

GOVERNMENT OF THE DISTRICT OF COLUMBIA

Department of Energy and Environment

TECHNICAL SUPPORT MEMORANDUM

TO: File

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

FROM: Abraham T. Hagos *ATH*
Environmental Engineer

SUBJECT: **Architect of the Capitol
Planning and Project Management Division, Blue Plains Building
Permit #6507-R1 to Operate a Non-Auto Body Paint Spray Booth**

DATE: December 2, 2015

BACKGROUND INFORMATION

A renewal permit application to operate a non-auto body paint spray booth at the Planning and Project Management Division, Blue Plains Building, was received by the Air Quality Division (AQD) on June 12, 2015. The applicant is the Architect of the Capitol. The paint booth is located at the Planning and Project Management Division, Blue Plains Building at 4700 Shepherd Parkway SW.

The permit action is scheduled to be published in the DC Register on December 11, 2015. Public comments for the permit action will be solicited through January 11, 2016.

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

REGULATORY REVIEW

Since the issuance of the original permit on September 11, 2012 AQD has updated the regulatory review to include a review of additional regulations, as follows.

40 CFR Part 60 Subpart EE-Standard of performance for Surface Coating of metal Furniture:
Except for record keeping, this subpart does not apply to the owner or operator of a metal furniture surface coating operation that uses less than 3,842 liters (1,015 gallons) of coating per year for metal furniture coating. Per 20 DCMR 60.310, purchase or inventory records of annual coating usage must be maintained at the source for a period of at least two (2) years. The permit language has been updated to include a requirement to not exceed this usage level as well as to keep appropriate records to ensure compliance with that requirement.

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40 CFR 63 Subparts MMMM, PPPP, QQQQ, RRRR: National Emission Standards for
Hazardous Air Pollutants:

Subparts MMMM, PPPP, QQQQ, and RRRR relate to NESHAP requirements for surface coatings of miscellaneous metal parts and products, plastic parts and products, wood building products, and metal furniture, respectively. None of these subparts are applicable to this paint spray booth as the facility does not use coatings and/or other materials used in painting operations in quantities that meet or exceed the defined minimum limits necessary to trigger applicability of the said subparts.

RECOMMENDATIONS

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

Public comments for the permit action will be solicited from December 11, 2015 through January 11, 2016. AQD will resolve any comments received before issuing the permit, and if no comments are received, I recommend that permit (#6507-R1) be issued in accordance with 20 DCMR 200.2.

SSO:ATH