

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

VS

A.H. File No. 87-2-AP

PROVIDENCE METALLIZING COMPANY, INC.
51 FAIRLAWN AVENUE
PAWTUCKET, RHODE ISLAND 02860

ADDENDUM TO CONSENT AGREEMENT

In Item 5, change "Providence Metallizing will demonstrate compliance with the above emissions limitation, according to the provisions of Regulation 15.4, such that the VOC emissions rate from all spray booths calculated on an equivalent solids applied basis shall be at or below the following" to read "Providence Metallizing will demonstrate compliance with the above emissions limitations, according to the provisions of Regulation 15.4, such that the average VOC emissions rate for each process calculated on a equivalent solids applied basis shall be at or below the following".

In Item 5.1, change the last sentence to read "This emission baseline may not be exceeded unless the VOC emissions exceeding the emission baseline result from the use of coatings which meet the emission limits either by formulation or by incineration beyond what is necessary to comply with the bubble." JUL 21 1989

In Item 6, add the sentence "No spray booth may operate in exceedance of the emission limits until emission reduction credits have been quantified". Change "All air pollution control equipment is subject to the permit requirements of Rhode Island Air Pollution Control Regulations. Providence Metallizing will conduct stack

5.1 Providence Metallizing shall limit annual emissions under the bubble to 126774 lbs VOC, to be complied with on a 12 month rolling basis. This emission baseline may not be exceeded unless the VOC emissions exceeding the emission baseline result from the use of coatings which meet the emission limits either by formulation or by incineration.

In Item 6, change "The stack test shall be conducted, and emission reduction credits be quantified by 14 October 1987. No spray booth may operate at greater than 3.5 lbs VOC/gallon coating after 14 October 1987 until the emission reduction credits of the control equipment are quantified." to read "The stack test shall be conducted by 1 March 1989. Emission reduction credits shall be quantified by 1 April 1989."

6.1 That DEM and EPA personnel may monitor the emission reduction credits generated by the oxidizer, records will be kept, on a continuous basis, of the oxidizer combustion temperature. An alarm will be installed which will sound should the air flow through the oxidizer exceed the rate set in the final operating permit. Dates and times of exceedances will be kept in a logbook for examination during Division inspections.

In Item 8, change "Records kept will enable Division and/or EPA personnel to determine compliance with the Item 5 emissions limit of 3.5 lb. VOC/gallon of coating (minus water) on a facility wide basis. This logbook will be available for inspection by Division personnel at Providence Metallizing Co. premises only, and be kept for a minimum of three years." to read "Daily records will include, for each coating, the coating identification number, the VOC content of each coating as applied, and the amount of each coating used, and whether the coating was used on a controlled or an uncontrolled line. An emission limit will be assigned to each coating based on the coating function (that is, whether the coating is used as a base or top coat, or in a metallizing process). Daily reports will be compiled on a calendar month and submitted to the Division by the 10th day of the following month. Records will enable Division and/or EPA personnel to determine compliance with the Item 5 emissions limits and will be kept for a minimum of three years. Records shall be kept in a manner which shows which emissions are generated under the bubble and are subject to the emission baseline, and which emissions meet the emission limits and are exempt from the emission baseline."

In Item 9, change "If an existing coating for a specific product category is replaced and said coating had a VOC content over 3.5 lb. VOC/gallon of coating (minus water)" to read "If an existing coating for a specific product category is replaced and said coating had a VOC content over the emissions limitation listed for the applicable process in Section 5."

Item 14 shall be removed from the consent agreement.