

**Texas Commission on Environmental Quality (TCEQ), Air Permits Division**  
**Thermoset Resin Standard Air Permit**  
**November 9, 2006**  
**Houston**

**Minutes**

**I      Opening Remarks ..... **Tara Capobianco/ Becky Southard****

The staff introduced themselves and emphasized that facilities could continue to operate under a permit by rule (PBR) as long as they are operating under its conditions. Ms. Capobianco stated that there were opportunities to comment during the stakeholder meetings and during the formal comment period. Ms. Southard mentioned that the standard permit was expected to be completed sometime in the summer of 2007, and stressed that the standard permit document was a draft that was open to changes based on comments made.

**II     Background or Update Information ..... **Eddie Mack****

Mr. Mack highlighted the distinction between a standard permit and a PBR. Mr. Mack also provided some history as to the styrene tons per year limits and effects screening levels (ESL) given in PBRs and stated that the ESL may be lowered to 70 from 110 in the near future. Mr. Mack stated that the 1998 Environmental Protection Agency (EPA) emission factors were underestimated and that the current PBR would be repealed.

**III    Discussion Topics ..... **Open Discussion****

**A.     *Differences between new standard permit and current PBR***

The new standard permit would not allow fugitive emissions, so more facilities may have to add stacks to meet ESLs and standard permit limits. Everything including tank vents, will need to be sent through stacks.

Stakeholders commented that a PBR enabled a new facility to build as soon as the agency was notified with a PI-7 form. In the case of a standard permit, the permit must be issued before construction begins. The stakeholders were concerned that the draft permit requires approval before construction can commence.

Staff stated that, due to an office reorganization and redistribution of assigned work, a standard permit usually only takes 45 days to issue from the time the agency receives the request. Stakeholders are encouraged to make comments about a suggested timeframe if they believe that it is too slow.

**B.     *When can a facility no longer use a PBR?***

A stakeholder commented that more specifics need to be added to determine what constitutes a change at a facility that would trigger the need for obtaining a standard permit.

**C.     *Public Notice Comments***

A stakeholder commented on the difficulties in obtaining an alternative language public notice.

This comment was outside the scope of the stakeholder meeting since individual standard permit claims are not subject to public notice.

**D. *An ESL of 70 micrograms per cubic meter for styrene is too restrictive***

A stakeholder commented that many facilities would not be able to meet an ESL of 70 and that he was concerned that the ESL would be based on nuisance.

Staff suggested that Mike Honeycut of the TCEQ's Toxicology Section should be contacted to comment on the proposal of styrene's new ESL.

**E. *Would a facility with less than 2000 pounds of usage need to file with the state?***

Staff explained that according to section 1, subsection D of the draft standard permit, sources with less than 2000 pounds or mobile sources are exempt from the standard permit.

**F. *Acetone in the standard permit***

A stakeholder specified that it would make more sense to include acetone use as part of the production process instead of only part of the cleanup process, since it is necessary in the creation of an end product.

Staff noted that the comment would be considered when editing the draft.

The stakeholder also stressed that the acetone limits are too restrictive and questioned the point of restricting acetone. He also commented that alternative acetone substances are not effective.

Staff reminded stakeholders that acetone is considered an air pollutant and requested a specific suggested means of limiting it.

**G. *Solvent limits***

A stakeholder asked why the thermoset resin industry is so limited in their solvent use when the paint spraying PBR allows the use of 25 tons of solvents.

Staff stated that all of the PBR's will be revised for protectiveness, and the paint spraying solvent limit would be evaluated as well.

**H. *Why are the Title V opacity requirements included in the standard permit?***

A stakeholder asked, if Title V is not triggered for facilities emitting less than ten tons of hazardous air pollutants per year, why are Title V requirements

being included in the standard permit?

Staff noted that as PBRs are being revised, they often include new language as a reminder to comply with federal requirements. The Thermoset Resin Standard Permit will not be the only standard permit to include this language.

Stakeholders are also concerned about doing Method 9 observations.

Staff commented that a quarterly observation of a stack is not excessive and a Method 9 observation is not needed as long as no visible emissions are observed. Staff noted that facilities with properly maintained filters should have no visible emissions.

***I. Modeling Comments***

A stakeholder asked if the new standard permit would need modeling.

Standard permits do not require modeling of individual uses of the permit.

A stakeholder asked if the modeling used in creating the tables in the standard permit were screen models.

Screen modeling was not used.

***J. Operating Hours***

A stakeholder asked how the standard permit would address facilities that operated for 24 hours during part of the year.

A case by case permit would need to be obtained.

***K. Resin Disposal***

A stakeholder noted that section 1, subsection C states that liquid resin must be disposed of as soon as possible, but EPA has ruled that the industry could allow the resin to solidify for disposal.

Staff requested more information regarding the EPA ruling.

***L. Filter Changing***

A stakeholder noted that section 5, subsection H, requires that a complete change of filters be stored on site. He suggested changing the language in the permit, since a grinding booth uses an expensive reusable filter that is not changed often.

Staff suggested adding “except those filters that are reusable” to the referenced subsection. Stakeholders agreed to the suggestion, and it will be added for the next draft permit.

**M. Grinding Booth**

A stakeholder asked why the standard permit requires a separate booth for grinding.

Staff noted that section 4, subsection E, which states that grinding can occur in a work area or booth.

**N. What would a facility do if zoning did not allow a stack over 50 feet tall?**

In this instance, a case by case permit would be needed. The standard permit will not cover every scenario.

**O. How are pounds per hour calculated?**

Section 7, subsection D, provides the means by which the limits are calculated. The pounds per hour are calculated on a daily average basis instead of an hourly basis.

**P. How much influence does an organization have in writing standards?**

Staff stated that state employees are directed to talk to the affected community in order to gain input in making the standard permit meaningful. The more involved an interest group is and the more specific the comments made by the group are, the more effect the comments will have on the writing of the specific standards.

**IV Closing Remarks/Action Items ..... Open Discussion**

A stakeholder acknowledged that there were some thermoset resin facilities that were not permitted and should be, but he believes that the industry as a whole tries to stay clean and asked that they not be over-regulated to the point where it is impossible to afford to stay in business.

Staff recommended making comments to the Toxicology Section concerning the applicable ESL and encouraged stakeholders to submit written comments concerning the draft standard permit.

**V Next Meeting Dates**

Other stakeholder meetings will be on:

November 28,2006 in San Antonio, Texas at the Alamo area Council of Governments, 8700 Tesoro Drive, Suite 100, 7:00 PM.

November 30, 2006 in Arlington, Texas at the Arlington City Council Chambers, 101 W Abram Street, 7:00 PM.

**Attendees**

NAME
R. HENDERSON
Bill MUNOZ
Stuart Doss
Cynthia Williams