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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 17, 2003

Mr. Robert Kennedy
Air Program Manager
U.S. Department of the Army, Fort Hood
Attn: AFZF-PW-ENV, Building 4219
77th and Warehouse Avenue
Fort Hood, Texas 76544-5057

Re: Permits by Rule Registration Number: 70014
Surface Coating Facility
Fort Hood, Bell/Coryell County
Regulated Entity Number: RN101612083
Customer Reference Number: CN600126262

Dear Mr. Kennedy:

This is in response to your Form PI-7, entitled "Registration for Permits by Rule" concerning the addition of a surface coating operation located at Building 92060, U.S. Highway 190, Fort Hood, Bell/Coryell County. We understand that the facility is to be used for repainting metal and wood ammunition storage boxes using aerosol paint cans. The coatings operations are to be performed in a semi-enclosed booth which will be located approximately 250 feet from the nearest property line, and approximately 2,600 feet from the nearest receptor. You represent that the maximum emissions of volatile organic compounds from this site will be 0.12 ton per year, 5.00 pounds per week, and 0.60 pound per hour averaged over a five-hour period.

After evaluation of the information which you have furnished, we have determined that your construction is authorized under Title 30 Texas Administrative Code § 106.433 (30 TAC § 106.433) if constructed and operated as described in your registration request. This permit by rule was authorized by the Texas Commission on Environmental Quality (TCEQ) pursuant to 30 TAC Chapter 106.

A copy of the permit by rule in effect at the time of this registration is enclosed. You must construct facilities in accordance with the version of the permit by rule in effect when construction actually begins [see 30 TAC § 106.4(a)(5)]. After completion of the construction, the facility shall be operated in compliance with all the applicable conditions of the claimed permit by rule and 30 TAC § 106.4.

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

Please reference the regulated entity number (RN), customer reference number (CN), and permit number noted in this document in all your future correspondence for the referenced facility or site. The RN replaces the former TCEQ account number for the facility (if portable) or site (if permanent). The CN is a unique number assigned to the company or corporation and applies to all facilities and sites owned or operated by this company or corporation.

Your cooperation in this matter is appreciated. If you have any questions concerning this permit by rule, please contact Mr. Dennis Chanmugam at (512) 239-6618 or write to the Texas Commission on Environmental Quality, Office of Permitting, Remediation, and Registration, Air Permits Division (MC-163), P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,



Anne M. Inman, Manager
General/Standard/Rule (GSR) Permit Section
Air Permits Division
Texas Commission on Environmental Quality

AMI/DRC/alb

Enclosure

cc: Mr. Salal Tahiri, Air Section Manager, Region 9 - Waco

Project Number: 101426

TITLE 30 ENVIRONMENTAL QUALITY
PART 1 TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
CHAPTER 106 PERMITS BY RULE
SUBCHAPTER S SURFACE COATING
RULE §§106.433 Surface Coat Facility

Surface coating or stripping facilities, excluding vehicle repair and refinishing shops, shall meet the following conditions of this section to be permitted by rule.

- (1) This section does not cover metalizing (spraying molten metal onto a surface to form a coating). However, this section does cover the use of coatings which contain metallic pigments.
- (2) All facilities covered by this section at a site shall implement good housekeeping procedures to minimize fugitive emissions, including the following.
 - (A) All spills shall be cleaned up immediately.
 - (B) The booth or work area exhaust fans shall be operating when cleaning spray guns and other equipment.
 - (C) All new and used coatings and solvents shall be stored in closed containers. All waste coatings and solvents shall be removed from the site by an authorized disposal service or disposed of at a permitted on-site waste management facility.
- (3) Drying or curing ovens shall either be electric or meet the following conditions:
 - (A) The maximum heat input to any oven must not exceed 40 million British thermal units per hour (Btu/hr).
 - (B) Heat shall be provided by the combustion of one of the following: 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 Number 2 fuel oil with not more than 0.3% sulfur by weight.
- (4) No add-on control equipment shall be used to meet the emissions limits of this section. The total uncontrolled emissions from the coating materials (as applied) and cleanup solvents shall not exceed the following for all operations:
 - (A) 25 tons per year (tpy) of volatile organic compounds (VOC) and ten tpy of exempt solvents for all surface coating and stripping operations covered by section at a site;
 - (B) 30 pounds per hour (lb/hr) of VOC and 5.0 lb/hr of exempt solvents for all surface coating and stripping operations covered by this section at a site;
 - (C) if emissions are less than 0.25 lb/hr of VOC and/or exempt solvents, a facility is exempt from the remaining requirements of this section, including paragraphs (5) - (9) of this section.
- (5) Opacity of visible emissions shall not exceed 5.0%. Compliance shall be determined by the United States Environmental Protection Agency Method 9 averaged over a six-minute period.
- (6) The following conditions apply to surface coating operations performed indoors, in a booth, or in an enclosed work area:
 - (A) no more than six lb/hr of VOC emissions, averaged over any five-hour period, and 500 pounds per week per booth or enclosed work area;

- (B) minimum face velocity at the intake opening of each booth or work area is 100 feet per minute (ft/min). Emissions shall be exhausted through elevated stacks that extend at least 1.5 times the building height above ground level. All stacks shall discharge vertically; rain protection shall not restrict or obstruct vertical flow;
 - (C) for spraying operations, emissions of particulate matter must be controlled using either a water wash system or a dry filter system with a 95% removal efficiency as documented by the manufacturer. The face velocity at the filter shall not exceed 250 ft/min or that specified by the filter manufacturer, whichever is less. Filters shall be replaced whenever the pressure drop across the filter no longer meets the manufacturer's recommendation.
- (7) For surface coating operations that are performed outdoors or in a non-enclosed work area, or for indoor operations that do not meet the conditions of paragraph (6) of this section, the following conditions apply.
- (A) No more than six lb/hr of VOC emissions, averaged over any five-hour period, and 500 pounds per week shall be emitted at any time for all operations authorized by this paragraph.
 - (B) If coatings applied with spray equipment contain more than 0.1% by weight of chromates, lead, cadmium, selenium, strontium, or cobalt, then total VOC emissions shall be further limited to 240 pounds per week and 2,000 pounds per year. If coatings are applied with non-spray equipment (such as brushes, rollers, dipping or flow coating), the additional restrictions in this paragraph do not apply.
 - (C) Coating operations 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.
 - (D) Before construction of the facility begins, written site approval shall be received from the appropriate regional office of the commission or any local program having jurisdiction.
- (8) The following records shall be maintained at the plant site for the most recent 24 months and be made immediately available to the commission or any pollution control agency with jurisdiction:
- (A) material safety data sheets for all coating materials and solvents;
 - (B) data of daily coatings and solvent use and the actual hours of operation of each coating or stripping operation;
 - (C) a monthly report that represents actual hours of operation each day, and emissions from each operation in the following categories:
 - (i) pounds per hour;
 - (ii) pounds per day;
 - (iii) pounds per week; and
 - (iv) tons emitted from the site during the previous 12 months;
 - (D) examples of the method of data reduction including units, conversion factors, assumptions, and the basis of the assumptions.
- (9) Before construction begins, the facility shall be registered with the commission using Form PI-7.

Source Note: The provisions of this §106.433 adopted to be effective March 14, 1997, 22 TexReg 2439; amended to be effective September 4, 2000, 25 TexReg 8653