be the limit for such use.

C. Except as provided in Conditions III(b)(1)(D) and III(b)(2), any person subject to Condition III(b) using a surface preparation or cleanup solvent shall [20 DCMR 744.4]:

i. Except as provided in Condition III(b)(1)(C)(ii) for single-ply roofing, not use materials containing VOCs for surface preparation, unless the VOC content of the surface preparation solvent is less than seventy grams per liter (70 g/L);

ii. If a surface preparation solvent is used in applying single-ply roofing, not use materials for surface preparation containing VOCs, unless the composite vapor pressure of the surface preparation solvent, excluding water and exempt compounds, does not exceed forty-five millimeters of mercury (45 mm. Hg) at twenty degrees Celsius (20º C) or sixty-eight degrees Fahrenheit (68° F);

iii. Except as provided in Condition III(b)(1)(C)(iv), not use materials containing VOCs for the removal of adhesives, sealants, or adhesive or sealant primers from surfaces, other than spray application equipment, unless the composite vapor pressure of the solvent used, excluding water and exempt compounds, is less than forty-five millimeters of mercury (45 mm. Hg) at twenty degrees Celsius (20º C) or sixty-eight degrees Fahrenheit (68° F); and

iv. Remove an adhesive, sealant, adhesive primer, or sealant primer from the parts of spray application equipment by:

1. An enclosed cleaning system, or an equivalent cleaning system as determined by the SCAQMD’s “General Test Method for Determining Solvent Losses from Spray Gun Cleaning Systems,” dated October 3, 1989;

2. Using a solvent with a VOC content of seventy grams (70 g) of VOC per liter of material, or less; or

3. Soaking parts containing dried adhesive in a solvent as long as the composite vapor pressure, excluding water and exempt compounds, of the solvent is nine and one half millimeters of mercury (9.5 mm. Hg) at twenty degrees Celsius (20º C) or sixty-eight degrees Fahrenheit (68° F) or less and is kept in a closed container, which shall be closed except when depositing or removing parts of materials from the container.

D. Any person using an adhesive, sealant, adhesive primer, or sealant primer subject to Condition III(b) who wishes to comply with Conditions III(b)(1)(A) and (C) with the use of an add-on control device in accordance with 20 DCMR 744.5 shall first obtain a permit pursuant to 20 DCMR 200, which shall specify the conditions under which this compliance method may be used. [20 DCMR 744.5 and 20 DCMR 200]

E. Any person using adhesives, sealants, adhesive primers, sealant primers, or surface preparation or cleanup solvents subject to Condition III(b) shall [20 DCMR 744.6]:

i. Store or dispose of all absorbent materials, such as cloth or paper, which are moistened with adhesives, sealants, primers, or solvents subject to Condition III(b), in non-absorbent containers that shall be closed except when placing materials in or removing materials from the container;

ii. Store all VOC-containing adhesives, sealants, adhesive primers, sealant primers, surface preparation and cleanup solvents, and related waste materials in closed containers;

iii. Ensure that mixing and storage containers used for VOC-containing adhesives, sealants, adhesive primers, sealant primers, surface preparation and cleanup solvents, and related waste materials are kept closed at all times except when depositing or removing these materials;

iv. Minimize spills of VOC-containing adhesives, sealants, adhesive primers, sealant primers, surface preparation and cleanup solvents, and related waste materials;

v. Convey VOC-containing adhesives, sealants, adhesive primers, sealant primers, surface preparation and cleanup solvents, and related waste materials from one location to another in closed containers or pipes; and

vi. Minimize VOC emission from cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

F. No person shall solicit, require the use or specify the application of any adhesive, sealant, adhesive primer, sealant primer, surface preparation or cleanup solvent if such use or application results in a violation of the provisions of 20 DCMR Chapter 7. The prohibition of this condition shall apply to all written or oral contracts under which any adhesive, sealant, adhesive primer, sealant primer, and surface preparation or cleanup solvent subject to Condition III(b) is to be used at any location in the District of Columbia. [20 DCMR 744.7]

2. Exemptions and exceptions to Condition III(b) are as follows: [20 DCMR 745]

A. Condition III(b) shall not apply to the use of the following compounds: [20 DCMR 745.1]

i. Adhesives, sealants, adhesive primers, or sealant primers being tested or evaluated in any research and development, quality assurance or analytical laboratory, provided records are maintained as required in Condition III(b)(5);

ii. Adhesives, sealants, adhesive primers, and sealant primers that are subject to VOC standards in 20 DCMR § 720 (Consumer Products – VOC Standards);

iii. Adhesives and sealants that contain less than twenty grams (20 g) of VOC per liter of adhesive or sealant, less water and less exempt compounds, as applied;

iv. Cyanoacrylate adhesives;

v. Adhesives, sealants, adhesive primers, or sealant primers that are sold or supplied by the manufacturer or supplier in containers with a net volume of sixteen (16) fluid ounces or less, or a net weight of one pound (1 lb) or less, except plastic cement welding adhesives and contact adhesives; or

vi. Contact adhesives that are sold or supplied by the manufacturer or supplier in containers with a net volume of one gallon (1 gal) or less.

B. The requirements of Condition III(b) shall not apply to the use of adhesives, sealants, adhesive primers, sealant primers, or surface preparation and cleanup solvents in the following operations [20 DCMR 745.2]:

i. Tire repair operations, provided the label on the adhesive states “For Tire Repair Only”;

ii. In the assembly, repair, and manufacture of aerospace components or undersea-based weapon system components;

iii. Medical equipment manufacturing; or

iv. Plaque laminating operations in which adhesives are used to bond clear, polyester acetate laminate to wood with lamination equipment installed before July 1, 1992, provided that records are maintained in accordance with Condition III(b)(2)(E).

C. The provisions of Condition III(b) (except Condition III(b)(2)(E)) shall not apply to a person who uses or applies any adhesive, sealant, adhesive primer, and sealant primer at a stationary source if the total VOC emissions from all adhesives, sealants, adhesive primers, and sealant primers used at the stationary source are less than two hundred pounds (200 lb) per calendar year, or an equivalent volume. [20 DCMR 745.3]

D. The provisions of Conditions III(b)(1)(A) and (C) shall not apply to the use of any adhesives, sealants, adhesive primers, sealant primers, cleanup solvents, and surface preparation solvents, provided the total volume of non-complying adhesives, sealants, primers, cleanup and surface preparation solvents applied facility-wide at a stationary source does not exceed fifty-five gallons (55 gal) per calendar year. [20 DCMR 745.4]

E. Any person claiming an exemption pursuant to Conditions III(b)(2)(B)(iv) through III(b)(2)(D) shall record and maintain monthly operational records sufficient to demonstrate compliance, and in accordance with Conditions III(b)(3) and (4). [20 DCMR 745.5]

F. Condition III(b) shall not apply to a distributor who sells, supplies or offers for sale in the District of Columbia any adhesive, sealant, adhesive primer, or sealant primer that does not comply with Condition III(b)(1)(a) provided that such distributor makes and keeps records demonstrating:

i. The adhesive, sealant, adhesive primer, or sealant primer is intended for shipment and use outside of the District of Columbia; and

ii. The distributor has taken reasonable precautions to assure that the adhesive, sealant, adhesive primer, or sealant primer is not distributed to, or within, the District of Columbia.

G. Condition III(b)(2)(F) shall not apply to any adhesive, sealant, adhesive primer, or sealant primer that is sold, supplied, or offered for sale by any person to a retail outlet in the District of Columbia.

3. Each person subject to Condition III(b) shall maintain records demonstrating compliance with the regulations, including, but not limited to, the following information [20 DCMR 746.1]:

A. A list of each adhesive, sealant, adhesive primer, sealant primer cleanup solvent, and surface preparation solvent in use and in storage;

B. A data sheet or material list that provides the material name, manufacturer identification, and material application;

C. Catalysts, reducers, or other components used and the mix ratio;

D. The VOC content of each product as supplied;

E. The final VOC content or vapor pressure, as applied; and

F. The monthly volume of each adhesive, sealant, adhesive primer, sealant primer, cleanup or surface preparation solvent used.

4. All records made to determine compliance with Condition III(b) shall be maintained for five (5) years from the date such record is created and shall be made available to the District of Columbia within ninety (90) days of a request. [20 DCMR 746.3]

5. For adhesives, sealants, adhesive primers, and sealant primers subject to the laboratory testing exemption pursuant to Condition III(b)(2)(A)(i), the person conducting the testing shall make and maintain records of all such materials used, including, but not limited to, the product name, the product category of the material or type of application, and the VOC content of each material. [20 DCMR 746.4]

6. Testing and calculations to determine compliance with Condition III(b) shall be performed as specified in 20 DCMR 747.

7. A person shall not apply a VOC-containing adhesive, adhesive primer, sealant, or sealant primer at a stationary source unless applied by one (1) of the following application methods using equipment operated in accordance with the specifications of the equipment manufacturer [20 DCMR 749.1]:

A. Electrostatic application;

B. High volume low pressure (HVLP) spraying;

C. Flow coating;

D. Roller coating or hand application methods, including non-spray application methods similar to hand or mechanically powered caulking gun, brush coating, or direct hand application methods;

E. Dip coating (including electrodeposition coating):

F. Airless spraying;

G. Air-assisted airless spraying; or

H. Other adhesive application method that a person has demonstrated and the Department has determined achieves a transfer efficiency equivalent to or better than that achieved by HVLP spraying.

c. Mobile equipment, as defined in 20 DCMR 799, shall not be coated in the spray paint booth. [20 DCMR 201]

d. The exhaust stacks shall be designed with sufficient height and configuration so as to assure compliance with Condition II(b). [20 DCMR 201]

e. The coatings applied shall be by one or more of the following methods [20 DCMR 201]:

1. Powder coating;

2. Hand-held, non-refillable aerosol containers;

3. Non-atomizing application technology (paint brushes, rollers, hand wiping, flow coating, dip coating, touch-up markers, or marking pens); or

4. Other non-atomizing application technology approved by the Department to not be covered by 40 CFR 63, Subpart HHHHHH or another regulation not addressed in this permit; or

5. High volume low pressure (HVLP) spray guns.

f. Whenever spray guns are used [20 DCMR 201]:

1. The coatings used shall not contain any compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd); and

2. Cleaning of spray guns shall be performed by one or a combination of the following methods:

A. Use of an enclosed spray gun cleaning system that is kept closed when not in use;

B. Use of an unatomized discharge of cleaning solvent into a paint waste container that is kept closed when not in use;

C. Disassembly of the spray gun and cleaning in a vat that is kept closed when not in use; or

D. Use of an atomized spray into a paint waste container that is fitted with a device designed to capture atomized solvent emissions.

g. The paint spray booth shall meet the following specifications [20 DCMR 201]:

1. The unit shall be fitted with a type of filter technology that is demonstrated to achieve at least ninety eight-percent (98%) capture of paint overspray.
2. The exhaust filters shall be replaced as specified by manufacturers' specifications and as necessary to ensure compliance with Conditions II(b) and (c) of this permit.
3. The unit shall be constructed with a full roof and must be ventilated at negative pressure so that air is drawn into the front opening any openings in the booth walls.
4. The unit shall be maintained and operated at all times in accordance with manufacturer's recommendations.

h. The Permittee shall comply with the following housekeeping and pollution prevention measures [20 DCMR 771.3]:

1. Store all VOC containing materials, coatings, solvents, industrial cleaning solvents, inks, adhesives, and waste materials in closed containers, except when depositing or removing these materials;

2. Minimize spills of VOC containing materials;

3. Clean up spills immediately;

4. Convey any VOC containing materials, coatings, solvents, industrial cleaning solvents, inks, adhesives, and waste materials in closed containers or pipes;

5. Close mixing vessels which contain VOC containing materials, coatings, solvents, industrial cleaning solvents, inks, and adhesives except when they are specifically in use;

6. Minimize emissions of VOCs during cleaning of storage, mixing, conveying, and other equipment; and

7. Store cloth and paper, or other absorbent applicators, moistened with coatings, solvents or cleaning solvents in closed, nonabsorbent, nonleaking containers.

i. At all times, including periods of startup, shutdown, and malfunction, the owner shall, to the extent practicable, maintain and operate the spray painting equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [20 DCMR 201]

j. The Permittee shall use less than 3,842 liters (1,015 gallons) of coatings (as applied) for coating metal furniture per calendar year at the facility (all metal furniture coating occurring at the facility, not just in this booth). [20 DCMR 201, 20 DCMR 205.2 and 40 CFR 60.310(c)]

IV. Monitoring and Testing Requirements:

a. The Permittee shall monitor the contents of any chemical strippers used at the facility to ensure that they do not contain MeCl.

b. The Permittee shall track the VOC content of all paints and coatings used at the facility, as applied, to ensure compliance with Condition II(a). If applied, unadulterated, as the coating is obtained from the manufacturer, documentation provided by the manufacturer may be used to determine the VOC content.

Whenever such information is not available from the manufacturer or whenever a paint or coating is not applied as obtained from the manufacturer, the following method shall be used to determine the VOC content:

The mass of VOC per combined volume of VOC and coating solids, less water and exempt compounds shall be calculated, in pounds per gallon, by the following equation. To convert from grams per liter to pounds per gallon (lb/gal), multiply the result (VOC content) by 8.345 x 10-3 (lb/gal/g/l):

*VOC* = (Wv - Ww - Wec )

(V - Vw - Vec )

where:

VOC = VOC content in grams per liter (g/l) of coating less water and non-

VOC solvents;

Wv = Mass of total volatiles, in grams;

Ww = Mass of water, in grams;

Wec = Mass of exempt compounds, in grams;

V = Volume of coating, in liters;

Vw = Volume of water, in liters; and

Vec = Volume of exempt compounds, in liters

c. The Permittee shall maintain an awareness of the area to ensure that the odor and nuisance air pollutant requirements of Condition II(b) are met.

d. The Permittee shall monitor the emission point from the spray booth to ensure that the requirements of Condition II(c) are met.

e. The Permittee shall monitor the material safety data sheets or other paint, coating adhesive, sealant, adhesive primer, or sealant primer specification sheets to ensure compliance with Conditions III(b) and III(f).

f. The Permittee shall monitor the types of spray booth filters purchased and their replacement dates to ensure that all filters used meet the requirements of Conditions III(g)(1) and (2).

g. The Permittee shall monitor the maintenance and operational status of the spray booth and the activities performed in the spray booth and at the facility to ensure compliance with the requirements of Conditions III(c), (e), (f), (g), (h), and (i).

h. The Permittee shall monitor the total quantity of coatings, as applied, to metal furniture at the facility to ensure compliance with Condition III(j). As an alternative to monitoring coatings, as applied, to metal furniture specifically, the Permittee may monitor total quantities of coatings used at the facility to show that total quantities used do not exceed the limit in Condition III(j).

i. The Permittee shall monitor the identity and total quantity of any non-photochemically reactive solvents, as applied, at the facility to ensure compliance with Condition II(d).

j. The Permittee shall monitor the identity and total quantity of any solvents used at the facility (other than those monitored pursuant to Condition IV(i)) and shall categorize them as being subject to either Condition II(a) or II(e). Such monitoring shall be sufficient to, in combination with the information found from Condition IV(b), ensure compliance with Conditions II(a) and (e).

V. Record Keeping Requirements:

The Permittee shall maintain the following records for not less than three years from the date of each record. [20 DCMR 500.8]

1. The Permittee shall maintain records of the types of chemical paint strippers used at the facility as well as their chemical make-up to document compliance with Condition III(a).

b. The Permittee shall maintain records of the quantity, type, and VOC content of all paints and refinishing coatings used at the facility, as applied. The quantities of each coating shall be updated daily, and summed monthly. Additionally, one of the following options shall be implemented:

1. If, in order to comply with Condition III((j), per Condition IV(h), the Permittee monitors the quantity of coatings applied to metal furniture separately, this information shall also be recorded monthly and a calendar year sum shall be determined each January for the previous calendar year and recorded, or

2. If, in order to comply with Condition III(j), per Condition IV(h), the Permittee monitors total quantities of coatings used at the facility, the quantity of all coatings combined used shall be summed each January for the previous calendar year and recorded.

c. The Permittee shall maintain records of all cleaning solvents used and categorize them as subject to Condition II(a), II(d), II(e), or III(b). Records shall be maintained in such a way as to allow for the determination and documentation of compliance with those conditions.

d. Based on the monitoring and calculations required under Condition IV(b) and IV(j) and the records kept under Conditions V(b) and V(c), the Permittee shall determine and keep records of the VOCs emitted from this equipment, in combination with similar VOC emitting equipment at the facility to ensure compliance with Condition II(a).

e. The Permittee shall maintain records of the type(s) and target hazardous air pollutant (HAP) contents of coatings used in any spray guns to document compliance with Condition III(f)(1).

f. The Permittee shall maintain records of the specifications and replacement dates of spray booth filters to document compliance with Condition III(g)(1) and (2).

g. The Permittee shall maintain records of all maintenance performed on the spray booth.

h. The Permittee shall maintain records of any monitoring conducted in accordance with the requirements of Condition IV(i) to document compliance with Condition II(d).

i. The Permittee shall maintain records of any deviations from the requirements of Conditions II and III of this permit.

If there are any further questions, please call me at (202) 535-1747 or John C. Nwoke at (202) 724-7778.

Sincerely,

Stephen S. Ours, P.E.

Chief, Permitting Branch

SSO/JCN