

Robert J. Huston, *Chairman*  
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Kathleen Hartnett White, *Commissioner*  
Margaret Hoffman, *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

January 13, 2003

Mr. Jerry S. Johnson  
Associate Director for Environmental  
and Site Engineering Programs  
U.S. Department of Energy National  
Nuclear Security Administration  
(Owner and Co-Permittee) and BWXT  
Pantex, L.L.C. (Co-Permittee)  
P.O. Box 30030  
Amarillo, Texas 79120-0030

Re: Standard Exemption Registration Number: 32674  
Pantex Plant - Building 12-104A  
Bay 24 Surface Coating Booth  
Panhandle, Carson County  
Account Number: CF-0019-W

Dear Mr. Johnson:

This is in response to your request to change the date of Issuance of Standard Exemption 75, from August 11, 1989 to June 7, 1996. The claim for this registration, includes the Form PI-7 with both registration and certification signatures, concerning the operational use of one enclosed work-area surface coating booth located in Building 12-104A, Bay 24 which is designed and could be utilized for the surface coating of large items at the Pantex Plant located near the city of Panhandle, in Carson County, Texas.

The routine emissions associated with the operational use of the above-referenced surface coating booth is well within the below-referenced standard exemption applicable at the time of original installation.

After evaluation of the information which you have furnished, we have determined that the operational use of the one enclosed work-area surface coating booth is exempt from permitting procedures under Standard Exemption 75 (dated June 7, 1996) if constructed and operated as described in your registration request. This standard exemption was authorized by the Executive Director of the Texas Commission on Environmental Quality (TCEQ) pursuant to Title 30 Texas Administrative Code § 116.211.

Mr. Jerry S. Johnson  
Page 2  
January 13, 2003

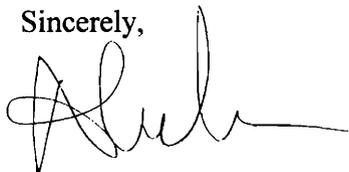
Re: Standard Exemption Registration Number: 32674

A copy of the standard exemption in effect at the time of this registration is enclosed. You must construct, install, or modify this facility in accordance with the version of the standard exemption in effect when construction, installation, or modification actually begins. After completion of construction, installation, or modification, the facility shall be operated in compliance with all applicable conditions of the claimed standard exemption.

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

Your cooperation in this matter is appreciated. If you have any questions concerning this standard exemption authorization, please call Mr. Miguel Galvan at (361) 825-3420 or write to the Texas Commission on Environmental Quality, Office of Permitting, Remediation, and Registration, Air Permits Division (MC-162), P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,



Anne M. Inman, Manager  
Permits by Rule/General Operating Permits Section  
Air Permits Division  
Texas Commission on Environmental Quality

AI/MG/bs

Enclosure

cc: Mr. Richard Lee, Air Program Manager, Region 1 - Amarillo, Texas

Record No. 94740



# Texas Natural Resource Conservation Commission

Rules | Calendar | Publications | Forms | About TNRCC | Help

- [Index](#)
- [Agency](#)
- [Search](#)
- [Home](#)

## Standard Exemptions 73 - 80, June 7, 1996 Standard Exemption List

73. Any rock crusher with a maximum rated capacity of 200 tons per hour or less that operates according to the following conditions:

**See Also:**

Permits By Rule  
(Formerly Exemptions)

Outdated 30 TAC 106  
Exemption Lists

Permits

(a) Operating schedule of the plant does not exceed 1,600 hours per year.

(b) All in-plant haul roads and stockpiles are sprinkled with water and/or chemicals as necessary to achieve maximum control of dust emissions.

(c) Water sprays are located at all belt transfer points, shaker screens, and inlet and outlet of all crushers and used as necessary to achieve maximum control of dust emissions.

(d) The plant is located at least 1/2 mile from any recreational area or residence or other structure not occupied or used solely by the owner of the facility or the owner of the property upon which the facility is located.

(e) The plant is located at least 1,000 feet from any state or federal highway not currently under maintenance or construction.

(f) Before construction of the facility begins, written site approval is received from the executive director and the facility shall be registered with the commission using Form PI-7, including a current Table 17.

74. Any grain handling, storage, and drying facility which meets conditions (a), (b), or (c) below.

(a) The facility is in noncommercial use only - that is, used only to handle, dry, and/or store grain produced by the owner(s) of the facility if the following conditions are satisfied:

1. The total storage capacity does not exceed 750,000 bushels.
2. The grain handling capacity does not exceed 4,000 bushels per hour.
3. The facility is located at least 500 feet from any recreational area or residence or business not occupied or used solely by the owner of the facility.

(b) The facility is in commercial use and the following conditions are satisfied:

1. The total storage capacity of the new and any existing facility or facilities does not exceed 1.5 million bushels.
2. The facility shall be located at least 1/4 mile from any recreational area or 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.
3. Before construction of the facility begins, written site approval shall be received from the executive director and the facility shall be registered with the commission using Form PI-7.

(c) The installation of additional grain storage capacity which satisfies the following conditions:

1. There shall be no increase in hourly grain handling capacity.
2. Existing grain receiving and loadout facilities are utilized.
3. Grain shall be conveyed by closed conveying systems and air suction shall not be pulled on any conveying unit.
4. Written site approval shall be received from the Executive Director of the TNRCC before construction begins for facilities utilizing existing grain receiving facilities when new gravity or auger loadout systems are to be installed.

75. Surface coating or stripping facilities, excluding vehicle repair and refinishing shops, shall meet the following conditions:

(a) This exemption does not cover metalizing (spraying molten metal onto a surface to form a coating). However, this exemption does cover the use of coatings which contain metallic pigments.

(b) 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. The booth or work area exhaust fans shall be operating when cleaning spray guns and other equipment.
3. 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.

(c) Drying or curing ovens shall either be electric or meet the following conditions:

1. The maximum heat input to any oven must not exceed 40 million British thermal units per hour (Btu/hr), and
2. 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.

(d) No add-on control equipment shall be used to meet the emissions limits of this exemption. The total uncontrolled emissions from the coating materials (as applied) and cleanup solvents shall not exceed the following for all operations:

1. 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 standard exemption at a site.
2. 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 standard exemption at a site.
3. 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 exemption, including conditions (e), (f), (g), (h), and (i).

(e) 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.

(f) The following conditions apply to surface coating operations performed indoors, in a booth, or in an enclosed work area:

1. 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.
2. 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.
3. 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.

(g) 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 (f), the following conditions apply:

1. 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.

2. 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.
3. 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.
4. 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.

(h) 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:

1. Material Safety Data Sheets for all coating materials and solvents;
2. data of daily coatings and solvent use and the actual hours of operation of each coating or stripping operation;
3. a monthly report that represents actual hours of operation each day, and emissions from each operation in the following categories:

(A) pounds per hour;

(B) pounds per day;

(C) pounds per week; and

(D) tons emitted from the site during the previous 12 months;

(4) examples of the method of data reduction including units, conversion factors, assumptions, and the basis of the assumptions.

(i) Before construction begins, the facility shall be registered with the commission using Form PI-7.

76. Any new or modified pilot plant, provided the following conditions are met:

(a) For purposes of this exemption, a pilot plant is defined as a facility that is constructed and operated only for one of the following purposes:

(1) testing the manufacturing or marketing potential of a proposed product, or

(2) defining the design of a larger plant, or

(3) studying the behavior of an existing plant through modeling in the pilot plant.

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