

Memo No. PS94-10

TO: Stationary Sources Permitting & Enforcement Sections,
Local Health Air Agencies

FROM: James S. Geier / Ram N. Seetharam

DATE: July 28, 1994

RE: Reg. 7. IX - Surface Coating Operations

Specific emission limitations (pounds per gallon coating, pounds per unit area, etc.) are to be complied with on a daily basis. Averaging is permitted. That is, each individual coating need not be a "compliance" coating, as long as the daily average emission limitation is complied with. **This memo will supercede any permit condition which does not specify that daily averaging is acceptable.**

Examples:

Consider the following data for a typical working day in a shop engaging in surface coating of manufactured metal products and metal parts, requiring that the emission shall not be in excess of 3.5 lb/gallon coating:

| Coating Material | gallons consumed | VOC lb/gal | net gallons coating | total VOC lb | VOC lb/gal coating | Remarks |
|----------------------------|------------------|------------|---------------------|--------------|--------------------|---------------|
| W-R Enamel Coating | 11 | 3.5 | 9 | 38.5 | 4.3 | not compliant |
| Low VOC High Solids Enamel | 14 | 2.8 | 14 | 39.2 | 2.8 | compliant |
| Hardeners | 3 | 3.1 | 3 | 9.3 | 3.1 | compliant |
| Reducers | 5 | 5.7 | 5 | 28.5 | 5.7 | not compliant |
| Activators | 2 | 6.1 | 2 | 12.2 | 6.1 | not compliant |

| | | | | | | |
|-------------------|----|------|----|-------|------|---------------|
| Total for the day | 35 | 3.65 | 33 | 127.7 | 3.87 | not compliant |
|-------------------|----|------|----|-------|------|---------------|

Further, consider the same example with reduced quantity of higher VOC materials and increased quantity of lower VOC materials

| Coating Material | gallons consumed | VOC lb/gal | net gallons coating * | total VOC lb | VOC lb/gal coating | Remarks |
|-----------------------------|------------------|------------|-----------------------|--------------|--------------------|---------------|
| W-R Enamel Coatings | 11 | 3.5 | 9 | 38.5 | 4.3 | not compliant |
| Low VOC High Solids Enamels | 19 | 2.8 | 19 | 53.2 | 2.8 | compliant |
| Hardeners | 2 | 3.1 | 2 | 6.2 | 3.1 | compliant |
| Reducers | 2 | 5.7 | 2 | 11.4 | 5.7 | not compliant |
| Activators | 1 | 6.1 | 1 | 6.1 | 6.1 | not compliant |
| Total for the day | 35 | | 33 | 115.4 | 3.5 | compliant |

* deduct amount of exempt constituents from gallons consumed.

Regulation 7. IX. A. 10. a allows for the determination of compliance on daily basis (not on individual coatings). This also allows sources to request for a revision of SIP for longer times for compliance determination.

If "compliance" coatings are not used, compliance with the emission limits (lb/gal coating) can be achieved by add-on controls (e.g. VOC oxidizers/destructors).

A SIP revision may also allow cross-line averaging.