

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
Department of Energy and Environment

**TECHNICAL SUPPORT MEMORANDUM**

TO: File

THROUGH: Stephen S. Ours, P.E. *SSO*  
Chief, Permitting Branch

FROM: Olivia Achuko *OA*  
Environmental Engineer

SUBJECT: **Architect of the Capitol  
Permit #5957-R2 to Operate a Non-Auto Body Spray Paint Booth at the U.S.  
Botanic Garden Production Facility**

DATE: February 17, 2016

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**BACKGROUND INFORMATION**

A renewal permit application to operate a non-auto paint spray booth at the U.S. Botanic Garden was received by the Air Quality Division (AQD) on June 11, 2015. The applicant is the Architect of the Capitol. The paint booth is at the U.S. Botanic Garden Production Facility located at 4700 Shepherd Parkway SW, Washington, DC 20032. The equipment includes a DeVilbiss/Proclean cross-draft model.

The architect of the Capital operates a paint booth inside the U.S. Botanical Garden Production Facility. The paint booth operations involve manual application of paints using brushes and spray cans. HVLP guns are available but are seldom used. The majority of the work includes painting wood furniture (90% of the work) but also includes miscellaneous activities such as painting displays and metal items.

The permit action is scheduled to be published in the DC Register on February 26, 2016. Public comments for the permit action will be solicited through March 28, 2016.

The Architect of the Capitol has not requested that any of the materials submitted with this application be held confidential.

**REGULATORY REVIEW**

Since the issuance of the first renewal permit on September 11, 2012 AQD has updated the regulatory review to include a review of additional regulations, as follows:

40 CFR Part 60 Subpart EE-Standard of Performance for Surface Coating of Metal Furniture:  
Except for record keeping, this subpart does not apply to the owner or operator of a metal furniture surface coating operation that uses less than 3,842 liters (1,015 gallons) of coating per

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year for metal furniture coating. Per 20 DCMR 60.310, purchase or inventory records of annual coating usage must be maintained at the source for a period of at least two (2) years. The permit language has been updated to include a requirement to not exceed this usage level as well as to keep appropriate records to ensure compliance with that requirement.

**40 CFR 63, Subpart HHHHHH – National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources:**

This regulation remains non-applicable. AQD confirmed with Mr. James Styers via an email received by Stephen Ours on February 17, 2016, that the facility does not use coatings in spray guns that contain chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd). The facility does not use strippers that contain methylene chloride and the facility is not an auto body refinishing operation.

**40 CFR 63 Subparts MMMM, PPPP, QQQQ, RRRR: National Emission Standards for Hazardous Air Pollutants:**

Subparts MMMM, PPPP, QQQQ, and RRRR relate to NESHAP requirements for surface coatings of miscellaneous metal parts and products, plastic parts and products, wood building products, and metal furniture, respectively. None of these subparts are applicable to this paint spray booth as the facility does not use coatings and/or other materials used in painting operations in quantities that meet or exceed the defined minimum limits necessary to trigger applicability of the said subparts.

**RECOMMENDATIONS**

The proposed project and attached permit comply with all applicable federal and District air pollution control laws and regulations.

Public comments for the permit action will be solicited from February 26, 2016 through March 28, 2016. AQD will address any comments received before issuing the permit. If no comments are received, I recommend that permit No. 5957-R2 be issued in accordance with 20 DCMR 200.2.

OA

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