PARSONS ENGINEERING SCIENCE, INC.

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July 20, 1995

Karen M. Bullard
Office of Air Quality/NSR Program/Coatings Section
Texas Natural Resources Conservation Commission
P.O. Box 13087
Austin, Texas 78711-3087

Re: Permit Application
Permit No. 29466
Cold Solvent Cleaning Facility
Boerne, Bexar County
Account ID No. BG-0841-S

Dear Karen:

This letter supplies the additional information you requested via your June 23, 1995 letter addressed to Colonel Dean C. Schmelling, Post Commander of Camp Stanley Storage Activity. Each item of concern is restated below, and is followed by our response.

1. The freeboard ratios of the cold solvent cleaning vats. This ratio is the freeboard height divided by the degreaser width. Best available control technology requires that this ratio be at least 0.7. Freeboard ratios of the cold cleaning vats are as follows:

Solvent Vat 1 (EPN1) - 0.53
Solvent Vat 2 (EPN2) - 0.78
Solvent Vat 3 (EPN2) - 0.58
Fingerprint Remover Vat (EPN4) - 0.47

As can be seen, three of the vats have freeboard ratios which are less than 0.7. We respectfully request, given the small sizes and hence very low emissions, that BACT as described in our permit application submitted May, 1995 suffice for these units. Each unit is covered when not in use, and is equipped with a covered internal drainage rack. These units are not located in one of the counties identified in TNRCC Regulation V where a 0.7 freeboard ratio is required. In fact, the sole reason for permitting these units is that they do not meet the freeboard requirement for Standard Exemption 107.

2. Further information on the ventilation.

A. Please describe the area surrounding the emission points. In particular, describe or draw the location of any windows, doors, or other air inlets to the process area. This information is needed to determine whether the tanks will have any fugitive emissions associated with them. EPN1, EPN2, EPN3, and EPN4 are located in Building 90, as shown on the plot plan submitted with the permit application. This building is kept locked at all times to prevent theft,

except during times of weapons transfer. There should be very little fugitive emissions associated with the vats, particularly since each is vented when in use, and is covered when not in use.

B. **Please describe the emission point for the solvent recovery unit. Are these emissions vented to the same process area where the other vats are located? Also, how did you determine the area given on Table 1(a) as the emission point for this unit?** The sulfur recovery unit is a fugitive emission point (EPN5). It is a steam distillation unit located in a room adjacent to Building 90-1 (see plot plan). There is no vent associated with this emission point. Fugitive emissions escape through the eaves and door of the building. The eaves are about 6 in. wide; the door dimensions are approximately 3.5 ft x 8 ft. The area given on Table 1(a) is the area of the room.

3. Your application refers to fixed roof storage tanks. Please describe these tanks and any emissions associated with them. There are five fixed roof storage tanks. Emissions associated with these tanks were faxed to you on July 14, 1995. For your convenience, we have summarized additional data regarding the tanks on the attached Tables 7(b).

4. Material safety data sheets for all materials used in the cleaning units. Technical data sheets are also an acceptable method of documenting the materials you propose to use. These data sheets are attached for the Volatile Corrosion Inhibitor, Safety Kleen, and Fingerprint Remover.

I trust that this information will allow you to continue your review of our application. Please call me at (512) 719-6000 if you have any questions or would like additional information.

Sincerely,

Glynis H. Fowler
Senior Air Quality Scientist

xc: Brian Murphy
Susan Roberts