



Protecting Texas
by Reducing and
Preventing Pollution

FAX T I

DATE: September 15, 2005

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Co./Dept.	<i>Julie Burdick</i>	Co.	
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TO: Name Glare Sanchez
 Organization CSSA
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FROM: TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
 Name Mr. Craig Richardson
 Division/Region Office of Permitting, Remediation, and Registration, Air Permits Division
 Telephone Number (512) 239-1309
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NOTES:

1. Reference: Air Permit No. 28466 renewal application.
2. I have reviewed the reference and have the following comments/questions:
 - A. Para 2.1.1. EPN 2 vat is not included in the discussion.
 - B. All the permitted sources are in one building and the emissions are represented as fugitive. You indicate there are three separate emission points. Please describe exactly how the emissions enter the atmosphere from the building.
 - C. The permit by rule (PBR) sources, which really have nothing to do with this permit renewal, do not require any re-authorization. If there are changes to them or deletions, this information should be recapped and provided separately to our PBR Section.
 - D. Para 2.3. It is not entirely clear from the discussion, but for a facility to be authorized as de minimus under 116.119(a)(4), an application (Form PI-1D) has to be made for us to determine if the facility is de minimus. It would seem so, but there is a formal process for such authorization.
 - E. To incorporate the degreasers into the permit the health effects of their emissions have to be evaluated. The air contaminant is Stoddard Solvent so I modeled its site-wide emissions (EPNs 1 and 4) as fugitives. The maximum off-property ground-level concentration (GLC) is 11,674 µg/m³ versus the acceptable level (ESL) of 3500 µg/m³. (Too bad the building is so close to the property line.) This exceedence must be corrected. Options are 1) capture and exhaust the emissions with velocity through an elevated stack, 2) reduce the hourly emission rate, or 3) leave them under PBR. Regarding the emission rate option, we use AP-42 as last choice. Do you have or can you obtain an actual solvent usage rate, i.e. how much new solvent is added (which equates to the amount emitted) over a specific period of time. This is the preferred method of calculating degreaser emissions. However accomplished, if to be permitted, the GLC must be lowered. If left as PBR I provide the following: in 2.1.4 you say the degreasers do not need to be permitted (registered?) because hourly and annual emission rates are less than allowables. I do not know what this means, but I believe they do not need to be registered (Form PI-7 submitted) because they would be classified as remote reservoir units since it appears the solvent is dispensed through a faucet and then drains into a reservoir.

3. Please respond within 30 days.