

Barry R. McBee, *Chairman*  
R. B. "Ralph" Marquez, *Commissioner*  
John M. Baker, *Commissioner*  
Dan Pearson, *Executive Director*



## TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

*Protecting Texans by Reducing and Preventing Pollution*

May 2, 1996

Colonel Dean C. Schmelling  
Post Commander  
DEPARTMENT OF THE ARMY,  
CAMP STANLEY  
25800 Ralph Fair Road  
Boerne, Texas 78015-4800

Re: Standard Exemption Registration  
Nos. 32406, and 32407  
Buildings 27, and 200 Paint Booths  
Boerne, Bexar County  
Account ID No. BG-0841-S

Dear Colonel Schmelling:

This is in response to your standard exemption registrations, Forms PI-7, concerning the proposed operation of spray paint booths in Boerne, Bexar County. We understand that you will operate these booths in conjunction with other storage activities at the same site.

After evaluation of the information which you have furnished, we have determined that your proposed operations are exempt from permitting procedures under Standard Exemption No. 75 if constructed and operated as described in your registration requests. This standard exemption was authorized by the Executive Director of the Texas Natural Resource Conservation Commission (TNRCC) pursuant to 30 TAC Section 116.211 (Regulation VI). A copy of the standard exemption in effect at the time of this registration is enclosed. You must operate in accordance with all requirements of the enclosed standard exemption.

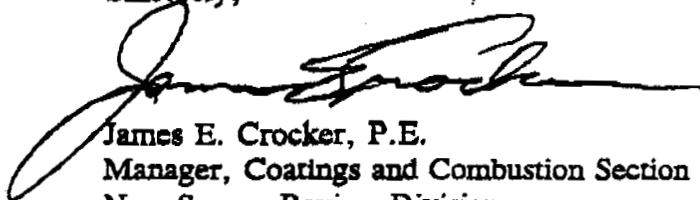
You are reminded that regardless of whether a permit is required, these facilities must be in compliance with all rules and regulations of the TNRCC and of the U.S. Environmental Protection Agency at all times.

Colonel Dean C. Schmelling  
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Re: Permit Nos. 32406, and 32407

Your cooperation in this matter is appreciated. If you have any questions concerning this standard exemption, please contact Ms. Karen M. Bullard in the Office of Air Quality, New Source Review Division at (512) 239-6142.

Sincerely,



James E. Crocker, P.E.  
Manager, Coatings and Combustion Section  
New Source Review Division  
Texas Natural Resource Conservation Commission

JC/KB/sl

Enclosure

cc: Mr. James Menke, Air Program Manager, San Antonio

Record Nos. 42869 and 42870

# TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

## STANDARD EXEMPTION

Under 30 TAC §116.211,  
Control of Air Pollution By Permits For New Construction  
or Modification,

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Standard Exemption No. 75

- (2) Data of daily coatings and solvent use and the actual hours of operation of each coating or stripping operation (source).
  - (i) Data shall be reduced monthly and a report produced monthly that represents hours of operation each day, and emissions from each source in pounds per hour, pounds per day, pounds per week and tons emitted from the site during the previous 12 month period.
  - (ii) The reports shall be completed no later than the 15th day of the following month.
- (3) The records required shall be kept on site with examples of the method of data reduction including units, conversion factors, assumptions, and the basis of the assumptions.
- (4) Records shall be maintained on a rolling 2-year retention period and be made immediately available to the TNRCC or any air pollution control agency with jurisdiction.
- (f) All facilities covered by this exemption at a site shall implement good housekeeping procedures to minimize fugitive emissions including the following:
  - (1) All spills shall be cleaned up immediately.
  - (2) All spray gun and equipment clean up shall be performed with the booth or work area fans operating. As much of the waste solvent shall be collected as possible.
  - (3) All waste coatings, solvents, and spent cleanup solvents shall be stored in sealed containers until removal from the site by an authorized disposal service or until emptying into authorized on-site waste management facilities.
  - (4) There shall be no visible dust emissions from handling, storage, and disposal of particulate matter captured in the spray booth dust collection systems.
- (g) Opacity of emissions from any emission point must not exceed five percent as determined by EPA Method 9 averaged over a six-minute period, except for those periods described in Rule 111.111(a)(1)(E) of 30 TAC Chapter 111.
- (h) Facilities located in ozone nonattainment counties shall meet the requirements of 30 TAC Chapter 115, Subchapter B concerning general vent gas control and Subchapter E concerning surface coating processes.
- (i) Before construction begins, the facility must be registered with the TNRCC Office of Air Quality using Form PI-7.

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Standard Exemption No. 75

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75. Surface coating or stripping facilities, excluding vehicle repair and refinish shops must meet all of the following conditions:

- (a) There shall be no volatile organic compound (VOC) or exempt solvent (non-VOC) control equipment used to meet the limits of this exemption.
- (b) No metal spraying or metalizing (the deposition or spraying of molten metal onto a surface to form a coating) is allowed. This does not exclude the use of metallic coating pigments.
- (c) The total uncontrolled emission of VOC and exempt solvents that are contained in the coating materials as applied and used for cleanup must not exceed the following for all operations:
  - (1) 25 tons per year (tpy) of VOC and 10 tpy of exempt solvents for all surface coating and stripping operations (sources) covered by standard exemption at a site.
  - (2) 30 pounds per hour (lb/hr) of VOC and 5 lb/hr of exempt solvents for all surface coating and stripping operations (sources) covered by standard exemption at a site.
  - (3) 6.0 lb/hr of VOC, averaged over any 4-hour period, and 500 pounds per week on a per source basis.
  - (4) If emissions are less than 0.25 pounds per hour of VOC and/or exempt solvents, a facility is exempt from the requirements of conditions (e), (g), (i), (j), (k) and (l).
- (d) Facilities using non-electric drying or curing ovens that accelerate the release of VOC from the applied coatings (provided that there is no increase in the total emission of VOC from the applied coatings) must meet the following conditions:
  - (1) The maximum heat input to any oven shall not exceed 40 million British thermal units per hour (Btu/hr), and
  - (2) Heat shall be provided by the combustion of sweet natural gas, liquid petroleum gas, fuel gas containing no more than 5.0 grains of total sulfur compounds (calculated as sulfur) per 100 dry standard cubic foot, or No. 2 fuel oil with not more than 0.3 percent sulfur by weight.
- (e) The following records shall be maintained in sufficient detail to demonstrate compliance with this standard exemption:
  - (1) Material Safety Data Sheets for all coating materials and solvents currently in use and those in use for the two previous years shall be kept at the plant site.

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- (4) Coating shall be conducted at least 50 feet from the property line and at least 250 feet from any recreational area, residence, or other structure not occupied or used solely by the owner or operator of the facility or the owner of the property upon which the facility is located.
- (5) Before construction of the facility begins, written site approval shall be received from the appropriate air program regional office of the Texas Natural Resource Conservation Commission (TNRCC) and any local program having jurisdiction in the area.
- (1) Outdoor or nonenclosed surface coating operations that meet all of the following conditions are exempt from the control requirements.
  - (1) Only one outdoor or non-enclosed coating operation may be conducted at any time.
  - (2) VOC and exempt solvent, paint, cleanup solvent and stripper emissions do not exceed 2,000 pounds per year, 240 pounds per week, and 6.0 lb/hr averaged over any 4-hour period.
  - (3) Coating shall be conducted at least 50 feet from the property line and at least 250 feet from any recreational area, residence, or other structure not occupied or used solely by the owner or operator of the facility or the owner of the property upon which the facility is located.
  - (4) Before construction of the facility begins, written site approval shall be received from the appropriate air program regional office of the Texas Natural Resource Conservation Commission (TNRCC) and any local program having jurisdiction in the area.

Effective: May 4, 1994

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- (i) A spray booth or work area is considered enclosed for the purposes of this exemption if the average velocity of ventilating air through the spray booth or work area for electrostatic spray application systems has a minimum velocity of 60 feet per minute (ft/min). All other systems shall have a minimum ventilating air velocity of 100 ft/min. Additionally, all spray booths and work areas shall have a minimum face velocity at the opening of 50 ft/min. The following conditions apply to surface coating operations performed indoors or in an enclosed work area:
- (1) Spraying operations shall be conducted in a spray booth or enclosed work area in which the emissions of particulate matter are controlled by either a water wash system or a dry filter system. For either system, the particulate removal efficiency shall be at least 95 percent as documented by the filter media or water wash system manufacturer, and:
    - (A) The face velocity at the filter media shall not exceed 250 ft/min or that specified by the filter media manufacturer. The pressure drop across the filter as recommended by the filter media manufacturer shall be used.
    - (B) Spray booth emissions shall be exhausted through elevated stacks that extend at least 1.5 times the building height above grade. All stacks shall have vertical discharges and be equipped with rain protection that produces no restrictions or obstructions to vertical flow.
  - (2) Dipping, brushing, rolling, or other non-spraying operations shall be conducted in a booth or enclosed work area such that the emissions shall be exhausted through elevated stacks that extend at least 1.5 times the building height above grade. All stacks shall have vertical discharges and be equipped with rain protection that produces no restrictions or obstructions to vertical flow.
- (k) For surface coating operations that are performed outdoors or in a non-enclosed work area (areas which do not meet the requirements of (j)) the following conditions apply:
- (1) Only one outdoor or non-enclosed source may be in operation at any time.
  - (2) Spray applied coating materials shall not contain any chromates, lead, cadmium, selenium, strontium, or cobalt.
  - (3) Coating materials that contain chromates, lead, cadmium, selenium, strontium, or cobalt may be used with application equipment (such as brushes, rollers, dipping or flow coating) that does not produce particulate emissions.