From: Randy Ammons
To: [redacted]
Cc: OCE; Randy Ammons
Subject: Re: Woot Carrollton - TCEQ Enforcement Discretion Request
Date: Tuesday, May 19, 2020 4:12:54 PM
Attachments: WOOT_SERVI_Permit152873_ID628695-1_Project314913_Conditions.pdf
image001.png
image002.png
image003.png

Good afternoon Mr. Martin.

This is in response to the request for enforcement discretion that you sent to the Texas Commission on Environmental Quality on May 18, 2020.

The request for enforcement discretion states that due to impacts of COVID-19, Woot Services, LLC (Woot) will not be able to finalize installation and start operation of the Regenerative Thermal Oxidizer by June 1, 2020 per New Source Review Permit No. 152873, Special Condition No. 6. The request was for discretion to be granted through November 12, 2020.

In reviewing this request and working with our Air Permits Division, we understand that Woot requested that Special Condition 6 of NSR Permit No. 152873 be altered to extend the installation and start of operation date of the RTO to November 12, 2020. This request was approved, and Special Condition 6 of the permit was altered to extend the date to November 12, 2020 (copy attached). Since Special Condition 6 of the permit was altered to November 12, 2020, enforcement discretion until November 12, 2020 is not warranted.

The TCEQ is committed to working with you as we respond to the COVID-19 pandemic. If you have any questions, please feel free to contact us at any time.

Regards,

Randy J. Ammons, Director
North Central and West Texas Area
Texas Commission on Environmental Quality

From: Jonathan Q Martin <[redacted]
Sent: Monday, May 18, 2020 2:36 PM
To: OCE <OCE@tceq.texas.gov>; Ramiro Garcia <ramiro.garcia@tceq.texas.gov>
Cc: [redacted] Wilson, Paul <[redacted] Boese, Michael <[redacted] LINDSEY RENFRO <[redacted] Ryan Pickett <[redacted]
Subject: Woot Carrollton - TCEQ Enforcement Discretion Request

Mr. Garcia,

Please find attached the request for enforcement discretion relating to the Woot Services, LLC (Woot) facility located in Carrollton, TX. Please let me know of any questions or comments you may have. Thanks.

Jonathan Martin
Senior Consultant, Manager
T: +512.717.9416 | F: +512.369.3893

bsi. Inspiring trust for a more resilient world.

Consulting Services | 7000 North MoPac Expressway Suite 2091, Austin, TX 78731
www.bsigroup.com| EHS: LinkedIn | Twitter - @BSIEHS l SCS: LinkedIn | Twitter - @BSISCS

Special Conditions

Permit Number 152873

1. This permit authorizes digital printing operation facilities. These facilities are located at 4121 International Parkway, Suite 900, Carrollton, Denton County. This permit covers only those sources of emissions listed on the maximum allowable emission rates table (MAERT) and those sources are limited to the emission limits and other conditions specified in the attached table. The annual rates are based on any consecutive 12-month period.

2. This permit does not include the facilities or maintenance, startup, or shutdown (MSS) activities at the site, except as noted in the MAERT. Instead, these facilities and/or activities are authorized by a permit-by-rule (PBR) under Title 30 Texas Administrative Code (30 TAC) Chapter 106, standard exemption, exemption from permitting, or are a de minimis source listed under 30 TAC § 116.119.

3. A copy of this permit shall be kept at the site and made available at the request of personnel from the Texas Commission on Environmental Quality (TCEQ) or any other air pollution control agency with jurisdiction.

4. With the exception of fugitive sources, the holder of this permit shall clearly label all equipment at the property that has the potential of emitting air contaminants. Permitted emission points shall be clearly labeled corresponding to the emission point numbering on the MAERT.

Emissions Limitations

5. Opacity shall not exceed five percent averaged over a six-minute period from each exhaust stack or vent emission point and the determination shall be made as follows:

   A. Observe for visible emissions while each facility is in operation. Observations shall be made at least 15 feet and no more than 0.25 miles from the emission points. Up to three emission points may be read concurrently, provided that all three emission points are within a 70-degree viewing sector or angle in front of the observer such that the sun position is at the observer's back and can be maintained for all three emission points. Contributions from uncombined water shall not be included in determining compliance with this condition.

   B. Observations shall be performed and recorded quarterly. If visible emissions are observed from an emission point, then the opacity shall be determined and documented within 24 hours for that emission point using Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60), Appendix A, Test Method 9.

   C. If the opacity exceeds five percent, corrective action to eliminate the cause of the excessive visible emissions shall be taken promptly. Corrective action shall be documented within one week of the first visible emission observation. After corrective action has been taken, another visible emissions observation shall be performed and recorded to ensure the visible emissions have been eliminated.

Operational Limitations

6. The regenerative thermal oxidizer (RTO, [EPN RTO]) shall be installed no later than November 12, 2020 and shall be in operation at all times during operation of the apparel printers and associated dryers. **(05/20)**

7. During the start-up purging of the dryers, the emissions will be exhausted through their respective dryer exhaust stacks (EPNs DDV1-S through DDV28-S).

8. No less than ninety-five percent of the emissions from the apparel digital printing operations shall be captured and routed to a thermal control device which meets the following requirements:

   A. The thermal control device shall achieve a 99 percent or greater destruction efficiency for organic compounds emissions.

   B. The thermal control device shall be equipped with a monitor (temperature sensor) that continuously measures and records the temperature of the thermal control device combustion chamber or in the duct immediately downstream of the combustion chamber before any substantial heat exchange occurs and shall be accurate to within ± 5°F. The combustion chamber temperature shall be maintained at greater than or equal to 1500°F based on a 3-hour average temperature over four equally spaced measurement points per hour.

   C. Once every quarter an accuracy audit shall be conducted to determine if the temperature sensor is still functioning properly. Accuracy audit methods include comparisons of sensor output to redundant temperature sensors, to calibrated temperature measurement devices, or to temperature simulation devices. The temperature sensor shall be replaced with a new sensor either if the sensor looks damaged and/or broken or the sensor is no longer accurate to within ± 5°F.

   D. Conduct a visual inspection of each sensor every quarter if redundant temperature sensors are not used.

   E. The operating instructions for the thermal control device shall be established and posted such that they are readily available to all of the thermal control device operators.

   F. The thermal control device shall be operated and maintained in conformance with all of the manufacturer specifications and recommendations.

   G. The thermal control device capture system's ductwork shall be operated under negative pressure. An audio, visual, and olfactory (AVO) inspection of the capture system shall be performed monthly to check for leaking components. The capture system shall be maintained free of holes, cracks, and other conditions that would reduce the collection efficiency of the capture system.

   H. An inspection and maintenance log shall be kept for the thermal control device whereby the log shall note the date of each inspection, the name of the inspector, and any repairs and/or maintenance work performed on the thermal control device and its capture system.

   I. Materials containing halogenated organic compounds shall not be used in the surface coating operations and vented to the thermal control device.

9. Planned maintenance on the thermal control device shall only be performed during periods when the facilities being controlled by the thermal control device are not in operation.

10. Fuel for the dryers and the thermal control device is limited to pipeline-quality, sweet natural gas.

11. The ventilation systems for the RTO and the dryer exhaust system shall exhaust through stacks that have no obstructions or restrictions to vertical exhaust flow. The exhaust stacks shall have a height (as measured from ground level to the discharge point) that is equal to or greater than the following:

Emission Point Number (EPN)	Height (feet)
RTO	40
DDV1-S through DDV28-S	34

Material Usage Flexibility

12. In addition to the approved materials, the use of new materials or products that meet all of the following sub-conditions are allowed. Pollutants from categories of air pollutants not currently authorized on the MAERT cannot be authorized using this special condition. This special condition does not authorize the use of any chlorinated or fluorinated compound when emissions are routed to a thermal control device.

    A. All the ingredients of the new material are known; i.e., the weight percentages of the ingredients add to 100 percent or more.

    B. The maximum hourly (short-term) or annual emission rates from new or existing air contaminant ingredients (aka air contaminants) shall not cause any increases in the short-term or annual emission rates as listed on the MAERT.

    C. Emissions from the new material shall only be from the emission points represented in the table provided in paragraph G(2) of this special condition.

    D. Any air contaminant in the new material is exempt from paragraphs E through H of this special condition if the air contaminant is currently authorized under this permit and the proposed emission rate from each EPN is less than or equal to the authorized emission rate from the same EPN.

    E. Any PM air contaminant in the new material is exempt from paragraphs F through H of this special condition if:

        (1) No specific short-term effects screening level (ESL) is included in the most current set of ESLs available through the TCEQ Toxicity Factor Database (must meet NAAQS); or

        (2) The air contaminant is not included in the most current set of ESLs available through the TCEQ Toxicity Factor Database.

    F. Any air contaminant in the new material is exempt from paragraphs G and H of this special condition if:

        (1) It is emitted at a rate and has a short-term ESL and an annual ESL as stated in the following table; or

Emission Rate (lbs/hr)	Short-term ESL ($\mu g/m^3$)	Annual ESL ($\mu g/m^3$)
≤ 0.04	≥ 2 and < 500	≥ 0.2 and < 50
≤ 0.10	≥ 500 and < 3,500	≥ 50 and < 350
≤ 0.40	≥ 3,500	≥ 350

        (2) It is not sprayed and it has at least one of the following physical characteristics:

            (a) A vapor pressure less than 0.01 mm Hg (0.0002 psi) at 68°F;

            (b) A boiling point at atmospheric pressure that is above 400°F (204°C), provided the compound is not heated above room temperature in the process; or

(c) A molecular weight that is above 200 g/g-mol, provided the compound is not heated above room temperature in the process.

G. For all other new air contaminants or increases in existing air contaminants, the following procedure shall be completed to determine if the short-term impacts are acceptable.

(1) Determine the emission rate of each air contaminant including emissions of the same air contaminant (if an existing air contaminant) from the currently authorized materials that may be emitted at the same time from each emission point.

(2) Multiply the emission rate of the air contaminant by the unit impact multiplier for each emission point from the following table to determine the off-property impact Ground Level Concentration $(GLC)_{MAX}$ for each emission point.

EPN	Unit Impacts ($\mu g/m^3$ per lb/hr)
RTO	10.74
FUG-1	34.29[1]

[1] Unit impact multiplier (85.29 $\mu g/m^3$ per lb/hr) with 0.6 fugitive factor and 0.67 low wind speed adjustment factor applied.

(3) Sum the impacts from each emission point/emission point group to determine a total short-term off-property impact (Total GLC_{MAX}) for the new or existing air contaminant.

(4) Compare the total short-term off-property impact to the short-term ESL for the air contaminant as shown below to determine if it is less than or equal to the ESL. If the total off-property impact exceeds the short-term ESL, then a permit amendment is required to authorize the emission rate for the air contaminant.

Total $GLC_{MAX} \leq ESL_{SHORT}$

Where:

Total GLC_{MAX} = The sum of the short-term GLCs from each emission point.

ESL_{SHORT} = The short-term ESL of the new or existing air contaminant from the most current set of ESLs available through the TCEQ Toxicity Factor Database and the date of the database retrieval or as specifically derived by the TCEQ Toxicology Division. The ESL shall be obtained in writing prior to the use of the new or increased air contaminant.

H. For all other new air contaminants or increases in existing air contaminants, the following procedure shall be completed to determine if the annual impacts are acceptable.

(1) Determine the annual emission rate (tpy) of each air contaminant including emissions of the same air contaminant (if an existing air contaminant) from the currently authorized materials that may be emitted at the same time from each emission point.

(2) Convert the annual emission rate to an hourly emission rate using 8760 hours per year and 2000 pounds per ton.

(3) Multiply the hourly emission rate (lb/hr) of the air contaminant determined in paragraph H(2) of this special condition by the unit impact multiplier for each emission point from the table provided in paragraph G(2) of this special condition to determine the off-property impact GLC_{MAX} for each emission point.

(4) Sum the impacts from each emission point to determine a total off-property impact (Total GLC_{MAX}) for the new or existing air contaminant.

(5) Multiply the total off-property impact (Total GLC_{MAX}) determined in paragraph H(4) of this special condition by 0.08 to determine the annual off-property impact (Annual GLC_{MAX}) for the new or existing air contaminant.

(6) Compare the annual off-property impact to the annual ESL for the air contaminant as shown below to determine if it is less than or equal to the ESL. If the annual off-property impact exceeds the annual ESL, then a permit amendment is required to authorize the emission rates for the air contaminant.

$$\text{Annual } GLC_{MAX} \leq ESL_{ANNUAL}$$

Where:

ESL_{ANNUAL} = The annual ESL of the new or existing air contaminant from the most current set of ESLs available through the TCEQ Toxicity Factor Database or as specifically derived by the TCEQ Toxicology Division.

Recordkeeping Requirements

13. General Condition No. 7 regarding information and data to be maintained on file is supplemented as follows and shall be used to demonstrate compliance with the special conditions and the MAERT:

A. Environmental Data Sheet (EDS) or similar documentation (including material safety data sheets) for all inks and solvents used in the printing operations and all solvents used in the cleanup operations. The EDS or similar documentation for materials shall indicate the maximum composition of all constituents.

B. Data shall be recorded as follows:

(1) Daily inks and solvent used;

(2) Daily hours of operation; and

(3) As-applied coating VOC content for each ink and solvent used.

C. The data recorded in paragraph B of this special condition shall be used to produce a monthly summary that reflects:

(1) The VOC emissions in lbs/hr as a daily average;

(2) The VOC emissions in tons per year (tpy) over the previous 12 months; and

(3) Hazardous Air Pollutant (HAP) emissions in tpy over the previous 12 months for each individual HAP and total HAPs.

D. Field records of visible emissions observation and/or opacity measurements. Records of any corrective action taken.

E. Records of the combustion chamber temperature for the thermal control device.

F. Records of the thermal control device temperature sensor accuracy audit and visual inspection (if applicable). Records of temperature sensor replacement.

G. Records of AVO inspections and a maintenance log for the thermal control device capture system.

H. Records of the inspections and maintenance performed on the thermal control device.

I. Records and calculations demonstrating compliance with Material Usage Flexibility condition for the introduction of any new materials.

J. A copy of initial test reports and any records of subsequent testing performed shall be kept for the life of the permit.

14. The records required by the special conditions shall be maintained in hard copy or electronic format and shall be maintained for at least two years. The recordkeeping summary required shall contain examples of the calculations performed (including units, conversion factors, transfer efficiency, and emission factors), any assumptions made in the calculations, and the basis for those assumptions. These records shall be kept on-site and made available for review upon request by representatives of the TCEQ or any air pollution control agency with appropriate jurisdiction.

Pollution Prevention

15. All waste inks and solvents shall be stored in closed containers. In no case shall any container be left uncovered whose contents exceed one inch in depth as measured with the container placed on a level surface.

16. All inks and solvent spills shall be cleaned up immediately using appropriate procedures.

17. Towels, rags, sponges, or other materials used for cleanup operations shall be placed into closed containers immediately after use.

18. Containers that contain waste inks and solvent, equipment cleaning waste and spill cleanup materials may be opened to allow for the addition or removal of material and shall be closed immediately after the transfer operation is complete. All waste materials shall be kept in storage until removed from the plant site in accordance with all applicable waste rules

Initial Determination of Compliance

19. One-time testing and sampling of the thermal control device shall be performed in order to do the following:

A. Verify the capture efficiency of emissions from the printers and dryers;

B. Verify the destruction efficiency of the thermal control device; and

C. Determine the minimum operating temperature needed to meet the minimum required destruction efficiency. The operating temperature shall be based on a 3-hour rolling average.

20. Specific requirements of the testing are as follows:

A. Submit a proposed test plan to accomplish the required testing for approval to the appropriate TCEQ regional office. The proposed test plan must be submitted within 60 days after reaching normal operating conditions of the thermal control device under this permit. The testing should be performed as follows:

(1) The testing shall be performed during maximum operating conditions for the facilities that are controlled by the thermal control device; and

(2) The thermal control device shall operate at a temperature high enough to ensure compliance with the minimum required destruction efficiency.

B. Schedule a pretest meeting with the appropriate TCEQ regional office staff at least 45 days in advance of testing. The purpose of the meeting is to review the test details which include sampling and measuring procedures to be used, the forms required for recording the pertinent data, and the format and content of the test report as outlined in Chapter 14 of the TCEQ Sampling Procedures Manual;

C. Testing shall be completed no later than 90 days after regional approval of the test plan and no later than 180 days after reaching normal operating conditions; and

D. Submit a test report to the appropriate TCEQ regional office and TCEQ Austin Office of Air, Air Permits Division, no later than 60 days after the testing has been completed. The report shall provide documentation including calculations which demonstrate compliance with the required destruction efficiency.

21. Submit an alteration request to the TCEQ within 6 months of the testing to incorporate into the permit the minimum operating temperature needed to meet the minimum required destruction efficiency

Date: May 18, 2020