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Pam Reed, *Commissioner*  
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Dan Pearson, *Executive Director*



## TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

*Protecting Texas by Reducing and Preventing Pollution*

September 1, 1995

Colonel Dean C. Schmelling  
Post Commander  
DEPARTMENT OF THE ARMY  
CAMP STANLEY  
25800 Ralph Fair Road  
Boerne, Texas 78006

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

Dear Colonel Schmelling:

I expect to recommend issuance of the referenced permit in the near future. When issued, the permit will contain conditions and a maximum allowable emission rates table. A draft copy of the proposed conditions and maximum allowable emission rates table is enclosed for your review. This letter will also acknowledge that your application for the above-referenced permit was technically complete as of August 22, 1995.

If you have comments or questions concerning these conditions, please let me know as soon as practicable to avoid delay. If I do not receive comments from you within 30 days from the date of this letter, this permit application will be administratively voided. Following an administrative voidance, your application and supporting data, as well as any fees submitted, will be retained for 180 days.

To reactivate the voided application, please submit a new PI-1 application form and your comments concerning proposed special conditions. Additional fees need not be submitted if the project scope has not increased and the original fee was correct. If your comments are not received within 180 days from the date of the voidance, your application will automatically be denied, and the entire application, including the appropriate fee, must be resubmitted if you desire to pursue the project.

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Also, when the permit is issued, Condition No. 2 of the permit will state: "This permit is automatically void upon the occurrence of any of the following: (a) Failure to begin construction within 18 months of the date of issuance; (b) Discontinuance of construction for a period of 18 consecutive months or more; (c) Failure to complete construction within a reasonable time." In order for the permit to be extended beyond 18 months, a letter requesting such extension must be received by this agency prior to the automatic void date of the permit.

Thank you for your cooperation. If you have any questions, please call me at (512) 239-6142.

Sincerely,

*Karen M. Bullard*

Karen M. Bullard  
Coatings and Combustion Section  
New Source Review Division (MC-162)  
Texas Natural Resource Conservation Commission

KB/lp

Enclosures

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

## SPECIAL CONDITIONS

Permit No. 29466

### GENERAL

1. This permit authorizes the construction and operation of a Weapons Cleaning Room at Building 90 in Boerne, Bexar County. Sources covered by this permit include Solvent Vat Nos. 1 through 4, the Volatile Corrosion Inhibitor (VCI) Vat, the Fingerprint Remover (FR) Tank, and the Solvent Recovery Unit.

This permit does not cover the other sources of emissions at this site including two paint booths, five storage tanks, two steel shot abrasive cleaners, the gun bluing shop, four standby generators, three boilers, wastewater treatment equipment, and the gun room. These other sources of emissions are covered by Standard Exemption Nos. 75, 86, 102, 41, 5, 7, and 61, respectively. The gun room is a grandfathered source.

2. A copy of this permit shall be kept at Building 90 and made available at the request of personnel from the Texas Natural Resource Conservation Commission (TNRCC) or any air pollution control agency with appropriate jurisdiction.
3. Within 30 days of the date of this permit, all emission points corresponding to the emission point identification numbers on the maximum allowable emission rates table shall be physically identified (by tagging, labeling, engraving, etc.)

### EMISSION LIMITS

4. This permit covers only those sources of emissions listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates," and those sources are limited to the emission limits and other conditions specified in that attached table. Annual rates are based on a consecutive 12-month period.
5. Opacity of emissions from any emission point must not exceed 5 percent averaged over a six-minute period, except for those periods described in TNRCC Rule 111.111(a)(1)(E) of Regulation I. Opacity shall be determined using Environmental Protection Agency Reference Method 9.

### OPERATIONAL LIMITATIONS

6. Solvent Vats Nos. 1 through 4, the VCI, and the FR Tank (hereafter referred to as "the cleaners") shall be equipped as follows:
  - A. Covers shall be provided for the cleaners which shall be kept closed whenever parts are not being handled in the cleaners.

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- B. An internal cleaned parts drainage rack shall be provided for enclosed draining under the cover.
  - C. The solvent spray system shall produce a solid stream and not an atomized or shower spray. The spray system shall operate at a pressure of 10 pounds per square inch gauge or less, as necessary, to prevent splashing above the freeboard.
  - D. The cleaners shall have a freeboard ratio equal to or greater than 0.7.
7. The cleaners shall be operated as follows:
- A. The cleaning solvents to be used in the cleaners shall be limited to the types and amounts listed below.

<u>Solvent</u>	<u>Usage (gallons/year)</u>
Ferro Pak B VCI Solution	155
Mineral Spirits	530
Stoddard Solvent	155

Other brands of VCI solution may be substituted; however, they must contain isopropyl alcohol (IPA) as the only volatile organic compound (VOC). Additionally, emissions of IPA must not exceed the limits represented in the permit application.

- B. A permanent, conspicuous label with the following operating procedures shall be posted on or near the cleaning units. These operating procedures shall be strictly followed.
  - (1) Covers shall be closed at all times except when processing workloads through the cleaning units.
  - (2) Parts shall be allowed to dry within the cleaner freeboard area for at least 15 seconds or until visibly dry.
  - (3) Waste solvents shall not be disposed of or transferred to another party such that the waste solvent will evaporate into the atmosphere. Waste solvent shall be stored only in covered containers
- C. All doors and other openings leading from the weapons cleaning area in Building 90 shall be kept closed at all times except to allow transit of equipment and personnel.

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8. The emission points shall be not be equipped with rain protection that produces restrictions or obstructions to vertical exhaust flow.

RECORDKEEPING

9. A recordkeeping system shall be devised and implemented which demonstrates compliance with the emission limits in Special Condition No. 4. At a minimum, records shall contain the following information:
  - A. Material Safety Data Sheets for materials currently in use and those used during the previous two years. Records are only required for materials with the potential to emit air contaminants.
  - B. Records shall indicate material usages of all raw materials specified in part A of this condition.
  - C. Information from parts A and B of this condition shall be used to generate a monthly report containing the following information:
    - (1) The VOC emissions from all emission point numbers in pounds per hour on a daily basis and tons per year over the previous 12 months. Hourly emission rates may be calculated as daily VOC usage divided by actual hours of operation.
    - (2) Total material usage for the previous 12 months.
10. All records shall be maintained for the most recent 24 months in a central location at Building 90.

HOUSEKEEPING

11. All chemical spills shall be cleaned up promptly using appropriate clean-up procedures.
12. All equipment covered by this permit shall be operated and maintained in accordance with the manufacturer's instructions.
13. Materials that have been used for cleaning shall be stored in sealed containers for proper disposal.

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Permit No. 29466

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these sources.

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY
EPN 1	VCI Vat and Cleaning Vat No. 1	VOC **	1.69	1.02
EPN 2	Cleaning Vat Nos. 2 and 3			
EPN 3	Cleaning Vat No. 4			
EPN 4	Fingerprint Remover Tank			
EPN 5	Solvent Recovery Unit			

- (1) Emission point identification
- (2) Specific point source name
- (3) VOC - volatile organic compounds as defined in General Rule 101.1

\* Emission rates are based on and the facilities are limited by the following maximum operating schedule:

Hrs/day 24 Days/week 7 Weeks/year 52 or Hrs/year

\*\* These emission limits are the total allowed for all EPNs combined.