

Miller, Randall B (Randy)

From: Miller, Randall B (Randy)
Sent: Thursday, February 12, 2004 11:54 AM
To: Satyal, Ajaya K
Cc: Miller, Randall B (Randy)
Subject: Calculation of Hourly Average Total VOC-RACT

AJ:

This memo serves as a follow-up summarizing our review today of calculations of hourly average total RACT-VOC emissions, and our review of this subject with Tom Tittle (FDEP, SED). The permit conditions include:

- Permit restriction of "4.0 lbs VOC/hr (averaged over a period of one month)"
- Log requirement of recording "the total time of paint spray booth usage"
- Log requirement of recording "the hourly average VOC emissions calculated for the month (in lbs of VOC per hour)"
- Hours of Operation: 1250 hours per consecutive 12-month period.

The question under discussion was:

- Is it correct to calculate the total hourly ave VOC emissions on total operation hours (spray booth use and preparation solvent use times), or only on total "Spray Booth Hours"?
- The preparation cleanup solvents are included in the Total VOC usage.

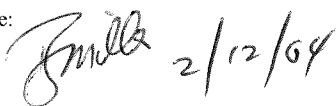
Tom Tittle of FDEP-SED advised:

- First, the 4.0 lbs VOC/hr permit restriction is not an EPA enforceable condition; permittee should consider removing it.
- It is sufficient to restrict VOC usage by the annual T/yr limit already in the permit.
- Additionally, to the question, Tom's advise was that spray gun cleanup is preparation time and should be included (except for the cases where spray gun cleaning solvents are directed into an enclosed container and properly disposed of as a hazardous waste).
- Preparation activities including surface wiping with solvents should be included in the time consideration if the solvent VOC emission is included in the total VOC emission for the period in question. The permittee must keep an accurate accounting of the preparation times, which may be separately recorded in the log, or more generally recorded with the spray booth usage time.
- It may be to the permittee's advantage to record prep and spray booth times separately, though, in order to assess compliance with the "paint spray booth usage" permit restriction.

Palm Beach County Health Department
 Division of Environmental Health and Engineering
 Air Pollution Control Section
 901 Evernia Street, West Palm Beach, FL 33401

INSPECTION REPORT

FACILITY INFORMATION			
Facility Name: Holland Pump Manufacturing, Inc.		Address: 7312 Westport Place, West Palm Beach, FL 33413	
ARMS ID No.: 0221	Air Permit No.: 099-0221-001-AO	Expiration Date: March 30, 2005	License: Y
Facility Contact: Patrick Sweeney Phone: (561) 697-3333		Title: Vice President	

INSPECTION SUMMARY			
Inspection Date: 02-04-04		Inspector: Fariba Ehsani	
Report Date: 02-11-04		Signature:	
Inspection Type: <input type="checkbox"/> CI-Complaint Inspection <input type="checkbox"/> STO-Stack Test Observed <input checked="" type="checkbox"/> INSP-Compliance Inspection <input type="checkbox"/> VEO-VE Observed <input type="checkbox"/> FUI-Follow Up Inspection		Inspection Subtype: <input type="checkbox"/> 1-Drive-by, shut down <input checked="" type="checkbox"/> 2-Walk through, plant indicators <input type="checkbox"/> 3-Witness test or CEM activity	
Compliance Status: <input checked="" type="checkbox"/> In Compliance <input type="checkbox"/> Out of Compliance, Minor <input type="checkbox"/> Out of Compliance, Significant		ARMS Updated: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Approval Date:  2/12/04	

Inspection Report

Observation:

- *One emission unit (paint spray booth).*
- *Replaceable filter pads (Filter pads must be replaced according to manometer reading and observation)*
- *Spray booth and its parts and equipment must be maintained and operated according to manufacturer's instructions. (Rule. 62-4.070(3), F.A.C.) (Permit No. AC50-166001)*

Permit Compliance Monitoring:

- *Hours of operation on the paint spray booth for last 12 consecutive month was reported as 812.75 hours which is less than 1250 hours per year.*
 - *VOC Limit was reported as 3680.02 lb for last 12 consecutive months, which is less than 2.5 tons.*
 - *VOC limit per gallon of coating was reported as 3.4-lb/gal coating, which is less than 3.5 lb/gal coating.*
 - *Emission rate was reported as 3.67 lb/hr of spraying which is less than 4.0 lb/hr.*
 - *Accepted test methodology is MSDS.*
 - *Daily Log was available at the time of inspection but the Degreaser was not recorded as part of records.*
 - *The facility will start recording the usage of degreaser as part of daily log.*
(Permit No.AC50-166001)
 - *Monthly Operation log was not recorded according to the condition of their permit.*
 - *The log had lack of following information:*
 - *Available amount of each compound at the beginning of the month, in pounds.*
 - *Amount remaining of each compound at the end of the month, in pounds.*
 - *Amount purchased of each compound during the month, in pounds.*
 - *The result of monthly inspection of the filter pads.*
 - *Maintenance log of the solvent capture system.*
- (Rule 62-296.500,F.A.C.)*

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Inventory list was calculated from submitted log.

(Rule 62-296.513(2)©, F.A.C.)

- 405.75 gal of Primer.
- 41.25 gal of Black paint.
- 90.41 gal of Polane Catalyst.
- 6.66 gal of Polane Accelerator.
- 276.80 gal of Blue Paint.
- 47.75 gal of White Paint.
- 90.80 gal. of Degreaser.

Chemical used in the Paint Spray booth:

- 1. Degreaser; (Wax and Grease remover)***
- 2. Accelerator; (V66VB11 by Polane)***
- 3. Catalyst; (V66V29 by Polane)***
- 4. Paint and Primer; by Sherwin Williams.***

Remark: The facility was trained on Log keeping and reporting Solvents as part of their log by Randy Miller and Fariba Ehsani on 2/11/04.