

## Checklist: Recordkeeping Requirements

### Finishing operations (Check one compliance method and attach all relevant records)

- Compliant coatings
  - ! Certified product data sheets for each coating and thinner subject to the emission limits presented in the table below; and
  - ! The VHAP content, in lb VHAP/lb solids, as applied, for each coating subject to the emission limits presented in the table below.
  
- Compliant coatings with continuous coaters
  - Option 1
    - ! Same as requirements for compliant coatings. Records must demonstrate that the VHAP content does not exceed the applicable emission limit.
  - Option 2
    - 1. Certified product data sheets for each coating and thinner;
    - 2. Record of all solvent and coating additions to the reservoir; and
    - 3. All viscosity measurements.
  
- Averaging
  - 1. Certified product data sheets for each coating participating in averaging;
  - 2. Records of the amount of coating and thinner used each month;
  - 3. Copies of the averaging calculation.
  
- Add-on control device
  - 1. Certified product data sheets for each coating;
  - 2. Copies of the calculations demonstrating equivalency of using a control system;
  - 3. Records of the daily average value of each continuously monitored parameter; and
    - 1. For facilities using a fluidized bed catalytic incinerator, records of the pressure drop across the catalyst bed.
  
- Compliant coatings and control device or averaging and control device
  - ! Maintain all records required by each individual option.

### Gluing Operations

- Compliant contact adhesives
  - 1. Certified product data sheets for each contact adhesive subject to the emission limits presented in the table below;
  - 2. If adhesives are thinned, data sheets showing contact adhesive and thinner usage and calculation of the as applied VHAP content; and
  - 3. Records documenting the process in which the contact adhesive was used.
  
- Add-on control devices
  - 1. Certified product data sheet for each contact adhesive subject to the emission limits presented in the table below;
  - 2. Copies of calculations demonstrating the equivalency of using a control system;
  - 3. Records of the daily average value of each continuously monitored parameter; and
  - 4. For facilities using a fluidized bed catalytic incinerator, records of the pressure drop across the catalyst bed.

**Work Practice**

- Operator training program
  1. Copy of program, including:
    - ! a list of personnel required to be trained;
    - ! an outline of the subjects to be covered;
    - ! lesson plans for training courses;
  2. Records documenting successful completion of the training program for each individual; and
  3. Records of date each individual was trained.
  
- Inspection and maintenance plan
  1. Copies of checklists documenting visual monthly inspection of equipment; and
  2. Records demonstrating timeframe for making repairs.
  
- Cleaning and washoff solvent accounting system
  1. Record of the quantity and type of organic solvent used each month for washoff and cleaning;
  2. Record of the number of pieces washed off and the reason why; and
  3. Record of the quantity of spent solvent generated each month by operation and whether it is recycled onsite or disposed offsite.
  
- Spray booth cleaning
  - ! Records of VOC content of material used for cleaning spray booths
  
- Application equipment requirements
  - ! Records documenting that conventional air spray guns are only being used as allowed, including:
    - S if used for applying low VOC coatings, records showing that the VOC content is no greater than 1.0 lb VOC/lb solids;
    - S if used for applying small quantities of finishing materials, other than for touchup and repair, records of total finishing materials usage and quantity applied with air spray gun.
  
- Formulation assessment plan for finishing operations
  1. The facility has maintained MSDS for coatings containing VHAP of potential concern; and
  2. The facility has maintained usage records for coatings containing VHAP of potential concern.
  
- Limitation on chemical composition of cleaning/washoff solvents
  - ! The facility has maintained MSDS for all solvents used for cleaning and/or washoff.