August 22, 2017

Neil A. Brami, President

Wm. P. Gelberg, Inc. T/A Gelberg Signs

6511 Chillum Place, NW

Washington, DC 20012

**Subject: Permit No. 6545-R1 to Operate a Spray Paint Booth**

Dear Mr. Brami:

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 can construct and operate a stationary source in the District of Columbia. The application of Wm. P. Gelberg, Inc. T/A Gelberg Signs (“the Permittee”) to operate an existing custom-built standard spray paint booth for the painting of signs at 6511 Chillum Place NW, Washington, DC 20012, per the submitted application, received on March 20, 2017 is hereby approved subject to the following conditions:

I. General Requirements:

a. The paint spray booth shall be operated in accordance with the air pollution control requirements of 20 DCMR.

b. This permit expires on August 21, 2022 [20 DCMR 200.4]. If continued operation after this date is desired, the Permittee shall submit an application for renewal by May 21, 2022.

c. 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.

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

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

II. Emission Limits:

a. No person shall 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 any combination of articles, machines, units, equipment, or other contrivances at a facility, unless the uncontrolled VOC emissions are reduced by at least ninety percent (90%) overall capture and control efficiency. [20 DCMR 700.2]

b. 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]

c. Visible emissions shall not be emitted into the outdoor atmosphere from the paint spray booth. [20 DCMR 107 and 606]

III. Operational Limits and Standards:

a. No chemical strippers containing methylene chloride (MeCl) shall be used for paint stripping at the facility.

b. Adhesives, sealants, adhesive primers, or sealant primers shall not be used in the equipment unless they meet the following requirements:

1. They are contact adhesives sold or supplied by the manufacturer in containers containing a net volume of one gallon or less;

2. They are plastic cement welding adhesives (any adhesive intended by the manufacturer for use to dissolve the surface of plastic to form a bond between mating surfaces) with volatile organic compound (VOC) content not exceeding 400 g/L for ABS welding, 490 g/L for CPVC welding, 510 g/L for PVC welding, or 510 g/L for other plastic cement welding;

3. They are other adhesives, sealants, adhesive primers, or sealant primers 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 or less; or

4. The adhesive, sealant, adhesive primer, or sealant primer has received written approval from the Department for use in the equipment and complies with the requirements of 20 DCMR 743-749, as applicable.

c. Mobile equipment, as defined in 20 DCMR 799, shall not be coated in this paint booth.

d. The exhaust stack shall have a minimum height of 15 feet and at least 5 feet above the roof level.

e. The coatings applied shall be by one or more of the following methods [20 DCMR 201 and 40 CFR 63.11173(e)(3)]:

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);

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. The following spray-applied methods:

i. High volume low pressure (HVLP) spray guns;

ii. Electrostatic application;

iii. Airless spray; or

iv. Air-assisted airless spray.

f. Cleaning of spray guns shall be performed by one or a combination of the following methods [20 DCMR 201 and 40 CFR 63.11173(e)(4)]:

1. A fully enclosed spray gun cleaning system that is kept closed when not in use;

2. An unatomized discharge of cleaning solvent into a paint waste container that is kept closed when not in use; or

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

g. The paint spray booth shall meet the following specifications and operational requirements:

1. The unit shall be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray; [40 CFR 63.11173(e)(2)(i)]

2. The exhaust filters shall be replaced as specified by manufacturers’ specifications. If such specifications are unavailable or do not indicate a replacement frequency, they shall be replaced at least once every month or whenever a filter deficiency is identified, whichever is more frequent. There shall be at least one carton of replacement filters onsite at all times; and

3. The unit shall be fully enclosed with a full roof and four complete walls and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls. [40 CFR 63.11173(e)(2)(ii)]

h. The Permittee shall comply with the following housekeeping and pollution prevention measures [20 DCMR 201]:

1. Perform all painting operations that utilize a spray gun in the paint spray booth;

2. Store fresh and used coatings, solvent, and cleaning solvents in non-absorbent, non-leaking containers;

3. Close all coating and solvent containers at all times except when filling, emptying, or in active use;

4. Store cloth and paper, or other absorbent applicators, moistened with coatings, solvents, or cleaning solvents in closed, non-absorbent, non-leaking containers;

5. Minimize spills during the handling and transfer of coatings, solvents, and cleaning solvents; and

6. The use of all fresh and used coatings, solvent, and cleaning solvents shall be in accordance with the recommendations of the most current version of their material safety data sheet (MSDS) for the use of the products.

i. The Permittee shall comply with the following training measures:

1. All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. The minimum requirements for such training and certification are described in Condition III(i)(2) of this permit. The spray application of surface coatings is prohibited by persons who are not certified as having completed the described training. The requirements of this paragraph do not apply to the students of an accredited surface coating training program who are under the direct supervision of an instructor who meets the requirements of this paragraph. [40 CFR 63.11173(e)(1)]

2. Within 180 days of their hiring date, the owner or operator must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings are trained in the proper application of surface coatings as required by Condition III(i)(1) of this permit. The training program must include, at a minimum, the following [40 CFR 63.11173(f)]:

A. A list of all current personnel by name and job description who are required to be trained;

B. Hands-on classroom instruction that addresses, at a minimum, initial and refresher training in the following topics:

i. Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.

ii. Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.

iii. Routine spray booth and filter maintenance, including filter selection and installation.

iv. Environmental compliance with the requirements of 40 CFR 63, Subpart HHHHHH.

Owners and operators who can show by documentation or certification that a painter’s work experience and/or training has resulted in training equivalent to the training required in i-iv above are not required to provide this training to these painters.

Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in i-iv above satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.

C. A description of the methods to be used at the completion of the initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training.

3. Training and certification will be valid for a period not to exceed five years after the date the training is complete, and all personnel must receive refresher training that meets the requirements of Condition III(e)(2) and be recertified every five years. [40 CFR 63.11173(g)(3)]

j. At all times, including periods of startup, shutdown, and malfunction, the Permittee 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]

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 methylene chloride (MeCl).

b. The Permittee shall track the quantity and volatile organic compound (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):



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 (h)(6).

f. The Permittee shall monitor the types of spray booth filters purchased, the backup stores of such filters, 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), (h), and (j).

h. The Permittee shall monitor the status of staff training to ensure compliance with Condition III(i).

V. Record Keeping Requirements:

The Permittee shall maintain the following records for not less than five years from the date of each record and shall make such records available to the Department for inspection upon request. [20 DCMR 500.8 and 40 CFR 63.11178]

a. 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.

c. The Permittee shall maintain records of the type(s) of spray guns or other spray applicators used at the facility.

d. The Permittee shall maintain records of the type and capture efficiency of all spray booth filters used at the facility [40 CFR 63.11177(b)].

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

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

g. The Permittee shall maintain records of certifications that each painter has completed the training specified in Condition III(i) with the date the initial training and the most recent refresher training was completed. [40 CFR 63.11177(a)]

h. The Permittee shall maintain copies of any notification and report required under Condition VI of this permit. [40 CFR 63.11177(d)]

i. The Permittee shall maintain records of any deviation from the requirements of this permit. These records must include the date and time period of the deviation and a description of the nature of the deviation and the actions taken to correct the deviation. [40 CFR 63.11177(g)]

j. The Permittee shall keep records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report specified in Condition VI of this permit. [40 CFR 63.11177(h)]

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

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

VI. Notification and Reporting Requirements:

a. *Initial Notification:* The permittee was required to submit an initial notification that the facility is subject to 40 CFR Subpart HHHHHH, “National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources” in accordance with the requirements of 40 CFR 63.11175(a). *Such certification was received by the Department on June 7, 2012.*

b. *Annual Notification of Changes Report:* The Permittee shall submit a report, to the addresses specified in Condition VI(c), in each calendar year in which information previously submitted in either the Initial Notification, the Notification of Compliance, or a previous Annual Notification of Changes Report has changed. Deviations from the requirements of this permit will be considered to be a change. This report must be submitted prior to March 1 of each calendar year when reportable changes occurred during the previous calendar year and must include the following information [40 CFR 63.11176(a)]:

1. The company’s name and the street address (physical location) of the affected source (the facility) and the street address where compliance records are maintained, if different; and

2. The name, title, address, telephone number, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this permit or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance.

c. Reports required under Condition VI(b) shall be submitted to both of the following addresses:

EPA Region III

Director

Air Protection Division

1650 Arch Street

Philadelphia, PA 19103

and

Chief, Compliance and Enforcement Branch

Department of Energy and Environment

Air Quality Division

1200 First St NE, 5th Floor

Washington DC 20002

d. The Permittee shall immediately contact the Air Quality Division’s Compliance and Enforcement Branch upon becoming aware of a sudden equipment failure or emergency or emissions in excess of any emission limit. The general phone number for the Department is (202) 535-2600.

e. In addition to complying with Condition VI(d) and any other reporting requirements mandated by the District of Columbia, the Permittee shall, within thirty (30) calendar days of becoming aware of any occurrence of excess emissions, supply the Department of the Environment in writing with the following information:

* + 1. The name and location of the facility;
    2. The subject source(s) that failed, experienced the emergency, or caused the excess emissions;
    3. The time and date of the first observation of the equipment failure, emergency, or excess emissions;
    4. The cause and estimate/expected duration of the excess emissions (if applicable); and
    5. The proposed corrective actions and schedule to correct the conditions causing the emergency or excess emissions.

If there are any further questions, please call me at (202) 535-1747 or Olivia Achuko at (202) 535-2997.

Sincerely;

Stephen S. Ours, P.E.

Chief, Permitting Branch

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