



The State of New Hampshire  
**Department of Environmental Services**



**Robert R. Scott, Commissioner**

March 14, 2019

Kenneth Roy, Owner  
Complete Coverage Wood Priming  
288 Pinewood Road  
Allenstown, NH 03275

**Re: State Permit to Operate and Volatile Organic Compounds (VOC)  
Reasonably Available Control Technology (RACT) Order  
Complete Coverage Woodpriming LLC, 288 Pinewood Road, Allenstown, New Hampshire  
Facility Identification #3301390438, Applications #16-0107 and #18-0223**

Dear Mr. Roy:

The New Hampshire Department of Environmental Services hereby issues the enclosed permit and VOC RACT Order in accordance with the New Hampshire Code of Administrative Rules Env-A 100 *et seq.*, *New Hampshire Rules Governing the Control of Air Pollution*.

Enclosed please find a questionnaire distributed by our Public Information and Permitting Unit. We are constantly trying to improve our permit processing and your feedback is greatly appreciated. If you have any questions, please contact Barbara Dorfschmidt of the Air Resources Division, Permitting and Environmental Health Bureau at (603) 271-6796 or via e-mail at [barbara.dorfschmidt@des.nh.gov](mailto:barbara.dorfschmidt@des.nh.gov).

Sincerely,

Craig A. Wright  
Director  
Air Resources Division

CAW/bdd

Enclosures: SP-0147, Engineering Summary and VOC RACT Order

*By certified mail #7018 0680 0000 7433 3750*

ec: Donald Dahl, USEPA Region I  
Robert McConnell, USEPA Region I  
cc: Town Allenstown  
(all w/enclosures)

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Complete Coverage Woodpriming LLC	]	<b>Final RACT ORDER</b>
288 Pinewood Road	]	<b>March 14, 2019</b>
Allenstown, NH 03275	]	<b>RO-0004</b>
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### **A. Introduction**

This RACT Order is issued by the New Hampshire Department of Environmental Services, Air Resources Division, to Complete Coverage Woodpriming LLC, pursuant to RSA 125-C.

### **B. Parties**

1. The New Hampshire Department of Environmental Services, Air Resources Division (NHDES), is a duly constituted administrative agency of the State of New Hampshire having its principal offices at 29 Hazen Drive, Concord, NH 03302, telephone number (603) 271-1370.
2. Complete Coverage Woodpriming LLC (Complete Coverage) is a New Hampshire corporation having a principle office address of 288 Pinewood Road, Allenstown, NH 03275, telephone number (603) 485-1122.

### **C. Statements of Fact and Law**

1. Complete Coverage operates a facility that applies primer to clapboards and trim boards at 288 Pinewood Road in Allenstown, New Hampshire (the Facility).
2. Effective June 1, 2011, NHDES readopted the New Hampshire Code of Administrative Rules Env-A 1200, *Volatile Organic Compounds (VOCs) Reasonably Available Control Technology (RACT)* with amendments.
3. Env-A 1214 established VOC content limits for flat wood paneling coating operations. On and after January 1, 2016, a source whose flat wood paneling coating operations have combined actual emission, before controls, during any consecutive 12-month period which equal or exceed 3 tons of VOCs shall be subject to Env-A 1214.
4. Actual emissions of VOCs at the Facility are greater than 3 tons per consecutive 12-month period and, therefore, Complete Coverage became subject to Env-A 1214 on January 1, 2016.
5. Complete Coverage applies primer to clapboards and trim boards using a coating machine and spray gun. In addition, a stain blocker is spray applied to knots in the wood to prevent bleeding of the knots through the primer coat.
6. Complete Coverage currently utilizes coatings that are compliant with the emission limits contained in Env-A 1214 with the exception of the stain blocker.
7. On September 26, 2018, Complete Coverage submitted an application for a RACT Order requesting source-specific VOC coating limits be established for the coating process. The application contained a technical justification for the use of high-solvent based coating that is necessary to cover natural wood knots on eastern pine boards (stain blocker). Wood knots contain tannic acid which is soluble in water, so it will bleed through latex primers as the tannic acid in the wood dissolves in the water of the primer and discolors it. Tannic acid is not soluble in mineral spirits which is the solvent contained in the stain blocker used by Complete Coverage.

8. Complete Coverage, in concert with its main coating supplier, conducted trial tests of stain blockers with lower VOC contents and was unable to maintain the quality of product that is needed.
9. Complete Coverage proposed a VOC RACT limit for stain blockers of 2.96 lb VOC/gal coating, excluding water and exempt compounds, as applied. This limit was determined by evaluating the stain blocker used in the process and adding 5% to the VOC content.
10. Complete Coverage agreed to limit total VOC emissions from the wood paneling coating processes to 15 tons during any consecutive 12-month period.

#### **D. Order**

Based on the statements of fact and law, NHDES hereby orders Complete Coverage, effective upon issuance of this RACT Order, to comply with the following requirements as RACT:

1. Complete Coverage shall limit total VOC emissions from the wood paneling coating process to less than 15 tons during any consecutive 12-month period.
2. Complete Coverage shall control VOC emissions by using coatings that meet the following limits:
  - a. For stain blockers, the limit shall be 2.96 pounds of VOC per gallon coating (lb VOC/gal), as applied, excluding water and exempt compounds; and
  - b. For all other coatings, the limit shall be 2.1 pounds of VOC per gallon coating (lb VOC/gal), as applied, excluding water and exempt compounds
3. Complete Coverage shall follow all the requirements stated in Env-A 1214.03, *Work Practices for Waste Materials*.
4. Recordkeeping and Reporting Requirements
  - a. Complete Coverage shall maintain the following monthly records for coatings, thinners and cleaners which contain VOCs. This information, along with the VOC content records required in 4.b. below, shall be used to calculate the monthly VOC emissions from the process.
    - (i) Total quantity of raw materials used in the process; and
    - (ii) Total quantity of waste materials shipped off-site.
  - b. All coatings used at the Facility after the issuance of this RACT order shall be either tested using the methods listed in items (i) and (ii), below, or Complete Coverage will retain sufficient records for prima facie evidence in support of demonstrating compliance with the VOC RACT limit.
    - (i) Method 24, 40 CFR Part 60, Appendix A at 1-hour bake time, or an alternative test method approved by the Director and EPA; or
    - (ii) Method 24A, 40 CFR Part 60, Appendix A, or an alternative test method approved by the Director and EPA.
    - (iii) Prima facie evidence shall include all of the information required by the VOC data sheet found on either page II-2 or III-2, as applicable, of EPA document EPA-450/3-84-019, *Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings*, dated 1984.

If there is a discrepancy between the formulation data and the results of the Method 24 or 24A analysis, compliance shall be based on the results from the Method 24 or 24A analysis.

- c. Maintain records in accordance with Env-A 904, *VOC Emission Statements Recordkeeping Requirements*, and submit reports in accordance with Env-A 908, *VOC Emission Statements Reporting Requirements*.
- d. As part of the Annual Emissions Report submitted annually by April 15<sup>th</sup> of the following year, include information detailing efforts taken to find a stain blocker with lower VOC content. The report shall contain the following information:
  - (i) A technical evaluation of each alternative stain blocker considered and the basis for acceptance or rejection; or
  - (ii) A statement indicating that no stain blockers were evaluated during the time period covered by the report.

Please address any correspondence and communication in reference to this Order to the following:

Operating Permits Program Manager  
NHDES, Air Resources Division  
Permitting and Environmental Health Bureau  
29 Hazen Drive  
P.O. Box 95  
Concord, NH 03302-0095  
(603) 271-6796



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Craig A. Wright  
Director  
Air Resources Division

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cc: Town of Allenstown