

COMMONWEALTH OF VIRGINIA
DEPARTMENT OF AIR POLLUTION CONTROL

AIR QUALITY PROGRAM POLICIES AND PROCEDURES

TITLE: PROCEDURES FOR MAINTAINING RECORDS FOR SURFACE COATING OPERATIONS
AND GRAPHIC ARTS PRINTING PROCESSES

NUMBER: AQP-4

EFFECTIVE DATE: July 1, 1991

APPROVED: Wallace N. Davis
Wallace N. Davis
Executive Director

PURPOSE

The purpose of this document is to prescribe the procedures for maintaining records for surface coating operations and graphic arts printing processes.

BACKGROUND

A. The procedures outlined in this appendix are supplemented by the procedures specified in the U.S. Environmental Protection Agency (EPA) guideline document, entitled "Recordkeeping Guidance Document For Surface Coating Operations And The Graphic Arts Industry", EPA 340/1-88-003, June 1989. In cases where the definitions, standards and other provisions of the EPA guideline documents differ from this document or the Regulations for the Control and Abatement of Air Pollution (VR 120-01) [hereinafter the regulations], this document and the regulations shall take precedence. Use of test methods and procedures not specified in this document is acceptable if approved by the department within the context of the provisions of subsection C below.

B. In order for the Commonwealth to fulfill its obligations under the federal Clean Air Act, some provisions of state regulations are required to be approved by the U. S. Environmental Protection Agency (EPA) and when approved those provisions become federally enforceable.

C. In cases where state regulations specify that procedures or methods shall be approved by, acceptable to or determined by the board or other similar phrasing or specifically provide for decisions to be made by the board or department, it may be necessary to have such actions (approvals, determinations, exemptions, exclusions, or decisions) reviewed and confirmed as acceptable or approved by EPA in order to make them federally enforceable.

D. It has been determined, in accordance with EPA regulations and policy, that this document is to be submitted to EPA and upon approval become part of the State Implementation Plan. Accordingly, any amendments to this document must be approved through the same administrative process.

GENERAL REFERENCES

- A. Regulations for the Control and Abatement of Air Pollution (VR 120-01), § 120-04-05 G and § 120-05-05 G.
- B. "Recordkeeping Guidance Document for Surface Coating Operations and the Graphic Arts Industry", EPA 340/1-88-003, June 1989

LOCATION OF REFERENCED DOCUMENTS

The documents referenced above and any others that may be referenced throughout this document are available for viewing at the central office of the department and are otherwise available as indicated below:

- A. Regulations for the Control and Abatement of Air Pollution.

The regulations are available for viewing at any regional office of the department and copies are available upon request from the central office of the department. A nominal fee may be required.

- B. EPA documents.

Copies of the documents may be obtained, for a nominal fee, from the National Technical Information Service, 5285 Port Royal Road, Springfield, Virginia 22161; (703) 487-4650.

RECISION

This document supersedes any previously issued documents except for regulations relative to this matter.

CONTACT

Richard Olin, Senior Environmental Engineer, Division of Program Development, 804-786-7564 may be contacted about any questions or decisions regarding this document.

DEFINITIONS

As used in this document, all terms not defined herein shall have the meaning given them in the regulations, unless otherwise required by context.

INSTRUCTIONS

- I. Applicability and designation of affected facility.

These procedures are to be used for maintaining records for existing surface coating operations and graphic arts printing processes subject to the emission standards prescribed under Rules 4-26 through 4-36 of the regulations and any new or modified source subject to any volatile organic compound emission standard for a coating operation or printing process prescribed pursuant to Part VIII of the regulations.

II. Procedures.

A. General.

1. Records shall be maintained in accordance with the EPA document "Recordkeeping Guidance Document for Surface Coating Operations and the Graphic Arts Industry", EPA 340/1-88-003, June 1989, and the procedures in subsection B of this section.

2. All information required by subsection B of this section shall be maintained on site, kept current, and made available to the department upon request.

3. Records may be maintained in any manner or format convenient to the owner provided that they are in a form that can be made available to the department upon request.

B. Recordkeeping requirements.

1. The owner shall maintain the following information at all times:

- a. Coating application system number.
- b. Hours of operation per day and per year.
- c. Method of application.
- d. Number and types of coats applied to the substrate.
- e. Drying method.
- f. Substrate type.

2. The owner shall maintain the following information for each coating at all times:

- a. Supplier name, coating name and identification number.
- b. Coating density (pounds per gallon).
- c. Volatile content of coating as supplied (percent by weight).
- d. Water content of coating as supplied (percent by weight).
- e. Exempt solvent content of coating as supplied (percent by weight).
- f. Solids content of coating as supplied (percent by volume)
- g. Name of diluent added, if any.
- h. Identification number of diluent.

- gallon).
- i. Diluent volatile organic compound density (pounds per gallon).
- by weight).
- j. Volatile organic compound content of diluent (percent by weight).
- k. Exempt solvent content of diluent (percent by weight).
- coating).
- l. Diluent/coating ratio (gallon diluent per gallon coating).

3. The owner shall maintain the following information for each coating application system on a daily basis:

- a. Coating application system number.
- b. Time period of each application run.
- c. Coating identification number.
- d. Amount of coating used.
- e. Diluent and clean up solvent identification numbers.
- f. Amount of diluent used.
- g. Amount of clean up solvents used.
- h. Calculated volatile organic compound emissions.

4. Additional recordkeeping requirements for surface coating operations with add-on control systems.

all times:

- a. The owner shall maintain the following information at number.
- (1) Control device identification number and model number.
- (2) Manufacturer.
- (3) Installation date.
- (4) Coating application systems controlled.
- (5) Whether or not the control device is always in operation when the system it is serving is in operation.
- (6) Type of control device.
- (7) Destruction or removal efficiency.
- (8) Date tested (if not tested, method of determining

destruction efficiency).

(9) Design combustion temperature (degrees Fahrenheit) for thermal incinerators.

(10) Design exhaust gas temperature (degrees Fahrenheit), design temperature rise across catalyst bed (degrees Fahrenheit), and anticipated frequency of catalyst change for catalytic incinerators.

(11) Design inlet temperature of cooling medium (degrees Fahrenheit) and design exhaust gas temperature (degrees Fahrenheit) for a condenser.

(12) Design pressure drop across the adsorber at breakthrough, specific volatile organic compound species analyzed, and its concentration at breakthrough for a carbon adsorber.

(13) Emission test results, including inlet volatile organic compound concentration (parts per million), outlet VOC concentration (parts per million), method of concentration determination, and date of determination.

(14) Type and location of capture system.

(15) Capture efficiency (percent).

(16) Method of determining capture efficiency.

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