

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR RESOURCES

In Re:

Quality Spraying and Stenciling Company
150 Park Lane
Providence, RI 02907

In Reference to A.H. File No. 97-04-AP

CONSENT AGREEMENT

This Consent Agreement is entered by and between the Rhode Island Department of Environmental Management (hereinafter the "DEM"), and Quality Spraying and Stenciling Company, 150 Park Lane, Providence, RI 02907 (hereinafter "QSS"), pursuant to the Rhode Island Clean Air Act, Title 23, Chapter 23 of the General Laws of the State of Rhode Island and Providence Plantations, as amended, and the Air Pollution Control Regulations adopted in accordance therewith, and the Department of Environmental Management Act, R.I.G.L. 42-17.1-2 et seq., and constitutes an alternative RACT determination pursuant to Section 19.3.3 of Air Pollution Control Regulation No. 19, entitled "Control of Volatile Organic Compounds from Surface Coating Operations," effective 13 November 1979, last amended 7 March 1996.

QSS is regulated under Air Pollution Control Regulation No. 19. In order to assure that QSS complies and/or continues to comply with the provisions of Air Pollution Control Regulation No. 19, the DEM and QSS hereby agree as follows:

1. That the DEM has jurisdiction over the subject matter of this Consent Agreement and over the parties consenting to this Consent Agreement.
2. That QSS is subject to the provisions of Title 23, Chapter 23 of the Rhode Island General Laws, as amended, and the Air Pollution Control Regulations adopted in accordance therewith.
3. That the provisions of this Consent Agreement shall apply to, and be binding upon QSS, its officers, directors, agents, servants, employees, operators, successors and assignees and persons, firms and corporations acting under, through and for it.
4. That Consent Agreement 95-53-AP will become void upon execution of this Consent Agreement.
5. That QSS is subject to the emissions limitations established in Subsection 19.3.1 of Air Pollution Control Regulation No. 19.
6. That QSS has submitted technical and economic documentation, which demonstrates to the satisfaction of the DEM, that the emissions limitations contained in Subsection 19.3.1 of Air Pollution Regulation No. 19 are not currently achievable for all coatings applied.

7. That QSS currently operates the following surface coating equipment, which emit VOC's:
 - A. Seven (7) manual spray booths;
 - B. One (1) turbodisc automatic coating line (consisting of one (1) electrostatic turbodisc booth), one (1) manual touch-up booth, and one (1) drying oven); and,
 - C. Two (2) spindle automatic coating lines (consisting of two (2) electrostatic turbobell booths and two (2) flash-off/drying ovens).

8. That QSS currently operates and shall continue to operate the following equipment:
 - A. Solvent distillation equipment; and,
 - B. Closed loop spray gun cleaning system.

9. That QSS shall measure and record the following information for each day of operation:
 - (a) The name and quantity of each coating applied;
 - (b) The volatile organic compound (VOC) content (lbs VOC/gallon of coating minus water) of each coating applied as received from the supplier;
 - (c) The name and quantity of each diluent added to each coating;
 - (d) The VOC content (lbs VOC/gallon of diluent minus water) of each diluent

- added to each coating as received from the supplier;
- (e) The total quantity of each coating applied and the as-applied VOC content (lbs VOC/gallon of coating minus water) of the coating;
 - (f) The type of substrate, method of application, and method of drying for each coating applied.
10. That the information required by items 9 (a) through (f), above, shall be maintained, at the QSS facility, through the use of a computer based tracking system. The system shall have the capability to retrieve the information required in items 9 (a) through (f), upon request of the DEM or the United States Environmental Protection Agency.
11. That for manual spray application of coatings, QSS shall comply with the following:
- (a) The VOC content of any coating applied by manual spray shall not exceed 6.7 pounds VOC/gallon of coating minus water, as applied.
 - (b) For each calendar month, the average VOC content of all coatings applied by manual spray shall not exceed 5.6 pounds of VOC per gallon of coating minus water, as applied.
12. That for electrostatic application of coatings, QSS shall comply with the following:
- (a) QSS shall not exceed an average emissions limitation of 6.10 pounds

VOC/gallon of coating minus water, as applied over every consecutive twelve (12) month period.

- (b) QSS shall continue to use the electrostatic spraying equipment for a minimum of 50% of its total production, each calendar month. Total production shall be defined as the total number of pieces coated, excluding plastic parts.
13. That in order to demonstrate compliance with Paragraph 12 herein QSS shall comply with the following:
- (a) On a monthly basis, no later than ten (10) days after the first of each month, calculate the average, as-applied, VOC content of all coatings used at the facility, utilizing the following equation:
- $$\text{Avg. VOC Content} = \frac{\sum(\text{Coating VOC Content, as Applied} \times \text{Gallons of Coating Used per Calendar Month})}{\text{Total Gallons of Coating Used per Calendar Month}}$$
- (b) On a monthly basis, no later than ten (10) days after the first of each month, calculate the average, as-applied, VOC content of all coatings applied at the facility for the previous twelve (12) month period
- (c) Calculation of rolling average will start from 1 September 1996.
14. That in addition to the emission limitations set forth in Paragraphs 11 and 12 above, upon execution of this Consent Agreement by all parties, QSS shall limit the actual emissions of VOC's, from all surface coating operations, subject to Regulation No. 19, to no more than twenty (20) tons during any consecutive

twelve (12) month period.

15. That QSS shall submit written quarterly reports, to the DEM, no later than thirty (30) days after the end of each quarter, until the emissions limitations in Subsection 19.3.1 of Air Pollution Control Regulation No. 19 are achieved. The reports shall summarize the compliance status for that quarter, as well as, progress made toward the implementation of compliant coatings, and shall include the following information; correspondence with suppliers, the names and VOC contents of compliant coatings which have replaced non-compliant coatings within the quarter, laboratory/performance testing results, additional steps which are being taken to implement the use of compliant coatings, and a summary of the monthly records of coating use and average as-applied VOC content.
16. That QSS shall follow the work practice implementation plan, as outlined in Appendix A of this Consent Agreement.
17. That QSS shall notify the DEM, in writing, of any violation of this Consent Agreement within ten days of the violation. Violation of any of the conditions established in this Consent Agreement may result in enforcement action, including monetary penalty, being initiated against QSS.
18. That all records required by this Consent Agreement shall be maintained by QSS at the 150 Park Lane facility for a period of five years, and made available to

representatives of the DEM and the United States Environmental Protection Agency upon request. Failure to maintain or produce the required records is a violation of this Consent Agreement.

19. That QSS shall reevaluate the VOC emissions from the facility and shall submit a RACT proposal, that complies with Subsection 19.3.3 of Air Pollution Control Regulation No. 19, to the DEM within one year of the execution of this Consent Agreement and every three years thereafter, until compliance with the emissions limitations in Subsection 19.3.1 of Air Pollution Control Regulation No. 19 are achieved.
20. That it is hereby agreed and understood by the parties that the implementation of the requirements of this Consent Agreement does not relieve QSS from compliance with any and all requirements of the Rhode Island Clean Air Act and applicable Air Pollution Control Regulations, or with any applicable Air Pollution Control Regulations that become effective and/or amended subsequent to the execution of this Consent Agreement.

Consented to in Substance and in Form:

State of Rhode Island and Providence Plantations

Department of Environmental Management

For the Director:

2/20/97
Date

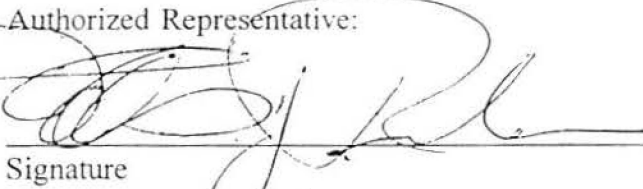


Stephen Majkut, Chief

Office of Air Resources

Quality Spraying and Stenciling Co. hereby agrees to the above Consent Agreement, which becomes effective immediately upon being entered and issued.

10/14/97
Date

Authorized Representative:


Signature

President

Title

Appendix A

Work Practice Implementation Plan

- I. Operator training course. QSS shall train all new and existing personnel, including contract personnel, who are involved in finishing or cleaning operations or implementation of the requirements of this Consent Agreement. All personnel shall be given refresher training annually. QSS shall maintain a copy of the training program with the work practice implementation plan. The training program shall include the following:
 - A. A list of all personnel, by name and job description, that are required to be trained;
 - B. An outline of the subjects to be covered in the initial and refresher training for each person, or group of personnel;
 - C. Lesson plans for courses to be given at the initial and refresher training that include appropriate application techniques, appropriate cleaning procedures, appropriate equipment setup and adjustment to minimize coating usage and overspray, and appropriate management of cleanup wastes;
 - D. A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.

- II. Leak inspection and maintenance plan. QSS shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan, which shall include the following:
 - A. A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings or organic solvents;
 - B. An inspection schedule;
 - C. Methods for documenting the date and results of each inspection and any repairs that were made;
 - D. The time frame between identifying a leak and making the repair, which adheres to the following schedule:
 1. A first attempt at repair shall be made no later than five (5) working days after the leak is detected;
 2. Final repairs shall be made within fifteen (15) days, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three (3) months.

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- III. QSS shall develop an organic solvent accounting form to record:
 - A. The quantity and type of organic solvent used each month for washoff and cleaning;
 - B. The quantity of spent organic solvent generated from each activity, and the quantity that is recycled onsite or disposed offsite each month.

- IV. QSS shall use normally closed containers for storing coatings and cleaning materials.

- V. QSS shall collect all solvent used for line cleaning or spray gun cleaning into normally closed containers.

- VI. QSS shall control emissions from washoff operations by:
 - A. Using normally closed containers for washoff;
 - B. Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.

State of Rhode Island and Providence Plantations
Department of Environmental Management
Office of Air Resources

In Re:

Quality Spraying and Stenciling Company
150 Park Lane
Providence, RI 02907

File No. 97-04-AP

AMENDMENT TO CONSENT AGREEMENT

The Rhode Island Department of Environmental Management (hereinafter the "DEM") and Quality Spraying and Stenciling Company, 150 Park Lane, Providence, RI 02907 (hereinafter "QSS") entered into a Consent Agreement on 21 October 1997 (File #97-04-AP). The parties have agreed that the Consent Agreement may be amended by altering the language in Paragraph 13 in order to clarify record keeping requirements

Paragraph 13 is amended as follows:

13.a. That in order to demonstrate compliance with paragraph 11 herein QSS shall comply with the following:

- i. On a monthly basis, no later than ten (10) days after the first of each month, calculate the average, as-applied, VOC content of all manual spray coatings used at the facility, utilizing the following equation:

$$\text{Average VOC Content} = \frac{\sum (\text{Coating VOC Content, as applied} \times \text{Gallons of Coating Used per Calendar Month})}{\text{Total Gallons of Coating Used per Calendar Month}}$$

- ii. On a monthly basis, no later than ten (10) days after the first of each month, calculate the total number of pieces coated, excluding plastic parts.

b. That in order to demonstrate compliance with paragraph 12 herein QSS shall comply with the following:

- i. On a monthly basis, no later than ten (10) days after the first of each month, calculate the average, as-applied, VOC content of all electrostatic coatings used at the facility, utilizing the following equation:

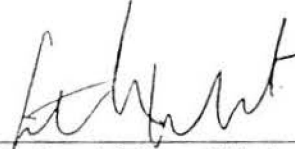
$$\text{Average VOC Content} = \frac{\sum (\text{Coating VOC Content, as applied} \times \text{Gallons of Coating Used per Calendar Month})}{\text{Total Gallons of Coating Used per Calendar Month}}$$

- ii. On a monthly basis, no later than ten (10) days after the first of each month, calculate the average, as-applied, VOC content of all coatings, applied at the facility for the previous twelve (12) month period.
- iii. Calculation of rolling average will start from 1 September 1996.

Consented to in Substance and Form:

State of Rhode Island and Providence Plantations
Department of Environmental Management
For the Director:

13 June 99
Date

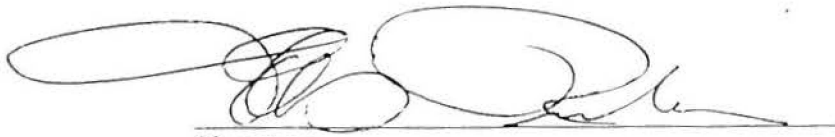


Stephen Majkut, Chief
Office of Air Resources

Quality Spraying and Stenciling Co. hereby agrees to the Amendment to the Consent Agreement, which becomes effective immediately upon being entered and issued.

Quality Spraying and Stenciling Co.
Authorized Representative

6/21/99
Date



Signature
President
Title