

Regulation No. 24 Control of Volatile Organic Compound Emissions

Section 4 - Compliance Certification, Recordkeeping, and Reporting Requirements for Coating Sources.

11/29/94

- a. To establish the records required under this Section, the volatile organic compound (VOC) content of each coating, as applied, and the efficiency of each capture system and control device shall be determined by the applicable test methods and procedures specified in **Appendix "B"** and **Appendix "D"** of this regulation.

- b. Requirements for coating sources exempt from emission limitations. Any owner or operator of a coating unit, line, or operation that is exempt from the emission limitations of Section 10 through Section 23 of this regulation because combined VOC emissions from all coating units, lines, and operations at the facility are below the applicability threshold specified in the individual Sections of this regulation, before the application of capture systems and control devices, shall comply with the following for each Section of this regulation from which the owner or operator claims an exemption:
 1. Certification. By November 15, 1993, the owner or operator of a facility referenced in paragraph (b) of this Section shall certify to the Department that the facility is exempt from emission limitations by providing all of the following:
 - i. The name and location of the facility.
 - ii. The address and telephone number of the person responsible for the facility.
 - iii. A declaration that the facility is exempt from the emission limitations of Section 10 through Section 23 of this regulation because combined VOC emissions from all coating units, lines, and operations at the facility that are covered by an individual Section of this regulation are below the appropriate applicability threshold before the application of capture systems and control devices.
 - iv. Calculations of the daily-weighted average that demonstrate that the combined VOC emissions from all coating units, lines, and operations at the facility that are covered by an individual Section of this regulation for a day representative of current maximum production levels are less than 6.8 kilograms (kg) (15 pounds [lb]) before the application of capture systems and control devices. The following equation shall be used to calculate total VOC emissions for that day:

$$T = \sum_{i=1}^n A_i B_i$$

where:

- T = Total VOC emissions from coating units, lines, and operations at the facility before the application of capture systems and control devices in units of kg/day (lb/day).
- n = Number of different coatings applied on each coating unit, each coating line, or each operation at the facility.
- i = Subscript denoting an individual coating.
- A_i = Mass of VOC per volume of coating (i) (excluding water and exempt compounds), as applied, used at the facility in units of kilograms VOC per liter (kg VOC/L) (pounds VOC per gallon [lb VOC/gal]).
- B_i = Volume of coating (i) (excluding water and exempt compounds), as applied, used at the facility in units of liters per day (L/day) (gallons per day [gal/day]). The instrument or method by which the owner or operator accurately measured or calculated the volume of each coating, as applied, used at the facility shall be described in the certification to the Department.

2. Recordkeeping. On and after November 15, 1993, the owner or operator of a facility referenced in paragraph (b) of this Section shall collect and record all of the following information each day and maintain the information at the facility for a period of 5 years:
 - i. The name and identification number of each coating, as applied.
 - ii. The mass of VOC per volume (excluding water and exempt compounds) and the volume of coating (i) (excluding water and exempt compounds), as applied, used each day.
 - iii. The total VOC emissions at the facility, as calculated using the equation under paragraph (b)(1)(iv) of this Section.

3. Reporting. On and after November 15, 1993, the owner or operator of a facility referenced in paragraph (b) of this Section shall notify the Department of any record showing that combined VOC emissions from all coating units, lines, and operations at the coating facility exceed 6.8 kg (15 lb) on any day, before

the application of capture systems and control devices. A copy of such record shall be sent to the Department within 45 calendar days after the exceedance occurs. This reporting requirement is in addition to any other exceedance reporting requirements mandated by the State of Delaware.

c. Requirements for coating sources using complying coatings. Any owner or operator of a coating unit, line, or operation subject to the limitations of Sections 10 through 12 or of Section 13(c)(1) or Section 14 through Section 23 of this regulation and complying by means of the use of complying coatings shall comply with the following:

1. Certification. By November 15, 1993, or upon startup of a new coating unit, line, or operation, or upon changing the method of compliance for an existing subject coating unit, line, or operation from daily-weighted averaging or control devices to the use of complying coatings, the owner or operator of a coating unit, line, or operation referenced in paragraph (c) of this Section shall certify to the Department that the coating unit, line, or operation is or will be in compliance with the requirements of the applicable Section of this regulation on and after November 15, 1993, or on and after the initial startup date. Such certification shall include:
 - i. The name and location of the facility.
 - ii. The address and telephone number of the person responsible for the facility.
 - iii. Identification of subject sources.
 - iv. The name and identification number of each coating, as applied, on each coating unit, line, or operation.
 - v. The mass of VOC per volume (excluding water and exempt compounds) and the volume of each coating (excluding water and exempt compounds), as applied per day.
 - vi. The time at which the facility's "day" begins if a time other than midnight local time is used to define a "day."
2. Recordkeeping. On and after November 15, 1993, or on and after the initial startup date, the owner or operator of a coating unit, line, or operation referenced in paragraph (c) of this Section and complying by the use of complying coatings shall collect and record all of the following information each day for each coating unit, line, or operation and maintain the information at the facility for a period of 5 years:

- i. The name and identification number of each coating, as applied, on each coating unit, line, or operation.
 - ii. The mass of VOC per volume of each coating (excluding water and exempt compounds), as applied, used each day on each coating unit, line, or operation.
 - iii. The volume of each coating applied each day on each coating unit line or operation.
3. Reporting. On and after November 15, 1993, the owner or operator of a subject coating unit, line, or operation referenced in paragraph (c) of this Section shall notify the Department in either of the following instances:
 - i. Any record showing use of any non-complying coatings shall be reported by sending a copy of such record to the Department within 45 calendar days following that use.
 - ii. At least 30 calendar days before changing the method of compliance from the use of complying coatings to daily-weighted averaging or control devices, the owner or operator shall comply with all requirements of paragraph (d)(1) or (e)(1) of this Section, respectively, as well as Regulation No. 2. Upon changing the method of compliance from the use of complying coatings to daily-weighted averaging or control devices, the owner or operator shall comply with all requirements of the Section of this regulation applicable to the coating unit, line, or operation referenced in paragraph (c) of this Section.
- d. Requirements for coating sources using daily-weighted averaging. Any owner or operator of a coating unit, line, or operation subject to the limitations of Sections 10 through 12 or Section 13(c)(1) or Section 14 through Section 23 of this regulation and complying by means of daily-weighted averaging on that unit, line, or operation shall comply with the following:
 1. Certification. By November 15, 1993, or upon startup of a new coating unit, line, or operation, or upon changing the method of compliance for an existing subject coating unit, line, or operation from the use of complying coatings or control devices to daily-weighted averaging, the owner or operator of the subject coating unit, line, or operation shall certify to the Department that the coating unit, line, or operation is or will be in compliance with paragraph (d) of this Section on and after November 15, 1993, or on and after the initial startup date. Such certification shall include:

- i. The name and location of the facility.
- ii. The address and telephone number of the person responsible for the facility.
- iii. Identification of subject sources.
- iv. The name and identification number of each coating unit, line, or operation that will comply by means of daily-weighted averaging.
- v. The instrument or method by which the owner or operator will accurately measure or calculate the volume of each coating (excluding water and exempt compounds), as applied, used each day on each coating unit, line, or operation.
- vi. The method by which the owner or operator will create and maintain records each day as required in paragraph (d)(2) of this Section.
- vii. Calculation of the daily-weighted average, using the procedure in **Appendix "C" (a)** of this regulation, for a day representative of current or projected maximum production levels.
- viii. The time at which the facility's "day" begins if a time other than midnight local time is used to define a "day."

2. Recordkeeping. On and after November 15, 1993, or on and after the initial startup date, the owner or operator of a coating unit, line, or operation referenced in paragraph (d) of this Section and complying by means of daily-weighted averaging shall collect and record all of the following information each day for each coating unit, line, or operation and maintain the information at the facility for a period of 5 years:

- i. The name and identification number of each coating, as applied, on each coating unit, line, or operation.
- ii. The mass of VOC per volume (excluding water and exempt compounds) and the volume of each coating (excluding water and exempt compounds), as applied, used each day on each coating unit, line, or operation.

startup date, the owner or operator of a coating unit, line, or operation referenced in paragraph (e) of this Section shall collect and record all of the following information each day for each coating unit, line, or operation and maintain the information at the facility for a period of 5 years:

- i. The name and identification number of each coating used on each coating unit, line, or operation.
- ii. The mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating used each day on each coating unit, line, or operation.
- iii. The maximum VOC content (mass of VOC per unit volume of coating solids, as applied) or the daily-weighted average VOC content (mass of VOC per unit volume of coating solids, as applied) of the coatings used each day on each coating unit, line, or operation.
- iv. The required overall emission reduction efficiency for each day for each coating unit, line, or operation as determined in Section 10(e)(1)(iii), Section 11(d), Section 12(e)(1)(iii), Section 13(e)(1)(iii), Section 14(e)(1)(iii), Section 15(e)(1)(iii), Section 16(e)(1)(iii), Section 17(e)(1)(iii), Section 18(e)(1)(iii), Section 19(e)(1)(iii), Section 20(e)(1)(iii), Section 21(e)(1)(iii), Section 22(e)(1)(iii), Section 23(e)(1)(iii) of this regulation.
- v. The actual overall emission reduction efficiency achieved for each day for each coating unit, line, or operation as determined in **Appendix "D" (c)** of this regulation.
- vi. Control device monitoring data.
- vii. A log of operating time for the capture system, control device, monitoring equipment, and the associated coating unit, line, or operation.
- viii. A maintenance log for the capture system, control device, and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any

outages.

- ix. For thermal incinerators, all 3-hour periods of operation in which the average combustion temperature was more than 28°C (50°F) below the average combustion temperature during the most recent performance test that demonstrated that the facility was in compliance. The combustion chamber set-point shall be no less than that during the most recent performance test that demonstrated that the facility was in compliance.
 - x. For catalytic incinerators, all 3-hour periods of operation in which the average temperature of the process vent stream immediately before the catalyst bed is more than 28°C (82°F) below the average temperature of the process vent stream immediately before the catalyst bed during the most recent performance test that demonstrated that the facility was in compliance. The set-point for the process vent stream immediately before the catalyst bed shall be no less than that during the most recent performance test that demonstrated that the facility was in compliance.
 - xi. For carbon adsorbers, all 3-hour periods of operation during which either the average VOC concentration or the reading of organics in the exhaust gases is more than 20 percent greater than the average exhaust gas concentration or reading measured by the organics monitoring device during the most recent determination of the recovery efficiency of the carbon adsorber that demonstrated that the facility was in compliance.
3. Reporting. On and after November 15, 1993, the owner or operator of a subject coating unit, line, or operation referenced in paragraph (e) of this Section shall notify the Department in either of the following instances:
- i. Any record showing noncompliance with the applicable requirements for control devices shall be reported by sending a copy of the record to the Department within 45 calendar days following the occurrence.
 - ii. At least 30 calendar days before changing the method of compliance from control devices to the use of complying coatings or daily-weighted averaging, the owner or operator shall comply with all requirements of paragraph (c)(1) or (d)(1) of this Section, respectively, as well as Regulation No. 2.

Upon changing the method of compliance from control devices to the use of complying coatings or daily-weighted averaging, the owner or operator shall comply with all requirements of the Section of this regulation applicable to the coating unit, line, or operation referenced in paragraph (e) of this Section.