

# Houston Galveston Area Council

## Presentation Series

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Permits by Rule Relevant to Automotive Recyclers and  
Automotive Salvage Yards

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# Air Permitting Options

- Permit by Rule
- Other Permitting Options
  - Standard Permit
  - Flexible Permit
  - NSR Construction Permit



# Overview of Permit by Rule

- Set of canned Requirements for facilities which meet some general requirements
  - Meet or Do not Meet
- Historically called Standard Exemption.
  - Change from Standard Exemptions to Permit by Rule in?
    - Why name change?



# Where are Permits by Rule rules located?

- Title 30 Texas Administrative Code Chapter 106 (30 TAC 106)
- 30 TAC 106 is available at
  - [http://www.tnrcc.state.tx.us/permitting/airperm/nsr\\_permits/seindex.htm](http://www.tnrcc.state.tx.us/permitting/airperm/nsr_permits/seindex.htm)



# Why consider a Permit by Rule

- Review time frame
- Cost
- Public Hearing
- When site review is not required, facility can commence construction after submitting PI-7 and supporting material to TCEQ
  - However, company still has to demonstrate compliance with the requirements if requested.



# Arguments Against the use of Permit by Rule

- Requirements are non-negotiable
- Not site-specific – One size fits all



# Auto Recycling and Salvage Yard Process Overview

- Automobiles are dismantled for parts
- Parts are cleaned with solvents
- Automobile reconditioning
  - Painting
  - Part replacement
  - Welding
  - Use of hand held equipment



# Concerns from Permit by Rule Perspective

- Refrigerants from Air Conditioning system
- Cleaning solvents
- Coatings





# When is registration not required

## Deminimis

- You would be considered De Minimis and not required to register if
  - Use no more than 50 gallons per year of cleaning and stripping solvents
  - Use no more than 100 gallons per year of coating materials
    - Coatings used for painting are excluded
- Deminimis rules are available at 30 TAC 116.119
  - Website: <http://www.tnrcc.state.tx.us/oprd/rules/pdflib/116b.pdf>
- OTHERWISE



# When is registration required

You are not De minimis and.....

- You would be required to register



# Relevant Permits by Rule

- 30 TAC 106.4 – General Requirements
- 30 TAC 106.436 – Auto body Refinishing
- 30 TAC 106.227 – Welding
  - Only welding equipment > 0.6 tpy of Pb are non-exempt
- 30 TAC 106.265 – Hand held equipment
  - Hand held or manually operated equipment used for buffing, polishing, carving, cutting, drilling, machining, sanding, sawing, surface grinding of auto body parts



# What do you need to Claim a Permit by Rule

- Construction date of facility
- Fee
  - \$100 for small business
  - \$450 for others
- Core data form
  - Information about your company and facility being registered



# What do you need to claim a Permit by Rule Contd

- Form PI-7 and/or Form PI-7-124
  - Scaled map showing facility, facility boundaries, and nearest receptor outside the facility boundaries.
- Process Description
  - Required level of detail – TCEQ can independently validate the emissions sources from your process
  - Emissions Calculations
  - Show MSDS sheets, usage rates of coating materials etc
    - To enable TCEQ independently validate estimated emissions



# What do you need to claim a Permit by Rule Contd

- Demonstrate compliance with Permit by Rule
- TAC 106.4 and ---- etc
  - To demonstrate compliance
    - Checklists
      - The use of checklist is optional
      - Where can we find the TCEQ Checklists?
        - [http://tnrcc.state.tx.us/permitting/airperm/nsr\\_permits/seform.htm](http://tnrcc.state.tx.us/permitting/airperm/nsr_permits/seform.htm)
    - Alternatives to Checklist
      - Show how you meet each requirement of affected PBR your own words



# Permit by Rule 106.4 – General Requirements

- These requirements must be met before you can claim any Permit by Rule
  - NO<sub>x</sub> – 250 tpy
  - CO – 205 tpy
  - VOCs – 25 tpy
  - SO<sub>2</sub> – 25 tpy
  - PM – 25 tpy



# Permit by Rule 106.4 – General Requirements Contd.

- Any other air contaminant – 25 tpy
- Excluded – CO<sub>2</sub>, H<sub>2</sub>O, N, CH<sub>4</sub>, C<sub>2</sub>H<sub>6</sub>, H<sub>2</sub>, and O<sub>2</sub>
- You do not have a condition in an existing permit which forbids you from using a Permit by Rule
- You must also meet all requirements of the local program area where your facility is located
  - Harris County Pollution Control Department
  - City of Houston Bureau of Air Quality Control





# Permit by Rule 106.436 – Auto Body Refinishing Facility

- Existing checklists are designed to aid the applicant establish if they meet the requirement of the Permit by rule
- Who can use this PBR – 106.436
  - Facilities which do auto body repair and refinishing of motorcycles, passenger cars, vans, light trucks, and heavy trucks



# Permit by Rule 106.436 – Auto Body Refinishing Facility

- Usage rate of materials
  - Hourly
  - Weekly
- Good housekeeping
- No visible emissions



# Permit by Rule 106.436 – Auto Body Refinishing Facility Continued

- Size of materials to be coated
  - Greater than 9 square feet
    - Enclosed paint booth with filter
    - Totally enclosed area
      - Have a filter with an air intake area of no more than 100 feet
      - Have a fan with a flow capacity of 1000 cfm or a face velocity of 100 fpm based on manufacturer's information



# Permit by Rule 106.436 – Auto Body Refinishing Facility Continued

- Less than 9 square feet
  - In addition to using an enclosed booth, totally enclosed are, company may also use
  - A dedicated preparation area which meets the following
    - Ventilation system equipped with a filter
    - Exhaust air vented through a stack or re-circulated into the shop after it is passed through a CAS
      - CAS replaced at manufacturer's recommended intervals



# Permit by Rule 106.436 – Auto Body Refinishing Facility Continued

- Filter should remove at least 90% of particulate matter in air before exiting paint booth, preparation area, etc.
- Paint guns should have high transfer efficiency –  
High volume Low pressure spray guns should be used
- Procedures taken to minimize emissions from equipment clean up



# Permit by Rule 106.436 – Auto Body Refinishing Facility Continued

- Heaters
  - Electric heaters preferred
  - Non electric heaters should be fired by clean gas –pipeline quality natural gas, LPG
  - Heater capacity 5MMBtu/her or smaller



# Permit by Rule 106.436 – Auto Body Refinishing Facility Continued

- Stack height
  - Describe in relation to distance and height of nearest building
- Distance to the nearest offsite receptor
  - 50 feet from nearest offsite receptor
- Any obstruction to vertical discharge of air contaminant from stack?
  - Rain caps
  - Goose neck exhaust
  - Any other stack head that would restrict or obstruct the vertical discharge of air contaminant are not allowed



# Permit by Rule 106.436 – Auto Body Refinishing Facility Continued

- Monthly usage rate limits of solvents
  - Cleanup solvents – 50 gallons per month
  - Wipe solvents – 50 gpm
  - Precoat – 50 gpm
  - Pretreatment – 50 gpm





# Permit by Rule 106.436 – Auto Body Refinishing Facility Continued

## Monthly usage rates continued

- Sealers – 50 gpm
- Primers / primer surfacer – 175 gpm
- Top coat – 320 gpm
- Specialty coating – 50 gpm



# Permit by Rule 106.436 – Auto Body Refinishing Facility Continued

- Record keeping requirements
  - MSDS for a 24 hour period
  - Monthly coatings and solvents purchases
  - Monthly coatings and solvent usage
  - All permitting actions with the EPA, Local program area and TCEQ
- Nuisance



# When can you claim a historical permit by Rule

- Have documents to prove a construction date before the effective date of historical Permit by Rule
  - Tax Records
  - Insurance Records
  - Dated Plat diagram
  - Affidavits by persons who have personal knowledge of construction date of facility
  - TCEQ would evaluate other documentation on a case by case basis



# Where can you get historical PBR from?

- [http://home.tnrcc.state.tx.us/permitting/airp/erm/nsr\\_permits/old106list/index106.htm](http://home.tnrcc.state.tx.us/permitting/airp/erm/nsr_permits/old106list/index106.htm)



# Available Resources

- TCEQ Air Permit Division Website
  - PRB rules
    - [http://www.tnrcc.state.tx.us/permitting/airperm/nsr\\_permits/seindex.htm](http://www.tnrcc.state.tx.us/permitting/airperm/nsr_permits/seindex.htm)
  - Forms and checklists
    - [http://www.tnrcc.state.tx.us/permitting/airperm/nsr\\_permits/seform.htm](http://www.tnrcc.state.tx.us/permitting/airperm/nsr_permits/seform.htm)



# Available Resources Continued

- TCEQ GSR Reviewer
  - Phone duty lines is 512/239-1250
- TCEQ Small Business in Houston
  - Mr. Clarence Gray – Tel. 713/161-3582
  - Ms. Cynthia Williams – Tel. 713/767-3549



# Questions?



Thank You.

