

Texas Natural Resource Conservation

INTEROFFICE MEMORANDUM

To: Air Permits Division **Date:** July 2, 2002

From: John Steib, Director

Subject: New Source Review Requirements for Surface Coating Facilities

The purpose of this memo is to clarify the Air Permit Division's position on New Source Review requirements for surface coating operations. Surface coating operations, including maintenance painting, must meet one of the following requirements: 1) be considered de minimis; 2) be permitted by rule; or 3) be permitted under Chapter 116.

Title 30 TAC §116.119, De Minimis Facilities or Sources, specifies sources for which registration or authorization prior to construction is not required. Specifically, §116.119(a)(2)(B) states that facilities or sources at a site which, in combination, use no more than 100 gallons per year of coatings are de minimis. A facility is defined in Chapter 116 as a discrete or identifiable structure, device, item, equipment, or enclosure that constitutes or contains a stationary source. Chapter 116 further defines a source as a point of origin of air contaminants. As such, every paint can used at the site is a facility and must be considered in determining whether the maintenance operations are considered de minimis.

Coating operations at a site, including maintenance painting operations, that use more than 100 gallons per year of coatings must be permitted by rule or must obtain a New Source Review permit under Chapter 116. Surface coating operations performed indoors in booths or enclosed areas, as well as outdoor surface coating operations, may be permitted under §106.433, Surface Coating Facility. Section 106.433(4) specifies that the total uncontrolled emissions from all surface coating or stripping operations at the site shall not exceed 25 tons per year of volatile organic compounds (VOC) and 10 tons per year of exempt solvents, or 30 pounds per hour of VOC and 5.0 pounds per hour of exempt solvents. Add-on control equipment may not be used to meet the emission limitations specified in §106.433(4). Section 106 specifies requirements for coatings applied with spray equipment, as well as coatings applied with non-spray equipment, such as brushes, rollers, dipping, or flow coating. If coating operations at a site exceed the emission limitations specified above, a New Source Review permit under Chapter 116 must be obtained. The current best available control technology for surface coating facilities permitted under §116.111 specifies requirements for spray painting, as well as dip coating operations.