

AGENCY OF NATURAL RESOURCES

Waterbury, Vermont

ENVIRONMENTAL PROTECTION REGULATIONS

CHAPTER 5

AIR POLLUTION CONTROL

Subchapter II. Prohibitions

Subsection 5-253.12 Coating of Flat Wood Paneling

- (a) Applicability. This subsection applies to any flat wood paneling coating line, except any such coating line within any source whose actual emissions without control devices from all flat wood paneling coating lines within the source are less than 15 lbs of volatile organic compounds per day. Once a source is subject to this subsection, it shall remain so, even if its emissions later fall below the applicability threshold.
- (b) Definitions. For the purpose of this subsection, the following definitions apply, in addition to those of Section 5-101 of this chapter.

"Class II hardboard paneling finish" means finishes that meet the specifications of Voluntary Product Standard PS-59-73 as approved by the American National Standards Institute.

"Flat wood paneling coating line" means a coating line used to apply and dry or cure coatings applied to one of the following flat wood paneling product categories: printed interior panels made of hardwood plywood and thin particle board (i.e., less than or equal to 0.25 inches in thickness); natural finish hardwood plywood panels; and hardwood paneling with Class II finishes.

"Hardboard" is a panel manufactured primarily from inter-felted ligno-cellulosic fibers that are consolidated under heat and pressure in a hot press.

"Hardwood plywood" is plywood whose surface layer is a veneer of hardwood.

"Natural finish hardwood plywood panels" means panels whose original grain pattern is enhanced by essentially transparent finishes frequently supplemented by fillers and toners.

"Printed interior panels" means panels whose grain or natural surface is obscured by fillers and base coats upon which a simulated grain or decorative pattern is printed.

"Thin particleboard" is a manufactured board that is 0.25 inches or less in thickness made of individual wood particles that have been coated with a binder and formed into flat sheets by pressure.

- (c) Standards. No owner or operator of a flat wood paneling coating line subject to this subsection shall cause or allow, on any day, volatile organic compound emissions from the coating of any one of the following flat wood paneling product categories in excess of the emission limits in paragraphs (c)(1) through (3) of this subsection:

<u>Flat wood paneling product category</u>	<u>lb/1,000 ft²</u>
(1) Printed interior panels	6.0
(2) Natural finish hardwood plywood panels	12.0
(3) Class II finish on hardboard panels	10.0

Note; The above volatile organic compound emission limits are expressed in units of mass of VOC (lb) per area of surface to which the coating is applied (1,000 square feet).

- (d) Control devices.
- (1) As an alternative to compliance with the emission limits in paragraph (c) of this subsection, an owner or operator of a flat wood paneling coating line may comply with this subsection by:
- (i) Installing and operating a capture system and control device on that line; and
 - (ii) Demonstrating that the overall emission reduction efficiency achieved for that line is greater than or equal to the applicable standard under paragraph (c). The achieved and the required overall emission reduction efficiencies shall be determined in accordance with procedures and test methods specified by the Air Pollution Control Officer.
- (2) An owner or operator of a flat wood paneling coating line subject to this subsection shall ensure that:
- (i) A capture system and control device, if used, are operated at all times that the line is in operation, and the owner or operator demonstrates

compliance with this subsection in accordance with the coating analysis and capture system and control device efficiency test methods specified by the Air Pollution Control Officer; and

- (ii) The control device is equipped with the monitoring equipment required by the Air Pollution Control Officer, and such equipment is installed, calibrated, operated and maintained according to the vendor's specifications at all times the control device is in use. The monitoring equipment shall monitor the following parameters:
 - (A) Combustion chamber temperature of each thermal incinerator or afterburner;
 - (B) Temperature rise before the catalyst bed and across each catalytic incinerator bed; and
 - (C) The VOC concentration of the outlet from each carbon adsorption bed.
- (e) Record keeping and reporting.
 - (1) The owner or operator of a coating line complying with paragraph (c) of this subsection by means of the use of complying coatings shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of 5 years:
 - (i) The name and identification number of each coating as applied, used to coat each type of flat wood paneling product; and
 - (ii) The mass of VOC per area of surface to which the coating is applied to each type of flat wood paneling product (specified in paragraph (c) of this subsection) for each coating used each day in terms of lb VOC/1,000 ft² and the surface area coated each day of each type of flat wood paneling product.
 - (2) The owner or operator of any coating line complying with this subsection by the use of control devices shall perform such compliance testing, keep such records and furnish such reports as required by the Air Pollution Control Officer to demonstrate continuing compliance with this subsection.