

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Energy and Environment

CHAPTER 2 TECHNICAL MEMORANDUM

TO: File

FROM: Stephen S. Ours, P.E.¹ 
Chief, Permitting Branch

SUBJECT: **Smart Transportation Inc.**
Permit No. 6962
Permit to Construct and Operate a Paint Spray Booth at 2615 Evarts St NE

DATE: April 25, 2019

BACKGROUND INFORMATION

A permit application to construct and operate a new paint spray booth at Smart Transportation Inc., located at 2615 Evarts St NE, Washington, DC 20018 was received by the Air Quality Division (AQD) of the Department of Energy and Environment (the Department) on September 4, 2014. The paint booth had been installed prior to receipt of the permit application. A draft permit was issued for public comment on December 12, 2014. A public hearing was held on January 12, 2015. This was a joint hearing that also covered another automotive paint spray booth application for another site. Substantial public comment was received about the two sites, as well as general concerns about automotive painting requirements in the District, in general. A final permit was not issued at that time. Subsequently, the District's air quality regulation covering this type of facility was revised, resulting in the "Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations Regulations", located and 20 DCMR 718, and promulgated in final form on December 1, 2016.

A revised permit application was received June 13, 2016 to address the requirements of the revised regulation. The application is for a semi-downdraft Toolmart automotive paint spray booth. Although the equipment was previously installed, the applicant intends to modify the exhaust stack to install a butterfly cap that complies with the requirements of 20 DCMR 718, hence the processing of this application as both a permit to construct and a permit to operate.

AQD has determined that the facility is an existing source under the revised 20 DCMR 718 regulations. Any automobile refinishing facility that starts operation after February 9, 2016 is a new source under this regulation (and its predecessor emergency rulemaking); all others are considered to be existing. This facility started operation as an auto body paint shop in 2014.

AQD has determined that the facility is a new source under 40 CFR 63, Subpart HHHHHH. Per 40 CFR 63.11171(c), the source is a new source because construction was commenced after

¹ A first draft of this document was prepared by Emily Chimiak, Environmental Engineer, but she left AQD service before the document was finalized. Stephen Ours completed the document.

Smart Transportation Inc.

Permit No. 6962 to Construct and Operate a Paint Spray Booth at 2615 Evarts St NE

April 25, 2019

Page 2

September 17, 2007 and the source was not actively engaged in paint stripping or miscellaneous surface coating prior to September 17, 2007.

The permit action will be published in the DC Register on May 3, 2019. Public comments for the permit action will be solicited through June 3, 2019. A public hearing will be held on June 3, 2019 as well.

Smart Transportation Inc. has not requested that any of the materials submitted with this application be held confidential.

TECHNICAL INFORMATION

The equipment at this site includes one semi-downdraft Toolmart spray booth for full body painting, miscellaneous parts painting, vehicle subassemblies painting, touch-up painting, sanding, and priming. Methylene chloride (MeCl) will not be used at this facility for chemical stripping. The company reports using airless spray application techniques. Cleaning methods include disassembly of the spray gun and cleaning in a vat that is kept closed when not in use and unatomized discharge of cleaning solvent into a paint waste container that is kept closed when not in use. The applicant indicated that the emissions exit at 28 feet above ground and 6 feet above the roof, with a flow of exhaust air that is in a vertical orientation and unimpeded. The applicant indicated that they use a carbon filter as a supplemental emission control device beyond the required particulate matter filter.

This facility is a new source under 40 CFR 63 Subpart HHHHHH, which is also applicable. The effective date for this subpart is January 10, 2011. The applicant indicated a facility start-up year of 2014 and current owner start date of 2014.

It is difficult to accurately estimate emissions from an automotive paint spray booth due to the variations of coatings, job sizes, etc. that occur in a typical auto body paint shop. However, in order to determine a reasonable estimate for purposes of this evaluation, AQD referenced EPA's "Technical Support Document for Potential to Emit Guidance memo. Documentation of Emission Calculations" [Tim Smith, USEPA/OAQPS, April 1998]. Using an average VOC content of 3.5 pounds per gallon, this document estimates 4.8 pounds of VOCs could be emitted per average job. This document also estimates that a single paint booth could be used for no more than 25 jobs per week. Based on these estimates, AQD calculated potential emissions from the single paint booth of 3.12 tons per year of VOCs.

REGULATORY REVIEW

20 DCMR Chapter 2, Section 200: General Permit Requirements:

An auto body spray paint booth is a potential air pollution source because most auto body paints, coatings, and solvents contain volatile organic compounds that are emitted upon use. Thus a Chapter 2 permit is required.

Smart Transportation Inc.

Permit No. 6962 to Construct and Operate a Paint Spray Booth at 2615 Evarts St NE

April 25, 2019

Page 3

Note that, due to known painting operation odor issues in the neighborhood, Smart Transportation Inc. has agreed to use carbon filters in line with required particulate matter filters to better control odors from the operation. This requirement has been included in Condition III(e)(3) of the permit pursuant to 20 DCMR 201.

20 DCMR Chapter 6, Section 606: Visible Emissions

The visible emissions limitations of 20 DCMR 606 are applicable to this facility. Proper operation of the equipment would preclude any visible emissions from being emitted into the outdoor atmosphere from the operation of the paint/spray booth and other equipment at the facility. This more stringent requirement (required by 20 DCMR 201) is contained in Condition II(i).

20 DCMR Chapter 7: Volatile Organic Compound (VOC) Emissions Reduction

The requirements of 20 DCMR 700 were not included in the permit as they are not applicable when 20 DCMR 718 is applicable.

The facility is regulated under the newly revised (December 2016) 20 DCMR 718 which is the District's primary regulation for controlling air emissions from automotive painting operations. The requirements of this regulation have been included in the permit.

This memorandum will not cover all the detailed requirements of this regulation as they are extensive and make up the majority of the permit. However, highlights of the regulatory requirements include the following:

- Limits on allowable VOC content in coatings and solvents [Conditions II(b) and (c)];
- Limits on the coating methods and spray guns allowed [Conditions III(a) and (d) and related conditions];
- Emission point (stack) discharge height and exhaust velocity requirements [Condition III(c)] (primarily intended to reduce odor at ground level);
- Paint booth and filter specifications [Condition III(e)]; and
- Housekeeping and training requirements [Condition III(f) and (g)].

For all of these, appropriate monitoring, testing, and record keeping requirements have been included in the permit to ensure that compliance status can be determined.

The requirements of 20 DCMR 718.18, which authorize the Department to require additional emission controls or curtailment of operations if the facility is found to be in violation of regulatory requirements has been incorporated in Condition I(g).

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

Smart Transportation Inc.

Permit No. 6962 to Construct and Operate a Paint Spray Booth at 2615 Evarts St NE

April 25, 2019

Page 4

Condition II(h) of the permit. Many of the other conditions of the permit, especially many of those brought into the permit pursuant to 20 DCMR 718 are intended, at least in part, to reduce detectable odors. Should odors be problematic despite these requirements, Condition I(g), included in the permit pursuant to 20 DCMR 718.18, allows the Department to require the installation of additional control devices as necessary to ensure compliance.

20 DCMR Chapter 14, Section 1409: Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

This regulation adopts 40 CFR 63, Subpart HHHHHH by reference. Please see the discussion of 40 CFR 63, Subpart HHHHHH below in "Other Regulations".

Other Regulations

40 CFR 63, Subpart HHHHHH, "National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources" (also known as the "Auto Body NESHAP") is applicable to the facility. The rule applies to all motor vehicle and mobile equipment surface coating operations that paint with hazardous air pollutants (HAPs), including the collision repair industry. Many of the operational requirements of this regulation are similar to those of 20 DCMR 718. In some cases, 20 DCMR 718 references 40 CFR 63, Subpart HHHHHH.

To address the applicability of this regulation, it is indicated in the application that chemical paint strippers containing methylene chloride are not used at the site. Thus, the requirements for paint stripping are generally not applicable in this case. Condition II(a) of the permit was developed to ensure that no methylene chloride containing strippers are used at the facility.

The paint spray booth must meet the design requirements of 40 CFR 63.11173(e)(2)(ii). These requirements were included in the permit as Condition III(e)(4).

Condition III(e)(1) was written to allow the facility to use only exhaust filters with 98% or higher capture efficiency for paint overspray per 40 CFR 63.11173(e)(2)(i).

Condition III(a) of the permit was written to ensure compliance with the paint application technique specifications in both 20 DCMR 718.11 and 40 CFR 63.11173(e)(3). Similarly, the spray gun requirements of Condition III(d) were written to ensure compliance with 40 CFR 63.11173(e)(4) and 20 DCMR 718.15.

The training requirements of 40 CFR 63.11173(e)(1), (f), and (g)(3) were included in the permit as Condition III(g).

All applicable record keeping requirements were included in Condition V of the permit. It should be noted that all records will be required to be kept for five years, rather than three per 20 DCMR 500.8, due to the more stringent five year requirement in 40 CFR 63.11178, the similar requirement in 20 DCMR 718.23, and the difficulty of having two different document retention policies for different sets of records.

Smart Transportation Inc.

Permit No. 6962 to Construct and Operate a Paint Spray Booth at 2615 Evarts St NE

April 25, 2019

Page 5

The notification and reporting requirements of 40 CFR 63, Subpart HHHHHH are contained in Conditions VI(a) through (c).

RECOMMENDATIONS

The application to construct and operate the paint spray booth facility and the attached operating permit comply with all applicable federal and District air pollution control laws and regulations.

Public comments for the permit action will be solicited from May 3, 2019 through June 3, 2019. A public hearing will also be held on June 3, 2019. AQD will resolve any comments received before taking any final action on the permit application. If no adverse comments are received, I recommend that permit No. 6962 be issued in accordance with 20 DCMR 200.2 promptly upon the completion of the public review period.

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