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TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

June 3, 1996

Mr. William C. Bodkin
Chief, Environmental Management Branch
U.S. ARMY III CORP & FORT HOOD
ATTN: Environmental Division
Fort Hood, Texas 76544-5057

Re: Standard Exemption Registration No. 30861
Composite Repair Facilities
Fort Hood, Bell/Coryell Counties
Account ID No. BF-0129-I

Dear Mr. Bodkin:

This is in response to your permit application, Form PI-1, concerning the proposed construction and operation of composite repair facilities at the Fort Hood Military Reservation. We understand that the proposed facilities are located approximately 1.5 miles east of Copperas Cove on Highway 190 in Coryell County. Specifically, the facilities are located within the DOL Maintenance Division Composite Repair Facility, Building 88024. Based upon the information submitted in support of your application, we understand that:

- 1 Your facilities utilize non-spraying operations in which annual resin usage is less than 3,000 pounds. As such, part (c)(4) of Standard Exemption 113 is applicable to your facilities until such time as the annual resin usage exceeds 3,000 pounds. Should this occur, one of the following requirements will be satisfied:
 - A. The rest of the applicable conditions within Standard Exemption 113 (effective October 4, 1995) shall be fully complied with;
 - B. The most current version of Standard Exemption 113 in effect at that time will be fully complied with; or
 - C. An application for permit will be filed under the requirements of 30 TAC Chapter 116 in effect at that time.
2. Down draft tables and individual vacuum systems are used to control particulate matter (PM) emissions in the layout area (C09) and the work area/machine shop (C08). The exhaust system uses a HEPA filter that is certified to have a PM_{0.3} removal efficiency of at least 99.97 percent. Utilization of the HEPA filter will satisfy the requirements of Title 40 Code of Federal Regulations Part 61.152 (40 CFR 61.152) pertaining to Subpart M (Asbestos) of the National Emission Standards for Hazardous Air Pollutants (NESHAPS).

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3. Repaired composite panels may be subsequently surface coated within the Paint Facility, Building 88027, which is operated under Texas Natural Resource Conservation Commission (TNRCC) Air Quality Permit No. 24538.

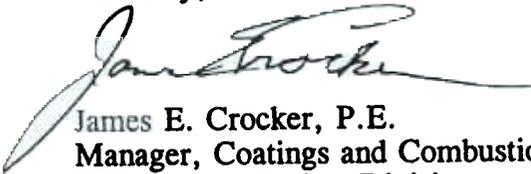
After evaluation of the information which you have furnished, we have determined that your composite repair facilities are exempt from permitting procedures under Standard Exemption 113 if constructed and operated as described in your application. This standard exemption was authorized by the Executive Director of the TNRCC pursuant to 30 TAC Section 116.211 (Regulation VI). A copy of the exemption in effect at the time of this registration is enclosed. You must operate in accordance with all applicable requirements of the enclosed standard exemption.

Due to the fact that your composite repair facilities are being registered under standard exemption, a fee is not required. The four hundred fifty dollar fee submitted in support of your permit application will be returned to you under separate cover.

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 (EPA) at all times. In addition, these facilities shall comply with all requirements of EPA Regulations on National Emission Standards for Hazardous Air Pollutants in 40 CFR 61, Subparts A and M.

Your cooperation in this matter is appreciated. If you have any questions concerning this exemption, please contact Mr. Roberto Coronado of our Office of Air Quality, New Source Review Division at (512) 239-6119.

Sincerely,



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

JC/RC/ds

Enclosure

cc: Ms. Zoe Rascoe, Manager, Air Program, Waco

Record No. 39353

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

STANDARD EXEMPTION LIST

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

Adopted September 6, 1995
Effective October 4, 1995

113. Facilities using thermoset resins (including, but not limited to, polyester resins) to manufacture or repair products, provided that the following conditions are satisfied for (a) and either (b) or (c):

(a) The following requirements shall apply to all thermoset resin facilities:

- (1) Before construction begins, the owner or operator shall file with the Texas Natural Resource Conservation Commission (TNRCC) Office of Air Quality in Austin a completed Form PI-7 and supporting documentation demonstrating that all of the requirements of this exemption will be met. A copy of the registration form and all supporting documents shall be sent to the appropriate Regional Office and any local air pollution program having jurisdiction.
- (2) The owner or operator of this facility shall keep records of resin and acetone usage in pounds on a monthly and calendar year-to-date basis, and shall maintain these records on a calendar year basis with a two-year rolling retention period. This information shall be in sufficient detail to demonstrate compliance with part (b) or (c) as follows, and shall be made available at the request of personnel from the TNRCC or any local air pollution control agency having jurisdiction.
- (3) All resin fabrication and cleaning operations shall be conducted during daylight hours. The exhaust fan(s) must be operating during and for at least 30 minutes after any usage of resin and/or cleaning solvents.

(b) The following requirements shall apply to facilities that have spraying operations (the facilities may include non-spraying operations):

- (1) No more than 75 tons of resin and gelcoat combined and 0.75 tons of acetone shall be used per year (gross usage minus waste disposal).
- (2) All solid trim grinding operations shall be vented through a dry filter system or a water wash system which has a particulate removal efficiency of at least 95%. Particulates trapped in the dry filter system or water wash sludge shall be handled and stored in such manner as to prevent the escape of fugitive dust emissions.
- (3) All resin spraying operations shall be conducted in a booth or an enclosed work area and the emissions shall be exhausted through elevated stack(s). All stacks shall discharge vertically to the atmosphere with no restrictions or obstructions to flow. Each stack shall meet one of the following requirements:

(A) a stack height at least 25 feet above grade and a minimum flow rate of 20,000 actual cubic feet per minute (acfm), or

- (B) a stack height at least 30 feet above grade and a minimum flow rate of 15,000 acfm.
- (4) If annual resin usage is less than 1,000 pounds, then the owner or operator of this facility shall be exempt from all requirements of this exemption except recordkeeping [See 113(a)(2)].
- (c) The following requirements shall apply only to non-spraying operations:
 - (1) No more than 150 tons of resin and gelcoat combined and 1.5 tons of acetone shall be used per year (gross usage minus waste disposal).
 - (2) All solid trim grinding operations shall be vented through a dry filter system or a water wash system which has a particulate removal efficiency of at least 95%. Particulates trapped in the dry filter system or water wash sludge shall be handled and stored in such a manner as to prevent the escape of fugitive dust emissions.
 - (3) All resin operations shall be conducted in a booth or an enclosed work area or the manufacturing building and the emissions shall be exhausted through elevated stack(s). All stacks shall discharge vertically to the atmosphere with no restrictions or obstructions to flow. Each stack shall meet one of the following requirements:
 - (A) a stack height at least 25 feet above grade and a minimum flow rate of 20,000 acfm, or
 - (B) a stack height at least 30 feet above grade and a minimum flow rate of 15,000 acfm.
 - (4) If annual resin usage is less than 3,000 pounds, then the owner or operator of this facility are exempt from all requirements of this exemption except recordkeeping [See 113 (a)(2)].