The Office of Air Resources offers an opportunity for public comment regarding its proposal to issue an Emissions Cap for the following stationary source:

**Quality Spraying Technologies, Inc., 150 Park Lane, Providence, RI 02907**

Emissions Cap No. 122-2022 for Quality Spraying Technologies, Inc. is being issued to enforce facility-wide limitations on the emissions of Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs). The emissions cap will also reflect the recordkeeping and reporting requirements associated with these emission limitations.

“Operating Permits”, 250-RICR-120-05-29 contains provisions to allow sources to apply for an emissions cap. An emissions cap must be federally enforceable and include some combination of production and/or operational limitations to ensure that emissions are limited by quantifiable and enforceable means. An emissions cap relieves the stationary source from the requirement to obtain an operating permit.

The public comment period for the emissions cap will begin today and continue until 16 January 2023. A virtual public hearing for interested persons will be held if requested by 10 or more persons, or by a governmental subdivision or agency or by an association having not less than 10 members. Any interested person may request that a public hearing be held.

Written comments to be considered part of the record must be submitted during the public comment period. Written comments or requests for a hearing may be sent to the Office of Air Resources at the address below until 4:00 PM, 16 January 2023, at which time the public comment period will close.

The draft emissions cap is available for inspection at the Office of Air Resources, 235 Promenade Street, Providence RI from 8:30am to 4:00pm. Please contact the Office of Customer & Technical Assistance to schedule a file review at (401) 222-4700 Ext. 2777265, or email Brianna Seltzer at Brianna.Seltzer@dem.ri.gov to request the documents electronically. For more information, contact either Aleida Whitney or Brianna Seltzer at (401) 222-2808 (toll free 1-800-752-8088, TTY 711).

Signed this 15 day of December 2022.

Laurie Grandchamp, P.E., Administrator
Office of Air Resources
Pursuant to the provisions of “Operating Permits” 250-RICR-120-05-29, this emissions cap permit is issued to:

MCM Technologies, Inc.
150 Park Lane
Providence, RI 02907

This emissions cap permit shall be effective from the date of its issuance and shall remain in effect until revoked by or surrendered to the Department.

This emissions cap permit does not relieve Quality Spraying Technologies, Inc. from compliance with applicable state and federal air pollution control rules and regulations. The design, construction and operation of this facility shall be subject to the attached operating requirements and conditions.

This emission cap shall be considered an enforceable document as the term is used in “General Definitions Regulation” 250-RICR-120-0(A)(17).

Laurie Grandchamp, P.E., Chief
Office of Air Resources
Date of Issuance: XX/XX/2022
A. Emission Limitations

1. Volatile Organic Compounds (VOC)
   a. The total quantity of Volatile Organic Compounds (VOC) discharged to the atmosphere from the entire facility shall not exceed 3,333 pounds of VOC per calendar month based upon a 12-month rolling average.

2. Hazardous Air Pollutant (HAP)
   a. The total quantity of Hazardous Air Pollutant (HAP) emissions discharged to the atmosphere from the entire facility, shall not exceed 1,500 pounds of any one HAP or 4,000 pounds of any combination of HAPs per calendar month based upon a 12-month rolling average. HAP shall mean an air pollutant which has been listed pursuant to Section 112(b) of the Clean Air Act Amendments of 1990.

3. Listed Toxic Air Contaminants
   a. The total quantity of emissions discharged to the atmosphere from the entire facility, of any listed toxic air contaminant shall not exceed the minimum quantity for that contaminant as specified in 250-RICR-120-05-9.17, Appendix A, based upon a 12-month rolling average. Emissions from activities exempted from the provisions of 250-RICR-120-05-22.5(B) are not included in this limitation.

4. Odors
   a. Any air contaminant or combination of air contaminants discharged to the atmosphere from the facility shall not create an objectionable odor beyond the property line of this facility. Odor evaluations shall be conducted according to the provisions of “Odors”, 250-RICR-120-05-17.

B. Operating Requirements

1. All materials containing VOC shall be stored in containers that are closed at all times except when material is being added or removed.
2. All spray guns must be cleaned in a device that meets the following specifications:
   a. Solvent must be recirculated during the cleaning process so that the solvent is used until it no longer cleans guns satisfactorily.
   b. Spent solvent must be collected so it is available for recycling & disposal.
   c. The device must be vapor tight during cleaning, rinsing and draining operations.

3. The permittee shall implement the following work practices for coating related activities:
   a. Store all new and used VOC-containing coatings, thinners or coating related waste in closed containers,
   b. Ensure that mixing and storage containers used for VOC-containing coatings, thinners and coating-related waste materials are kept closed at all times except when depositing or removing these materials,
   c. Minimize spills of VOC-containing coatings, thinners and coating-related waste materials; and
   d. Convey VOC-containing coatings, thinners and coating related waste materials from one location to another in closed containers or pipes.

4. The permittee shall implement the following work practices for cleaning related activities:
   a. Store all VOC-containing cleaning materials and used shop towels in closed containers,
   b. Ensure that storage containers used for VOC-containing cleaning materials are kept closed at all times except when depositing or removing these materials,
   c. Minimize spills of VOC-containing cleaning materials,
   d. Convey VOC-containing cleaning materials from one location to another in closed containers or pipes, and
   e. Minimize VOC emissions from cleaning of application, storage, mixing and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

C. Compliance Demonstration

1. Compliance Using Compliant Coatings As-Supplied
   a. For each coating that is not formulated on-site by thinning or mixing with another material (“as-supplied”), the VOC and HAP content of the coating shall be determined by documentation furnished by the coating supplier or an outside laboratory that
provides the VOC and HAP content, water content, exempt compounds content, solids content and density of each coating used.

b. VOC and HAP water-exempt compounds and solids content, by weight, of as-supplied coatings shall be determined with USEPA Method 24 or an alternative procedure approved by USEPA and the Office of Air Resources. Sampling procedures shall follow the guidelines presented in “Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24 and Reference Method 24A,” EPA-340/1-91-010. For determining HAP content using Method 24, the owner/operator shall determine the mass fraction of nonaqueous volatile organic matter and use that value as a substitute for mass fraction of organic HAP.

c. If the owner/operator uses a coating that does not release VOC reaction by-products during the cure; for example, if all VOC is solvent; the owner/operator may request permission to use batch formulation information to determine VOC content. If the VOC content of a coating determined by an USEPA Method 24 test is greater than that indicated by the facility's formulation data, the USEPA Method 24 test shall govern.

2. Compliance Using Compliant Coatings Formulated On-site

a. For each coating that is formulated on-site by thinning or mixing with another material, the VOC and HAP content of the coating shall be determined by:

(1) Maintaining batch formulation information documenting the VOC and HAP content of each coating meets the applicable emissions limitation in Condition A.1.a in lb VOC/gallon coating minus water and A.2.a in lb HAP/gallon of coating solids; or,

(2) Using USEPA Method 24 or an alternative procedure approved by USEPA and the Office of Air Resources. Sampling procedures shall follow the guidelines presented in “Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24 and Reference Method 24A,” EPA-340/1-91-010. For determining HAP content using Method 24, the owner/operator shall determine the mass fraction of nonaqueous volatile organic matter and use that value as a substitute for mass fraction of organic HAP.

b. If the VOC and/or HAP content of a coating determined by a USEPA Method 24 test is greater than that indicated by the facility’s formulation data, the USEPA Method 24 test shall govern.

D. Recordkeeping Requirements

1. The permittee shall keep and maintain records sufficient to determine actual VOC and HAP emissions from the entire facility for the previous 12-months. All purchase orders, invoices, including those records listed below and other documents to support the determination of actual VOC and HAP emissions, shall be maintained and be made available to the Office of Air Resources upon request.

2. The permittee shall, on a monthly basis, no later than 15 days after the first of the month, determine the total quantity of VOC discharged to the atmosphere from all operations at the
entire facility. Monthly and 12-month rolling averages shall be calculated. The 12-month rolling average shall be used for comparison with emission limitations. The permittee shall keep records of this determination and provide such records to the Office of Air Resources upon request.

3. The permittee shall, on a monthly basis, no later than 15 days after the first of the month, determine the total quantity of HAP emissions discharged to the atmosphere from all operations at the entire facility. Monthly and 12-month rolling averages shall be calculated. The 12-month rolling average shall be used for comparison with emission limitations. The permittee shall keep records of this determination and provide such records to the Office of Air Resources upon request.

4. The permittee shall maintain records of information sufficient to determine compliance with Conditions A.1.a and A.2.a of this permit, including at minimum the following information for each calendar month for each coating line or operation:

   a. The name, description (coating category) and amount used of each coating, on each coating line or operation,

   b. The type and amount of solvent used for diluents and cleanup operations,

   c. The mass of VOC per volume of each coating minus water and exempt compounds (excluding water), as applied, used each month on each coating line or operation,

   d. The mass of HAP per volume of each coating used, as applied, and

   e. A Safety Data Sheet, a Certified Product Data Sheet or equivalent for each coating, diluent or cleaning solvent used.

5. All records required in this emission cap shall be maintained for a minimum of five years after the date of each record and shall be made available to the Office of Air Resources or its representative upon request.

E. Reporting Requirements

1. The permittee shall notify the Office of Air Resources in writing, within 15 days of determining that the total quantity of VOCs discharged to the atmosphere from all operations at this facility exceeds 3,333 pounds per calendar month (12-month rolling average).

2. The owner/operator shall notify the Office of Air Resources in writing, within 15 days, whenever the total quantity of HAP emissions discharged to the atmosphere from the entire facility exceeds 1,500 pounds of any one HAP or 4,000 pounds of any combination of HAPs per calendar month, (12-month rolling average).

3. The permittee shall register annually with the Office of Air Resources. This requirement may be fulfilled by submission of the annual air pollution inventory required in “Recordkeeping and Reporting” 250-RICR-120-05-14, by April 15th of each year, the following information shall be submitted:
a. The name and address of the company and name and telephone number of a responsible
corporate official submitting the registration,

b. A description of all operations in the facility where VOC’s and HAPs are emitted,

c. Quantities of coatings, solvents, dissolvers, viscosity reducers, diluents, thinners,
reagents, cleaning agents, enamels, lacquers or paints consumed during the previous
calendar year, and

d. The amount of volatile organic compound per gallon of coating solution (pounds per
gallon) for each coating, enamel, lacquer, or paint consumed at the facility during the
calendar year of record.

4. The permittee shall notify the Office of Air Resources in writing of any planned physical or
operational change to any equipment that would:

a. Change the representation of the facility in the emissions cap application.

b. Alter the applicability of any state or federal air pollution rules or regulations.

c. Result in the violation of any terms or conditions of the emissions cap.

d. Qualify as a modification under 250-RICR-120-05-9.

Such notification shall include:

- Information describing the nature of the change.
- Information describing the effect of the change in the emission of any air contaminant.
- The scheduled completion date of the planned change.

Any such change shall be consistent with the appropriate regulations and have the prior approval
of the Office of Air Resources.

5. The permittee shall notify the Office of Air Resources of any anticipated noncompliance with the
terms of this emission cap or any other applicable air pollution control rules and regulations.

F. Other Requirements

1. Employees of the Office of Air Resources and its authorized representatives shall be allowed to
enter the facility at all times for the purpose of inspecting any air pollution source, investigation
any condition it believes may be causing air pollution or examining any records required to be
maintained by the Office of Air Resources.

2. The Office of Air Resources may reopen and revise this emission cap if it determines that:

a. A material mistake was made in establishing the operating restrictions; or

b. Inaccurate emission factors were used in establishing the operating restrictions; or
c. The emissions cap must be revised to ensure that emissions from this facility do not exceed any of the applicability thresholds in 250-RICR-120-05-29.

3. The owner/operator is subject to the requirements of Consent Agreement 97-04-AP and Preconstruction Permit Approval No. XXXX. Compliance with all applicable provisions therein is required.