A Guideline for Surface Coating Calculations
A Guide For Surface Coating Calculations

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ABSTRACT

The calculation of volatile organic compound emissions from surface coating operations to determine compliance is often a complicated task, sometimes creating confusion with compliance authorities and sources alike. In an attempt to minimize this confusion, EPA (OAQPS) has periodically issued guidance in this area, generally in the form of memoranda to the EPA Regional Offices. EPA guidance for submitting data on surface coatings and performing basic calculations is contained in the document entitled "Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink and Other Coatings," EPA 450/3-84-019, published in December 1984.

"A Guideline for Surface Coating Calculations" takes the above guidance process one step further. Example calculations are included for basic emission problems, compliance determinations, equivalency determinations, application of transfer efficiency, and calculations involving complex multiproduct plants. Graphs and tables useful in approximating and double-checking these calculations are also included.
SECTION 1
INTRODUCTION

1.1 BACKGROUND

Surface coating entails the deposition of a solid film on a surface through the application of a coating material such as paint, lacquer, or varnish. Surface coating operations are significant volatile organic compound (VOC) emission sources. Most coatings contain VOCs which evaporate during the coating application and curing processes, rather than becoming part of the dry film.

The U.S. Environmental Protection Agency (EPA) has issued Control Techniques Guidelines (CTGs) for many surface coating operations, including cans, metal coils, paper, fabric, automobiles, light-duty trucks, metal furniture, large appliances, magnet wire, miscellaneous metal parts and products, graphic arts, and flatwood paneling. The emission limits recommended in these guidelines have been adopted by many state and local agencies. The EPA has also issued new source performance standards (NSPS) for many surface coating operations, including automobile, light-duty trucks, beverage cans, metal coils, large appliances, metal furniture, pressure sensitive tapes and labels, vinyl printing and topcoating, and publication rotogravure printing.

To comply with these regulations, a surface coating operator might elect to change to low VOC content coatings, to use add-on controls such as incineration or carbon adsorption, or to improve transfer efficiency. In cases where compliance is achieved by a change in coating alone, VOC emissions can be calculated from the VOC content of the coating as applied to the substrate. When add-on controls or transfer efficiency improvements are used, more complex calculations can be performed to determine the effectiveness of the control strategy. It is more convenient (and frequently more reliable) to establish VOC compliance or non-compliance through these calculations than it is to measure total VOC emissions directly.
The emission limits for existing sources recommended in the CTGs and adopted by many state and local agencies are expressed in terms of pounds of VOC per gallon of coating less water. These units are directly useful only for cases where compliance is achieved with low VOC content coatings alone. When add-on controls or transfer efficiency improvements are used, compliance calculations must be done on an equivalent solids basis. The reasons for this are explained graphically in Glossary of Air Pollution Control of Industrial Coating Operations, EPA-450/3-83-013R, December 1983. Pages 26-29 of this document are located in Appendix A. The emission limits in most surface coating NSPSs are expressed in terms of pounds of VOC per gallon of coating solids applied. The reader should review this concept in Appendix A before continuing in this guideline manual. This calculation guide assumes that the solids used or applied in a specific process remain constant for a given example (solids equivalency).

1.2 DESCRIPTION OF VOC CALCULATIONS

This document presents sample calculations typical of those used to determine compliance or to evaluate control strategies. These step-by-step calculations are accompanied by explanations that are useful to persons unfamiliar with surface coating operations. Basic calculations are included along with calculations to determine compliance and equivalency (necessary for evaluating bubbles, offsets, netting, etc.). Transfer efficiency problems requiring a series of calculations are included.

The basis for most of the sample calculations is the information and procedures discussed in Procedure for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings, EPA-450/3-84-019, December 1984, which is reprinted as Appendix B of this report and referred to as the "VOC Data Sheets". The first VOC Data Sheet provides information on the VOCs present in a coating when it is sold by the manufacturer to the coater. This is referred to as the VOC content of the coating "as supplied by the coating manufacturer to the user." The second VOC Data Sheet provides information on the VOCs present in the coating as it is used by the coater and includes the effect of dilution solvent added before application. This is referred to as the VOC content "as applied to the substrate by the user."
dip or flow coating operations, this should include any make-up solvent which is added to a coating to replace evaporated solvent and therefore maintain a specific viscosity of the coating being applied. The calculations in this document assume that the inspector has obtained the coating data from the VOC Data Sheets. However, it is up to the inspector to verify this data. EPA Reference Method 24 or individual ASTM methods are the final judge in determining compliance. Appendix C contains a copy of Reference Method 24.

Some confusion may exist regarding the meanings and proper uses of terms. As defined in Appendix B, the term "as applied" means the condition of a coating after dilution by the user just prior to application to the substrate. However, the term "solids applied" means the amount coating solids that actually adheres to the object being coated, not the amount of solids leaving the applicator. In contrast, the term "solids used" refers to the total amount of solids used in an application, not the amount of solids that actually adheres to substrate. Care should be taken when using these terms to avoid confusion.

1.3 NEGLIGIBLY PHOTOCHEMICALLY REACTIVE MATERIALS

A volatile organic compound is defined in 40 CFR Subpart A, General Provisions, §60.2, as any organic compound which participates in atmospheric photochemical reactions; or which is measured by a reference method, an equivalent method, or an alternative method; or which is determined by procedures specified under any subpart. The EPA considers the following organic solvents to have negligible photochemical reactivity, and therefore does not consider them to be VOCs:

- Methane
- Ethane
- 1,1,1-trichloroethane (methyl chloroform)
- Methylene chloride
- Trichlorofluoromethane (CFC-11)
- Dichlorodifluoromethane (CFC-12)
- Chlorodifluoromethane (CFC-22)
- Trifluoromethane (CFC-23)
- Trichlorotrifluoroethane (CFC-113)
Many states also do not consider some or all of these materials to be VOCs.

Two of these compounds, 1,1,1-trichloroethane and methylene chloride, are used as solvents in some coatings. These materials should not be counted as VOCs if they are "exempt" from the applicable regulation. The method for discounting these materials is described in some of the examples and in Appendix B. Generally, these materials, when "exempt" from the applicable regulation, are treated in the same manner as water in emission calculations.

Only the compounds listed above and any compounds given the status of "negligibly photochemically reactive" by the U.S. EPA in a future Federal Register may be considered as exempt from Federal enforcement of applicable State SIP VOC regulations. Also, Rule 66 should not be referenced for exempting compounds as per 42 FR 35314, July 8, 1977.

\(^{1}\text{42 FR 35314, July 8, 1977}\)
\(^{2}\text{45 FR 32042, June 4, 1979}\)
\(^{3}\text{45 FR 48941, July 22, 1980}\)
SECTION 2
BASIC CALCULATIONS

This section presents examples of basic types of calculations. The examples closely follow the VOC Data Sheets (Appendix B).

2.1 DETERMINING THE MASS OF VOC EMITTED PER VOLUME OF SOLIDS

Example 1 -
Determine the mass of VOC emitted per volume of solids for a solvent-borne coating. The following data are given:

A. Coating Density = 10.0 lb/gal
B. Total Volatiles = 60 percent by weight
C. Water Content = 0
D. Organic* Volatiles Content = 60 percent by weight
E. Nonvolatiles Content (Solids) = 35 percent by volume

Mass of VOC emitted per volume of solids is:

\[
\frac{10.0 \text{ lb coating}}{\text{gal coating}} \times \frac{0.60 \text{ lb VOC}}{1 \text{lb coating}} \times \frac{1 \text{gal coating}}{0.35 \text{ gal solids}} = 17.1 \text{ lb VOC gal solids}
\]

Example 2 -
Determine the mass of VOC emitted per volume of solids for a waterborne coating. The following data are given:

A. Coating Density = 9.0 lb/gal
B. Total Volatiles = 70 percent by weight
C. Water Content = 30 percent by weight
D. Organic* Volatiles Content = 70-30-40 percent by weight
E. Nonvolatiles Content (Solids) = 19.6 percent by volume

*Photochemically reactive materials only.
Mass of VOC emitted per volume of solids is:
\[
\frac{9.0 \text{ lb coating}}{\text{gal coating}} \times \frac{0.40 \text{ lb VOC}}{1 \text{ lb coating}} \times \frac{1 \text{ gal coating}}{0.198 \text{ gal solids}} = \frac{18.4 \text{ lb VOC}}{\text{gal solids}}
\]

Example 3 -

Determine the mass of VOC emitted per volume of solids for a coating that contains some negligibly photochemically reactive (NPR) solvents. The following data are given:

A. Coating Density = 11.0 lb/gal
B. Total Volatiles = 80 percent by weight
C. NPR Solvent Content = 40 percent by weight
D. Organic* Volatiles Content = 40 percent by weight
E. Nonvolatiles Content = 15 percent by volume (Solids)

Mass of VOC emitted per volume of solids is:
\[
\frac{11.0 \text{ lb coating}}{\text{gal coating}} \times \frac{0.40 \text{ lb VOC}}{1 \text{ lb coating}} \times \frac{1 \text{ gal coating}}{0.15 \text{ gal solids}} = \frac{29.3 \text{ lb VOC}}{\text{gal solids}}
\]

2.2 DETERMINING THE MASS OF VOC EMITTED PER VOLUME OF COATING LESS WATER

Example 4 -

Determine the mass of VOC emitted per volume of coating less water for a solvent-borne coating. The following data are given:

A. Coating Density = 10 lb/gal
B. Total Volatiles = 60 percent weight
C. Water Content = 0
D. Organic* Volatiles Content = 60 percent weight

Mass of VOC per volume of coating less water is:
\[
\frac{10 \text{ lb coating}}{\text{gal coating}} \times \frac{0.60 \text{ lb VOC}}{1 \text{ lb coating}} \times \frac{1 \text{ gal coating}}{0.60 \text{ gal coating less water}} = \frac{6 \text{ lb VOC}}{\text{gal coating less water}}
\]

*Photochemically reactive materials only.
Example 5 -

Determine the mass of VOC emitted per volume of coating less water for a water-borne coating. The following data are given:

A. Coating Density = 9.0 lb/gal
B. Total Volatiles = 70 percent by weight
C. Water Content = 30 percent by weight
D. Organic* Volatiles Content = 70-30=40 percent by weight

The mass of water in the coating is:

\[
\frac{9.0 \text{ lb coating}}{\text{gal coating}} \times \frac{0.3 \text{ lb water}}{1 \text{ lb coating}} = \frac{2.7 \text{ lb water}}{\text{gal coating}}
\]

The volume of water in the coating is:

\[
\frac{2.7 \text{ lb water}}{\text{gal coating}} \times \frac{1}{0.33 \text{ lb water}} = \frac{0.32 \text{ gal water}}{\text{gal coating}}
\]

The mass of VOC in the coating is:

\[
\frac{9.0 \text{ lb coating}}{\text{gal coating}} \times \frac{0.4 \text{ lb VOC}}{1 \text{ lb coating}} = \frac{3.6 \text{ lb VOC}}{\text{gal coating}}
\]

The mass of VOC emitted per volume of coating less water is:

\[
\frac{3.6 \text{ lb VOC}}{\text{gal coating}} - \frac{0.32 \text{ gal water}}{\text{gal coating}} = \frac{5.3 \text{ lb VOC}}{\text{gal coating}}
\]

Example 6 -

Determine the mass of VOC emitted per gallon of coating less negligibly photochemically reactive material for a coating that contains some negligibly photochemically reactive material.

The following data are given:

A. Coating Density = 10.5 lb/gallon
B. Total Volatiles = 80 percent by weight
C. NPR Solvent Content = 40 percent by weight
D. Organic* Volatiles Content = 40 percent by weight
E. NPR Solvent Density = 11.0 lb/gal

*Photochemically reactive materials only.
The mass of VOC per volume of coating is:
\[
\frac{10.5 \text{ lb coating}}{\text{gal coating}} \times \frac{0.4 \text{ lb VOC}}{1 \text{ lb coating}} = \frac{4.2 \text{ lb VOC}}{\text{gal coating}}
\]
The mass of NPR solvent in the coating is:
\[
\frac{10.5 \text{ lb coating}}{\text{gal coating}} \times \frac{0.4 \text{ lb NPR solvent}}{1 \text{ lb coating}} = \frac{4.2 \text{ lb NPR solvent}}{\text{gal coating}}
\]
The volume of NPR solvent in the coating is:
\[
\frac{4.2 \text{ lb NPR solvent}}{\text{gal coating}} \times \frac{1}{11.0 \text{ lb NPR solvent}} = \frac{0.38 \text{ gal NPR solvent}}{\text{gal coating}}
\]
The mass of VOC per gallon of coating less NPR solvent is:
\[
\frac{4.2 \text{ lb VOC}}{\text{gal coating}} - \frac{0.38 \text{ gal NPR solvent}}{\text{gal coating}} = \frac{6.8 \text{ lb VOC}}{1 \text{ gal coating}}
\]
SECTION 3
TRANSFER EFFICIENCY

When spray guns are used to apply coatings, much of the coating material either bounces off the surface being coated or misses it altogether. Transfer efficiency (TE) is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used. Regardless of the TE, all of the VOCs in the dispensed coating are emitted whether or not the coating actually reaches and adheres to the surface. Consequently, improved TE can reduce VOC emissions because less coating is used. EPA has defined baseline transfer efficiencies of 60 percent for RACT in metal furniture and appliance coating and 30 percent for RACT waterborne equivalence in the automobile industry (for both primer-surfacer and topcoat applications). If a base TE has not been documented by EPA, then the company must satisfactorily document their base TE prior to equivalency calculations/demonstrations. To obtain TE credits, a company must prove its baseline TE with documentation, and document the new TE.

3.1 DETERMINING THE MASS OF VOC EMITTED PER VOLUME OF SOLIDS APPLIED

Example 1 -

Determine the mass of VOC emitted per volume of solids applied given the following data:

A. VOC content of coating \[= \frac{4.0 \text{ lb VOC}}{\text{gal solids}}\]

B. Transfer efficiency \[= 40 \text{ percent}\]

Mass of VOC emitted per volume of solids applied is:

\[
\frac{4.0 \text{ lb VOC}}{\text{gal solids}} \times \frac{1 \text{ gal solids used}}{0.4 \text{ gal solids applied}} = \frac{10.0 \text{ lb VOC}}{\text{gal solids applied}}
\]
Example 2 -

Determine the mass of VOC emitted per volume of solids applied given the following data:

A. VOC content of coating = 3.0 lb VOC/gal coating less water
B. Nonvolatiles content = 55 percent by volume
C. Transfer efficiency = 60 percent
D. Water Content = None

\[
\frac{3.0 \text{ lb VOC}}{\text{gal coating less water}} \times \frac{1 \text{ gal coating less water}}{0.55 \text{ gal solids}} \times \frac{1 \text{ gal solids used}}{0.60 \text{ gal solids applied}} = \frac{9.1 \text{ lb VOC}}{1 \text{ gallon solids applied}}
\]

Note: For a waterborne coating, be careful of using pounds of VOC per gallon of coating less water and volume nonvolatiles content as a fraction of the total coating including water. These two items cannot simply be combined to get pounds of VOC per gallon of solids. The best method is to follow Example 2 in Section 2 and then factor in transfer efficiency. Alternatively, the volume nonvolatiles content could be determined for the coating less water if the volume fraction water is known or calculated as follows:

\[
\text{Volume fraction nonvolatiles in coating less water} = \frac{\text{volume fraction nonvolatiles in coating including water}}{1 - \text{volume fraction water}}
\]

3.2 CALCULATING AVERAGE TRANSFER EFFICIENCY

Example 3 -

A plant operates two coating lines. Each line uses both manual electrostatic spray guns (TE = 60 percent) and rotating-head electrostatic spray guns (TE = 80 percent). Table 1 contains the applicable data. What is the average transfer efficiency?

Average TE = \[
\frac{\text{total liters of solids deposited}}{\text{total liters of solids used}} \times 100
\]

\[
\frac{38.4 + 36.8}{64 + 46} \times 100 = \frac{75.2}{110} \times 100 = 68 \text{ percent}
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*These TE values are illustrative values only. Actual TE must be determined to calculate actual emissions.*
SECTION 4
COMPLIANCE DETERMINATIONS

4.1 CALCULATING COATING COMPLIANCE WITH A STANDARD

Example 1 -
A coater is required to meet an emission limit of 3.5 pounds of VOC per gallon of coating less water. Does a coating with a density of 12 pounds per gallon that contains 25 weight percent VOC comply? The coating contains no water or negligibly photochemically reactive solvents.

\[
\frac{12 \text{ lb coating}}{\text{gal coating}} \times \frac{0.25 \text{ lb VOC}}{\text{lb coating}} \times \frac{1 \text{ gal coating}}{(1-0) \text{ gal coating less water}}
\]

\[
= \frac{3 \text{ lb VOC}}{\text{gal coating less water}}
\]

So, the coating complies with the regulation.

Example 2 -
A coater is required to meet an emission limit of 4.0 pounds VOC per gallon of solids. Does a coating with a density of 10 pounds per gallon that contains 60 weight percent volatiles, 45 weight percent water, and 30 volume percent solids comply?

The weight percent organic volatiles is 60-45=15.

The VOC content of the coating is:

\[
\frac{10 \text{ lb coating}}{\text{gal coating}} \times \frac{0.15 \text{ lb VOC}}{\text{lb coating}} \times \frac{1 \text{ gal coating}}{0.30 \text{ gal solids}} = 5 \text{ lb VOC}
\]

So, the coating does not comply with the regulation.
Example 3 -

A coater is required to meet an emission limit of 10 pounds VOC per gallon of solids applied. Does the coating in Example 2 comply if it is applied at a transfer efficiency of 80 percent?

\[
\frac{5 \text{ lb VOC}}{\text{gal solids}} \times \frac{1 \text{ gal solids used}}{0.80 \text{ gallon solids applied}} = \frac{6.3 \text{ lb VOC}}{\text{gal solids applied}}
\]

So, the coating meets the regulation.

---

Example 4 -

A metal furniture coater uses a coating containing 0.40 kg VOC/liter of coating (less water and exempt solvents). The coating contains 55 volume percent solids. The transfer efficiency is 87 percent. Is the plant in compliance if the maximum allowable emissions are 1.0 kg VOC/liter solids applied?

The solution is found by using the following basic equation:

\[
\frac{\text{mass of VOC used}}{\text{volume of coating solids used}} \times \frac{1}{\text{TE}} = \frac{\text{mass of VOC used}}{\text{volume of coating solids applied}}
\]

Emissions are:

\[
1 \text{ liter of coating less water and exempt solvents} \times \frac{0.40 \text{ kg VOC}}{1 \text{ liter coating less water and exempt solvents}} \times \frac{1}{0.55 \text{ liter solids}} = 0.84 \text{ kg VOC}
\]

\[
0.87 \text{ liter solids} = 1 \text{ liter solids applied}
\]

Since 0.84 is less than 1.0, the coating operation is in compliance.

Note: This example is similar to Example 2 in Section 3.1. Therefore, the note mentioned after Example 2 applies to this example too.

---

4.2 CALCULATING COMPLIANCE WHEN ADD-ON CONTROLS ARE USED

Example 5 -

A coater is required to meet an emission limit of 6 pounds of VOC per gallon of solids. What percent emission reduction is needed if the coater uses a coating with 22 pounds of VOC per gallon of solids?
\[
\frac{22-6}{22} \times 100 = \frac{16}{22} \times 100 = 73 \text{ percent emission reduction}
\]

---

Example 6 -

A coater is required to meet an emission limit of 3.7 pounds of VOC per gallon of coating less water. What percent emission reduction is needed if the coater uses a solvent-borne coating with 5.0 pounds of VOC per gallon of coating less water and a volume solids content of 25 percent?

This calculation must be done on a solids basis. First, the emission limit must be converted to pounds of VOC per gallon of solids. To do this, an assumed VOC density of 7.36 pounds per gallon is used to calculate the volume solids content of the "presumptive" RACT coating.

\[
\frac{3.7 \text{ lb VOC}}{\text{gal coating less water}} \times \frac{1 \text{ gal VOC}}{7.36 \text{ lb VOC}} \times 100 = 50 \text{ volume percent VOC}
\]

\[
100-50 = 50 \text{ volume percent solids}
\]

\[
\frac{3.7 \text{ lb VOC}}{\text{gal coating}} \times \frac{1 \text{ gal coating}}{0.50 \text{ gal solids}} = \frac{7.4 \text{ lb VOC}}{\text{gal solids}}
\]

Next, the VOC content of the coating used must also be calculated on a solids basis.

\[
\frac{5.0 \text{ lb VOC}}{\text{gal coating}} \times \frac{1 \text{ gal coating}}{0.25 \text{ gal solids}} = \frac{20 \text{ lb VOC}}{\text{gal solids}}
\]

Now the required percent reduction can be calculated.

\[
\frac{20-7.4}{20} \times 100 = 63 \text{ percent emission reduction}
\]

Notes:

1. An erroneous result is obtained if this calculation is not done on a solids basis. Using pounds of VOC per gallon of coating less water the result would be:

\[
\frac{5.0-3.7}{5.0} \times 100 = 26 \text{ percent emission reduction}
\]

This would not give equivalent emissions as it does not take into account that the "presumptive" RACT coating not only has lower VOC content, but higher solids content as well.
2. An assumed VOC density of 7.36 pounds per gallon is used to calculate the volume solids content of the "presumptive" RACT coating because this same value was used to determine the "presumptive" recommended RACT emission limits from volume solids data.

3. The volume solids content of actual coatings should be determined directly from coating formulation data as described in the VOC Data Sheets. Occasionally, it may be useful to back calculate volume solids from VOC content and actual solvent or VOC density, but this must be done with extreme caution.
When an inspector gathers data on the actual coatings used at a facility, the volume solids content should be obtained from coating formulation data from the facility or the coating manufacturer. The volume solids content should not be back calculated.
SECTION 5
EQUIVALENCY DETERMINATIONS

Equivalency calculations are required when compliance decisions must be made for replacement coatings, bubbles, offsets, netting, etc. This type of calculation relates primarily to the CTG source categories. This section presents example equivalency calculations.

VOC equivalency calculations must be made on a solids basis. The amount of solids needed to coat a surface to a particular film thickness is the same regardless of the coating composition used. Reducing the solids content of an organic solvent-borne coating increases the quantity of coating required and increases VOC emissions because more coating is used and the coating has a higher VOC content.

5.1 CALCULATING ALLOWABLE HOURLY EMISSIONS FOR A SOLVENT-BORNE COATING*

Example 1 -

A surface coater uses 10 gallons per hour of a coating that contains 5.5 lb VOC per gallon of coating and 25 volume percent solids. New regulations indicate that the coating formulation must meet an emission limit of 3.0 lb of VOC per gallon of coating (with a solvent density of 7.36 lb per gallon) or the coater must control VOC emissions to an equivalent level. Assuming that the production rate (solids usage rate), transfer efficiency, and film thickness stay constant, what are the coater's "allowable" hourly VOC emissions?

For the existing coating, the actual VOC emissions are:

\[
10 \frac{\text{gal coating}}{h} \times 5.5 \frac{\text{lb VOC}}{\text{gal coating}} = 55 \frac{\text{lb VOC}}{h}
\]

*This example presents a method for determining hourly VOC mass emissions for offset calculations; however, RACT limitations should normally be based on either applicable coating formulations or control efficiency requirements. An hourly cap would normally only be used in addition to these RACT limitations.
The solids usage rate is:

\[
\frac{10\text{ gal coating}}{h} \times \frac{0.25\text{ gal solids}}{\text{gal coating}} = \frac{2.5\text{ gal solids}}{h}
\]

For the complying coating, the VOC (solvent) volume fraction is:

\[
\frac{3.0\text{ lb VOC}}{\text{gal coating}} \times \frac{1\text{ gal VOC}}{7.38\text{ lb VOC}} = \frac{0.41\text{ gal VOC}}{\text{gal coating}}
\]

The complying coating solids volume fraction is:

\[
1.0 - 0.41 = \frac{0.59\text{ gal solids}}{\text{gal coating}}
\]

Using the solids usage rate calculated above, the gallons of complying coating required are:

\[
\frac{2.5\text{ gal solids}}{h} \times \frac{\text{gal coating}}{0.59\text{ gal solids}} = \frac{4.24\text{ gal complying coating}}{h}
\]

The emissions rate at the existing solids applied rate is:

\[
\frac{3.0\text{ lb VOC}}{\text{gal coating}} \times \frac{4.24\text{ gal coating}}{h} = \frac{12.72\text{ lb VOC}}{h}
\]

5.2 EQUIVALENCY CALCULATIONS FOR A CAN COATING OPERATION

Example 2 -

The RACT equivalence requirements for can coating operations are tabulated in 45 FR 80825, dated December 8, 1980. An analysis of two coatings used in an actual plant is:

<table>
<thead>
<tr>
<th>Coating No. 1</th>
<th>Coating No. 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1) Actual pounds of VOC per gallon of coating less water and exempt solvents as applied</td>
<td>5.42</td>
</tr>
<tr>
<td>(2) Gallons of each coating applied</td>
<td>110</td>
</tr>
<tr>
<td>(3) Control efficiency, percent</td>
<td>0.81</td>
</tr>
<tr>
<td>(4) Volume percent water and exempt solvents in coatings</td>
<td></td>
</tr>
</tbody>
</table>

(continued)
(5) Volume percent solids

Coating No. 1: 26.4
Coating No. 2: 50.0

(6) Allowable emission limit, lb VOC/gal coating less water and exempt solvents

Coating No. 1: 2.8
Coating No. 2: 2.8

Calculate the following:

(1) Gallons of solids applied.
(2) Pounds of VOC per gallon of solids.
(3) Pounds of VOC emitted.
(4) Allowable VOC emissions.

Answers:

(1) The gallons of solids applied can be calculated as follows:

\[
\text{Gallons of solids applied} = \left(\frac{\text{gallons of coating used}}{100}\right) \times \left(\frac{\text{volume percent solids}}{100}\right) 
\]

(Since the quantity of solids used in the equation appears as a percentage it is necessary to divide by 100%.)

Coating No. 1:

110 gal coating applied \(\times\) \(\frac{26.4 \text{ gal solids}}{100 \text{ gal coating applied}}\) = 29 gal solids

Coating No. 2:

240 gal coating applied \(\times\) \(\frac{50 \text{ gal solids}}{100 \text{ gal coating applied}}\) = 120 gal solids

(2) As noted on Page 10, the pounds of VOC per gallon of solids can be calculated as follows:

\[
\frac{\text{lb VOC}}{\text{gal of solids}} = \frac{\text{lb VOC/gal coating less water and exempt compounds}}{\text{volume percent solids}} \times \frac{\text{100-volume percent water and nonvolatile exempt comp.}}{100}
\]
Coating No. 1:

\[
\frac{5.42 \text{ lb VOC}}{\text{gal coating}} \times \frac{100 \text{ gal coating}}{26.4 \text{ gal solids}} \times \frac{100 - 0 \text{ gal coating less water}}{100 \text{ gal coating}} = \frac{20.53 \text{ lb VOC}}{\text{gal solids}}
\]

Coating No. 2:

\[
\frac{1.09 \text{ lb VOC}}{\text{gal coating}} \times \frac{100 \text{ gal coating}}{50.0 \text{ gal solids}} \times \frac{100 - 41.3 \text{ gal coating less water}}{100 \text{ gal coating}} = \frac{1.28 \text{ lb VOC}}{\text{gal solids}}
\]

(3) The pounds of VOC emitted can be calculated as follows:

\[
\frac{\text{lb of VOC}}{\text{gal of solids}} \times \text{gal of solids} \times (1 - \text{overall control efficiency}^*)
\]

Coating No. 1:

\[
\frac{20.53 \text{ lb VOC}}{\text{gal solids}} \times 29.0 \text{ gal solids} \times (1 - 0.81) = 113.1 \text{ lb VOC}
\]

Coating No. 2:

\[
\frac{1.28 \text{ lb VOC}}{\text{gal solids}} \times 120 \text{ gal solids} \times (1 - 0) = 153.6 \text{ lb VOC}
\]

(4) The allowable VOC emissions can be calculated as follows:

As calculated in Item (2), the gallons of solids applied for coatings No. 1 and No. 2 were 29 and 120, respectively. Assume that the coater will apply the same volume of solids with a RACT complying coating.

Given:

(1) Emission limit: 2.8 lb VOC/gal coating

(2) VOC density: 7.36 lb VOC/gal

*The overall control efficiency is equal to the fraction of total VOC used that is destroyed or recovered by the control system. Overall control efficiency = capture device efficiency x control device efficiency.
Allowable pounds of VOC = gallons of complying coating applied \times \text{allowable emission limit},

\[
\text{gal solids applied (per unit of time)} \quad \frac{\text{volume fraction solids in complying coating}}{\text{gal coating}} \times \frac{2.8 \text{ lb VOC}}{\text{gal coating less water and exempt solvents}}
\]

Volume fraction VOC:

\[
\frac{2.8 \text{ lb VOC}}{\text{gal coating}} \times \frac{1 \text{ gal VOC}}{7.36 \text{ lb VOC}} = \frac{0.38 \text{ gal VOC}}{\text{gal coating}}
\]

Volume fraction solids:

\[
1 = 0.38 \text{ gal coating} \times \frac{0.62 \text{ gal solids}}{\text{gal coating}}
\]

Allowable pounds of VOC for Coating No. 1:

\[
29 \text{ gal solids} \times \frac{1 \text{ gal coating}}{0.62 \text{ gal solids}} \times \frac{2.8 \text{ lb VOC}}{\text{gal coating}} = 131 \text{ lb VOC}
\]

Allowable pounds of VOC for Coating No. 2:

\[
120 \text{ gal solids} \times \frac{\text{gal coating}}{0.62 \text{ gal solids}} \times \frac{2.8 \text{ lb VOC}}{\text{gal coating}} = 542 \text{ lb VOC}
\]

Table 2 shows the calculation sequence.
<table>
<thead>
<tr>
<th></th>
<th>Lb VOC/gal coating less water (a)*</th>
<th>Volume % solids (b)*</th>
<th>Volume % solvent (c)</th>
<th>Volume % water (d)*</th>
<th>Lb VOC/gal solids (e)</th>
<th>Application rate (gal/units produced) (f)*</th>
<th>Units produced (g)*</th>
<th>Gal coating applied (h)</th>
<th>Gal solids applied (i)</th>
<th>Overall Add-on Control efficiency (j)*</th>
<th>Lb of VOC (e x l) [1 \times \text{I} ] (k)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sheet coating</td>
<td>5.42</td>
<td>25.4</td>
<td>-</td>
<td>0</td>
<td>20.52</td>
<td>22</td>
<td>5</td>
<td>110</td>
<td>29.0</td>
<td>0.81</td>
<td>113.0</td>
</tr>
<tr>
<td>Sheet coating</td>
<td>1.09</td>
<td>50.0</td>
<td>-</td>
<td>0</td>
<td>1.28</td>
<td>10</td>
<td>24</td>
<td>240</td>
<td>120.0</td>
<td>-</td>
<td>153.0</td>
</tr>
<tr>
<td>Sheet coating</td>
<td>5.06</td>
<td>31.2</td>
<td>-</td>
<td>0</td>
<td>16.23</td>
<td>10</td>
<td>24</td>
<td>240</td>
<td>74.9</td>
<td>0.81</td>
<td>231.0</td>
</tr>
<tr>
<td>Side seam</td>
<td>6.34</td>
<td>13.9</td>
<td>-</td>
<td>0</td>
<td>45.59</td>
<td>1.5</td>
<td>18</td>
<td>27</td>
<td>3.8</td>
<td>-</td>
<td>173.8</td>
</tr>
<tr>
<td>Inside spray</td>
<td>3.21</td>
<td>16.0</td>
<td>-</td>
<td>0</td>
<td>8.33</td>
<td>8</td>
<td>24</td>
<td>192</td>
<td>30.7</td>
<td>-</td>
<td>256.7</td>
</tr>
<tr>
<td>End compound</td>
<td>4.20</td>
<td>42.9</td>
<td>-</td>
<td>0</td>
<td>9.80</td>
<td>1.5</td>
<td>24</td>
<td>36</td>
<td>15.4</td>
<td>-</td>
<td>150.0</td>
</tr>
</tbody>
</table>

**ACTUAL TOTAL EMISSIONS**

1,077.5

<table>
<thead>
<tr>
<th></th>
<th>Allowable Emissions Using Complying Coating (b)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sheet coating</td>
<td>2.8</td>
</tr>
<tr>
<td>Sheet coating</td>
<td>2.8</td>
</tr>
<tr>
<td>Sheet coating</td>
<td>2.8</td>
</tr>
<tr>
<td>Side seam</td>
<td>5.5</td>
</tr>
<tr>
<td>Inside spray</td>
<td>4.2</td>
</tr>
<tr>
<td>End compound</td>
<td>3.7</td>
</tr>
</tbody>
</table>

**ACTUAL TOTAL EMISSIONS**

1,509.5

*Note: Data in columns a, b, d, f, g, and j (under actual emissions) were obtained from plant records including thinning solvent. Data in columns a, b, and d were determined using procedures in the VOC Data Sheets.

For actual coatings, \( \epsilon = \frac{b}{100 \times d} \)

For complying coatings, \( \epsilon = 1 - \frac{a}{b} \)

\( \epsilon \) For actual coatings, \( \epsilon = \frac{b}{100 \times d} \)
| TABLE 2. (continued) |

D = Presumed density of VOC for complying coating (7.36 lb/gal).

2Control efficiency varies with emission control devices used. The percent capture and control efficiency must be established by using approved test methods. The source must always maintain process and control system parameters as close as possible to those used in the original capture and control efficiency demonstration. If there are any significant changes in these parameters, the source must make a new capture and/or control efficiency demonstration as deemed appropriate by the compliance authority.

3Concept based on the following principal for comparing actual and allowable emissions: 1 lb VOC emitted = 1 lb VOC/gal of solids x gal of solids applied per unit. (Same gal of solids applied for actual and allowable emissions.)

4Complies with State VOC emission limitations.
SECTION 6
COMPLEX CALCULATIONS

This section presents example calculations demonstrating situations that may require a series of calculations.

6.1 COMPLIANCE DETERMINATION FOR AUTO PLANT PRIMER-SURFACER (GUIDE COAT) OPERATION

Example 1 -

An auto primer-surfacer operation uses a coating that contains 3.58 lb VOC/gal of coating with a transfer efficiency of 50 percent. The RACT emission limit is 2.8 lb VOC/gal of coating less water at 30 percent transfer efficiency (waterborne equivalence). Is the operation in compliance?

Given: (1) The manufacturer's data show that the undiluted coating has 50.0 volume percent solids.

(2) The plant adds 0.05 gal of thinner blend per gallon of undiluted coating:

(a) 0.02 gallon of thinner No. 1/gallon undiluted coating (thinner density 7.36 lb/gal).

(b) 0.02 gallon of thinner No. 2/gallon undiluted coating (thinner density 5.43 lb/gal).

(c) 0.01 gallon of thinner No. 3/gallon undiluted coating (thinner density 9.52 lb/gal).

(3) The density of the undiluted coating is 10.25 lb/gal.

(4) Weight fraction of VOC in undiluted coating =

\[
\frac{0.333 \text{ lb VOC solvent}}{\text{lb undiluted coating}}
\]
First, verify the VOC content of the coating. In order to do this, the VOC content of the undiluted coating and the thinners must be calculated. The mass of VOC in the undiluted coating is:

\[
\frac{0.333 \text{ lb VOC}}{1 \text{ lb undiluted coating}} \times \frac{10.25 \text{ lb undiluted coating}}{\text{gal undiluted coating}} = \frac{3.41 \text{ lb VOC}}{\text{gal undiluted coating}}
\]

The mass of thinner added per gallon of undiluted coating is:

\[
\frac{0.02 \text{ gal thinner No. 1}}{\text{gal undiluted coating}} \times \frac{7.36 \text{ lb thinner No. 1}}{\text{gal thinner No. 1}} + \frac{0.02 \text{ gal thinner No. 2}}{\text{gal undiluted coating}} \times \frac{5.43 \text{ lb thinner No. 2}}{\text{gal thinner No. 2}} + \frac{0.01 \text{ gal thinner No. 3}}{\text{gal undiluted coating}} \times \frac{9.52 \text{ lb thinner No. 3}}{\text{gal thinner No. 3}} = 0.147 + 0.109 + 0.095 = \frac{0.351 \text{ lb thinner}}{\text{gal undiluted coating}}
\]

The mass VOC per volume coating at application is:

\[
\frac{3.41 \text{ lb VOC/gal undiluted coating}}{1.05 \text{ gal coating/gal undiluted coating}} = \frac{3.58 \text{ lb VOC/gal coating}}{1.05}
\]

The undiluted coating has 50.0 volume percent solids. After the coating is diluted with 0.05 gallon of thinner per gallon of coating, the volume percent solids is:

\[
\frac{0.50}{1 + 0.05} = \frac{0.48 \text{ gal solids}}{\text{volume coating}}
\]

The equivalency calculations must be made on a solids basis. The formula for determining the maximum allowable emissions on a solids basis is:

\[
\text{Allowable emissions} = \frac{\text{allowable mass of VOC per volume coating}}{(\text{baseline YE})(\text{baseline volume solids})}
\]

As noted in earlier examples, an assumed VOC density of 7.36 gal is used to calculate the volume solids content of the "presumptive" RACT coating.

The volume of VOC in the "presumptive" RACT coating is:

\[
\frac{2.8 \text{ lb VOC}}{\text{gal coating}} \times \frac{1 \text{ gal VOC}}{7.36 \text{ lb VOC}} = \frac{0.38 \text{ gal VOC}}{\text{gal coating}}
\]
Therefore, the baseline volume of solids is:

\[ 1 - 0.38 = \frac{0.62 \text{ gal solids}}{\text{gal coating}} \]

Allowable emissions are:

\[ \frac{2.8 \text{ lb VOC}}{\text{gal coating}} \times \frac{1 \text{ gal coating}}{0.62 \text{ gal solids}} \times \frac{1 \text{ gal solids}}{0.30 \text{ gal solids applied}} = \frac{15.1 \text{ lb VOC}}{\text{gal solids applied}} \]

The formula for actual emissions is:

\[
\text{Actual emissions} = \frac{\text{actual mass VOC per volume coating}}{(\text{actual} \times \text{TE})} \times \frac{\text{actual volume solids}}{\text{gal coating}}
\]

The actual mass of VOC per volume coating is 3.58 lb VOC/gallon coating. The actual transfer efficiency is 50 percent. The actual volume of solids in the sprayed coating is 48 percent.

Actual emissions are:

\[ \frac{3.58 \text{ lb VOC}}{\text{gal coating}} \times \frac{1 \text{ gal coating}}{0.48 \text{ gal solids}} \times \frac{1 \text{ gal solids}}{0.50 \text{ gal solids applied}} = \frac{14.9 \text{ lb VOC}}{\text{gal solids applied}} \]

Actual emissions (14.9 lb VOC per gallon of solids applied) are less than the maximum allowable emissions (15.1 lb VOC per gallon of solids applied); therefore, the operation is in compliance.
### Example 2

A large appliance manufacturer has a coating operation that employs electrostatic spray coating equipment and manual spray coating equipment. The following data are available regarding the operation. Determine the compliance status. If the large appliance manufacturer is out of compliance, what percent reduction is required to achieve compliance?

<table>
<thead>
<tr>
<th></th>
<th>(A) Electrostatic coating</th>
<th>(B) Manual coating</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transfer efficiency, percent</td>
<td>90</td>
<td>40</td>
</tr>
<tr>
<td>Average volume percent of solids in coating</td>
<td>39</td>
<td>39</td>
</tr>
<tr>
<td>VOC content, lb VOC/gal coating less water</td>
<td>4.5</td>
<td>4.5</td>
</tr>
<tr>
<td>Gallons of coating used per day</td>
<td>30.4</td>
<td>47.1</td>
</tr>
<tr>
<td>Emission limit, lb/gallon less water</td>
<td>2.8</td>
<td>2.8</td>
</tr>
<tr>
<td>Baseline transfer efficiency for large appliances, percent</td>
<td>60</td>
<td>60</td>
</tr>
</tbody>
</table>

The baseline transfer efficiency is 60 percent for a large appliance coater. Table 3 is a tabulation of the available data and calculation results. The actual calculations follow.
<table>
<thead>
<tr>
<th>Spray type</th>
<th>Gallons of coating/day</th>
<th>Solids, vol. %</th>
<th>Lb VOC/gallon coating</th>
<th>Lb VOC/gallon solids</th>
<th>% TE</th>
<th>Lb VOC/gallon solids applied</th>
<th>Gallons of solids applied/day</th>
<th>Pounds of VOC/day</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Actual emissions</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A</td>
<td>30.4</td>
<td>39</td>
<td>4.5</td>
<td>11.5</td>
<td>90</td>
<td>12.8</td>
<td>10.7</td>
<td>136.8</td>
</tr>
<tr>
<td>B</td>
<td>47.1</td>
<td>39</td>
<td>4.5</td>
<td>11.5</td>
<td>40</td>
<td>28.8</td>
<td>7.3</td>
<td>212.0</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>348.8</strong></td>
</tr>
<tr>
<td><strong>Allowed emissions</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A</td>
<td>28.8</td>
<td>62</td>
<td>2.8</td>
<td>4.5</td>
<td>60</td>
<td>7.5</td>
<td>10.7</td>
<td>80.6</td>
</tr>
<tr>
<td>B</td>
<td>19.6</td>
<td>62</td>
<td>2.8</td>
<td>4.5</td>
<td>60</td>
<td>7.5</td>
<td>7.3</td>
<td>54.9</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>135.5</strong></td>
</tr>
</tbody>
</table>
Under the actual emissions category, the following calculations can be made.

For A and B, the mass of VOC per volume of solids is:

\[
\frac{4.5 \text{ lb VOC}}{\text{gal coating}} \times \frac{1 \text{ gal coating}}{0.39 \text{ gal solids}} = 11.5 \text{ lb VOC} \text{ gal solids}
\]

For A, the mass of VOC per volume of solids applied is:

\[
\frac{4.5 \text{ lb VOC}}{\text{gal coating}} \times \frac{1 \text{ gal coating}}{0.39 \text{ gal solids}} \times \frac{1 \text{ gal solids}}{0.90 \text{ gal solids applied}} = 12.82 \text{ lb VOC gal solids applied}
\]

For B, the mass of VOC per volume of solids applied is:

\[
\frac{4.5 \text{ lb VOC}}{\text{gal coating}} \times \frac{1 \text{ gal coating}}{0.39 \text{ gal solids}} \times \frac{1 \text{ gal solids}}{0.40 \text{ gal solids applied}} = 28.85 \text{ lb VOC gal solids applied}
\]

For A, the volume of solids applied per day is:

\[
\frac{30.4 \text{ gal coating}}{\text{day}} \times \frac{0.39 \text{ gal solids}}{\text{gal coating}} \times \frac{0.90 \text{ gal solids applied}}{\text{gal solids used}} = 10.7 \text{ gal solids applied day}
\]

For B, the volume of solids applied per day is:

\[
\frac{47.1 \text{ gal coating}}{\text{day}} \times \frac{0.39 \text{ gal solids}}{\text{gal coating}} \times \frac{0.40 \text{ gal solids applied}}{\text{gal solids used}} = 7.3 \text{ gal solids applied day}
\]

For A, the mass of VOC emissions per day is:

\[
\frac{4.5 \text{ lb VOC}}{\text{gal coating}} \times \frac{30.4 \text{ gal coating}}{\text{day}} = 136.8 \text{ lb VOC day}
\]

For B, the mass of VOC emissions per day is:

\[
\frac{4.5 \text{ lb VOC}}{\text{gal coating}} \times \frac{47.1 \text{ gal coating}}{\text{day}} = 212.0 \text{ lb VOC day}
\]

Under the allowed emissions category, the following calculations can be made.

For A and B, the volume fraction of VOC in the baseline coating is:

\[
\frac{2.8 \text{ lb VOC}}{\text{gal coating}} \times \frac{1 \text{ gal VOC}}{7.36 \text{ lb VOC}} = 0.38 \text{ gal VOC gal coating}
\]

28
The volume fraction solids in the coating is:

\[ 1 - \frac{0.38 \text{ gal VOC}}{\text{gal coating}} = \frac{0.62 \text{ gal solids}}{\text{gal coating}} \]

The baseline mass of VOC per volume solids is:

\[ \frac{2.8 \text{ lb VOC}}{\text{gal coating}} \times \frac{1 \text{ gal coating}}{0.62 \text{ gal solids}} = \frac{4.5 \text{ lb VOC}}{\text{gal solids applied}} \]

For A and B, the maximum allowable emissions are:

\[ \frac{2.8 \text{ lb VOC}}{\text{gal coating}} \times \frac{1 \text{ gal coating}}{0.62 \text{ gal solids}} \times \frac{1 \text{ gal solids used}}{0.60 \text{ gal solids applied}} = \frac{7.5 \text{ lb VOC}}{\text{gal solids applied}} \]

The volume of solids applied remains the same. Therefore, for A, the gallons of complying coating used per day would be:

\[ \frac{10.7 \text{ gal solids applied}}{\text{day}} \times \frac{1 \text{ gal coating}}{0.62 \text{ gal solids}} \times \frac{1 \text{ gal solids used}}{0.6 \text{ gal solids applied}} = \frac{28.8 \text{ gal coating}}{\text{day}} \]

For B, the gallons of complying coating used per day would be:

\[ \frac{7.3 \text{ gal solids}}{\text{day}} \times \frac{1 \text{ gal coating}}{0.62 \text{ gal solids}} \times \frac{1 \text{ gal solids used}}{0.6 \text{ gal solids applied}} = \frac{19.6 \text{ gal coating}}{\text{day}} \]

For A, the mass of VOC emissions allowed per day is:

\[ \frac{2.8 \text{ lb VOC}}{\text{gal coating}} \times \frac{28.8 \text{ gal coating}}{\text{day}} = \frac{80.6 \text{ lb VOC}}{\text{day}} \]

For B, the mass of VOC emissions allowed per day is:

\[ \frac{2.8 \text{ lb VOC}}{\text{gal coating}} \times \frac{19.6 \text{ gal coating}}{\text{day}} = \frac{54.9 \text{ lb VOC}}{\text{day}} \]

The total actual VOC emissions from A and B are 348.8 lb VOC per day. The total allowable VOC emissions are 135.5 lb VOC per day. Therefore, the operation is out of compliance. To achieve compliance, the required reduction in emissions is:

\[ \frac{348.8 - 135.5}{348.8} \times 100 = 61 \text{ percent} \]
SECTION 7
GRAPHS AND TABLES USEFUL IN APPROXIMATING
AND DOUBLE-CHECKING SURFACE COATING CALCULATIONS

Figure 1 can be used to evaluate compliance alternatives for waterborne and organic-borne coatings. This can be done by drawing a horizontal line from the required VOC content of coating (less water and exempt solvents) to the appropriate curve (depending on ratio of water to organic solvent in coating). A vertical line is then drawn from the point of intersection to the x-axis which yields the volume percent solids. All of the coatings represented by the horizontal line have the same pounds of VOC solvent per gallon of coating (less water and exempt solvents). A vertical line in Figure 1 from the volume percent solids to the organic-borne line represents all of the coatings with the same volume percent solids. Horizontal lines drawn from the appropriate waterborne curves yield the VOC contents of the coatings less water and exempt solvents. Note that these values are considerably different for coatings with the same solids contents.

Figures 2 and 3 are the same graph, only Figure 2 is drawn to a larger scale. If the pounds of VOC solvent per gallon of coating (less water and exempt solvents) is known, these figures can be used to approximate the pounds of VOC solvent per gallon of coating solids, assuming a solvent density of 7.36 pounds per gallon.

Table 4 presents volume percent solids equivalency data for different coating operations. Table 5 presents CTG Equivalency Data. A VOC density of 7.36 pounds per gallon is assumed in these tables. Table 6 provides equivalent solids deposited limits. Table 7 presents some useful conversion factors.
Figure 1. Graph for determining equivalent solids/VOC (solvent) contents of waterborne and organic-borne coatings.
Figure 2. Graph for determining pounds of VOC (solvent) per gallon of coating solids.
Figure 3. Smaller-scale graph for determining pounds of VOC (solvent) per gallon of coating solids.
## TABLE 4. CTG VOLUME PERCENT SOLIDS EQUIVALENCY DATA

<table>
<thead>
<tr>
<th>Industrial finishing categories</th>
<th>Kg VOC per liter of coating less water</th>
<th>Lb VOC per gallon of coating less water</th>
<th>Solvent-borne coating equivalent volume % solids</th>
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<td><strong>CAN INDUSTRY</strong></td>
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<td>2.8</td>
<td>62.0</td>
</tr>
<tr>
<td>interior) and over-varnish;</td>
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<td></td>
</tr>
<tr>
<td>two-piece can exterior (basecoat</td>
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<td>4.2</td>
<td>42.9</td>
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<tr>
<td>and over-varnish)</td>
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<td></td>
<td></td>
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<td>0.66</td>
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<td>body spray, two-piece can exteri-</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>or end (spray or roll coat)</td>
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</tr>
<tr>
<td>Three-piece can side-seam spray</td>
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<td></td>
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<td>49.7</td>
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<td>tion, flashoff area and oven</td>
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<td>area and oven</td>
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<th>Solvent-borne coating equivalent volume % solids</th>
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<td>Kg VOC per liter of coating less water</td>
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<th>Kg VOC per liter of coating less water</th>
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<td>1.4</td>
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<td>3.0</td>
<td>0.36</td>
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<td>Kg VOC per liter of coating</td>
<td>Kg VOC per liter of coating</td>
</tr>
<tr>
<td>equivalent volume % solids</td>
<td>Lb VOC per gallon of coating less water</td>
<td>Lb VOC per gallon of coating less water</td>
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<td>62.0</td>
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<td>0.34</td>
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<td>52.4</td>
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<td>59.2</td>
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<td>95.6</td>
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<td>52.4</td>
<td>3.5</td>
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Extreme performance coatings

0.80

0.80
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<th></th>
<th>Lb/gal-H₂O (kg/l)</th>
<th>Volume % Solids</th>
<th>Baseline T.E.</th>
<th>Lb/gal solids deposited (kg/l)</th>
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<td><strong>Auto and Light-duty Truck</strong>*</td>
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<td>Topcoat</td>
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<td>30</td>
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<td>59.2</td>
<td>60</td>
<td>8.4 (1.01)</td>
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<td><strong>Large Appliances</strong></td>
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<td>60</td>
<td>7.5 (0.91)</td>
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*Waterborne equivalence
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<tr>
<th>Metric abbreviation</th>
<th>Metric unit</th>
<th>Equivalent English unit</th>
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<tbody>
<tr>
<td>kg</td>
<td>kilogram (10^3 grams)</td>
<td>2.2046 lb</td>
</tr>
<tr>
<td>liter</td>
<td>liter</td>
<td>0.2642 gal, 0.353 ft^3</td>
</tr>
<tr>
<td>Mg</td>
<td>megagram (10^6 grams)</td>
<td>2,204.6 lb</td>
</tr>
<tr>
<td>MT</td>
<td>metric ton (10^6 grams)</td>
<td>2,204.6 lb</td>
</tr>
<tr>
<td>dscm</td>
<td>dry standard cubic meters</td>
<td>35.31 dry st. ft^3</td>
</tr>
<tr>
<td>scmm</td>
<td>standard cubic meter per min</td>
<td>35.31 ft^3/min</td>
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B. Multiply lb/gal x 0.12 to get kg/liter
C. Multiply kg/liter x 8.34 to get lb/gal

D. Temperature: Degrees Celsius or centigrade (°C) can be converted to degrees Fahrenheit (°F) by the following formula:

$$t^\circ F = 1.8 (t^\circ C) + 32$$
REFERENCES


7. Memorandum entitled "Procedure to Calculate Equivalency with the CTG Recommendations for Surface Coating, from R.G. Rhoads, Director, Control Programs Development Division, to Chief, Air Programs Branch, Regions I-X, dated May 5, 1980.


Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings

NOTICE

THIS EDITION INCLUDES PAGES III-4 AND III-9 AS REVISED JUNE 19, 1986
Procedure for Certifying Quantity of Volatile Organic Compounds Emitted By Paint, Ink, and Other Coatings

Emission Standards and Engineering Division

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Air and Radiation
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

December 1984
This report has been reviewed by the Emission Standards and Engineering Division of the Office of Air Quality Planning and Standards, EPA, and approved for publication. Mention of trade names or commercial products is not intended to constitute endorsement or recommendation for use. Copies of this report are available through the Library Services Office (MD-35), U.S. Environmental Protection Agency, Research Triangle Park, N.C. 27711, or from the National Technical Information Services, 5285 Port Royal Road, Springfield, Virginia 22161.
PREFACE

This manual was conceived as a way to provide simple step-by-step instructions for certifying the quantity of volatile organic compounds (VOC) that will be released by a coating. It has not turned out that way. The guidance is here, but in spite of great diligence, the instructions remain imposing.

The manual was prepared for several reasons. First, the coatings industry, as represented by the National Paint and Coatings Association, had requested a certification procedure which would relieve their customers the expense of analysis. Second, the complexity of the calculations necessary to determine compliance, for example, when dilution solvent is added to a coating, continue to confound Federal, State and Local enforcement personnel. Finally, results of a recent review of the Agency's reference method for determining VOC reemphasized the importance of analytical procedures to verify VOC content.

In response to the results of the review of the test methods, this manual reaffirms that Reference Method 24 or its constituent methods developed by the American Society for Testing and Materials (ASTM), are the procedures by which the VOC content of a coating will be determined for compliance with Federal regulations. The earliest guidance was not so specific. In 1977, the first report, written to assist States in developing regulations for sources of VOC emissions, provided recommendations for the maximum allowable VOC content for complying coatings in a variety of industries. These values were expressed in mass of VOC per unit volume of coating. In deriving the recommended limitation, the VOC content of a coating was calculated based on the solids content provided by the coating manufacturer. The Agency calculated the mass of VOC in the coating by assuming the VOC had a density of 7.36 pounds per gallon.

Solvent and VOC were used somewhat interchangeably even though it was recognized that organics such as resin monomer, oligomers, and reaction by-products could be released by a coating during the cure. There was no accepted analytical method available for measuring the total VOC which would be released by a coating. The initial guidance provided an analytical method for use only for air-dry coatings, those where all VOC emissions would be expected to come as a result of evaporation of solvent. On a volume basis, air-dry coatings constituted the largest category of coatings then in use.

The Agency subsequently developed a more general analytical procedure that could be used to determine the total VOC in a coating. On October 3, 1980, the Agency published "Reference Method 24 (RM-24) -

1Control of Volatile Organic Emissions from Stationary Sources - Volume II: Surface Coating of Cans, Coils, Paper, Fabrics, Automobiles, and Light-duty Trucks, Document No. EPA-450/2-77-099.
Determination of Volatile Matter Content, Density, Volume Solids, and Weight Solids of Surface Coatings." in the Federal Register (45 FR 65958). For the first time the Agency formally specified an analytical method for the VOC content of those coatings that cure by chemical reaction. Even then, the announcement continued to allow the manufacturer's formulation to be used to calculate the VOC content but specified that the analytical technique, RM-24, would be the reference in any conflict between the two.

During 1981 and 1982, as more State and Federal regulations were established, the demand for low-solvent coatings began a continuing increase in the sales volume of reaction-cure coatings. There was some concern voiced by the industry in how appropriate the reference method was for these type coatings. To find out, the Agency began a review of RM-24 to determine the effect of temperature and exposure time on the indicated VOC "content". It was concluded that the maximum effect of those time-temperature combinations that were examined amounted to only about a 10 percent variation. Somewhat more surprising was that the solvent sometimes accounted for only 50 to 70 percent of the total VOC measured by the reference method.

The obvious conclusion was that RM-24 is a better measure of the total organics freed by a coating than is the solvent. This manual implements a policy based on that conclusion. Certification of VOC content on the attached Data Sheets must be based on an analysis using RM-24. No longer will solvent content be permitted as a surrogate for VOC unless a showing is first made that its use is a reasonable alternative or equivalent method of determining the VOC content of that particular coating.

One final comment. Since VOC is not always synonymous with solvent, it follows that the amount of solids in a coating cannot be obtained by subtracting the solvent from the total volume of coating. The original Federal Register proposal for RM-24, published on October 3, 1980, recommended the American Society of Test Materials test Number D2569 as the appropriate method of determining solids content. Subsequent comments from the industry maintained that this test is unreliable. As a result, when promulgated in 1980, RM-24 specified that the solids content of a coating can be obtained only from the manufacturer's formulation of the coating.

Dennis Crumpler
December 14, 1984
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<th>VOC CONTENT OF PAINT, INK AND OTHER COATINGS &quot;AS APPLIED&quot; TO THE SUBSTRATE BY THE USER</th>
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GLOSSARY OF TERMS

"As Applied" the condition of a coating after dilution by the user just prior to application to the substrate.

"As Supplied" the condition of a coating before dilution, as sold and delivered by the coating manufacturer to the user.

\((D_c)_a\) coating density "as applied"

\((D_c)_s\) coating density, "as supplied"

\(D_d\) density of dilution solvent

\(D_w\) density of water (8.33 lb/gal)

\(R_d\) dilution solvent ratio, equals the volume of VOC added per unit volume of coating "as supplied"

\(R_d^+\) equals the volume of premixed water and VOC added per unit volume of coating "as supplied"

\((V_n)_a\) Volume percent solids of coating "as applied"

\((V_n)_s\) Volume percent solids of coating "as supplied"

\((\text{VOC})_a\) VOC content of "as applied" coating, expressed as mass of VOC per unit volume of coating less water or as mass of VOC per unit volume of solids

\((\text{VOC})_s\) VOC content of "as supplied" coating, expressed as mass of VOC per unit volume of coating less water or as mass of VOC per unit volume of solids

\((V_w)_a\) the water content, in volume percent, of coating "as applied"

\((V_w)_d\) the water content, in volume percent, of the dilution solvent added to the "as supplied" coating

\((V_w)_s\) the water content, in volume percent, of the coating "as supplied"

\((W_0)_a\) the organic volatile content, in weight percent, of the coating "as applied"

\((W_0)_s\) the organic volatile content, in weight percent, of the coating "as supplied"
\(W_{va}\) the weight percent of total volatiles in the coating "as applied"

\(W_v\) the weight percent of total volatiles in the coating "as supplied"

\(W_w\) the weight percent water in the coating "as applied"

\(W_w\) the weight percent water in the dilution solvent

\(W_w\) the weight percent water in the coating "as supplied"
APPENDIX A

GLOSSARY OF TERMS USED IN
AIR POLLUTION CONTROL OF EMISSIONS
FROM INDUSTRIAL COATING OPERATION
EPA PUBLICATION NO. 450/3-83-013R, PAGES 26-29
How Much Coating Is Needed to Do a Particular Job?

The same volume of coating solids must be deposited on an object to coat it to a desired film thickness regardless of the type of coating or volatile organic compound content of the coating used. Solids make the film. Volatiles (VOC, water, and non-photochemically reactive solvents) evaporate.

Four gallons of a 25 volume percent (v/o) solids coating must be used to get one gallon of coating solids.

This means that twice as much work can be done with a gallon of 50 v/o solids coating than with a gallon of 25 v/o solids coating. Twice as many gallons of 25 percent solids coating are needed than gallons of 50 percent solids coating to do the same job.

How Do Emissions from Different Coatings Compare?

Comparisons of the percent difference in emissions between two coatings, or between a coating and an emission limit, must be done on a solids basis.

Each gallon of the 25 v/o solids coating contains 5.5 pounds of VOC.

So, for each gallon of coating solids, 22.0 pounds of VOC are emitted.

\[\frac{5.5 \text{ pounds VOC}}{1 \text{ gallon coating}} \times \frac{4 \text{ gallons coating}}{1 \text{ gallon solids}}\]

Each gallon of the 50 v/o solids coating contains 3.7 pounds of VOC.

But, only two gallons of a 50 v/o solids coating must be used to get one gallon of coating solids.
So, for each gallon of coating solids, 7.4 pounds of VOC are emitted.

3.7 pounds VOC x 2 gallons coating
3 gallons solids
4.4 gallons solids

Thus, emissions from the 50 v/o solids coatings are 66 percent less than from the 25 v/o solids coating when providing an equal amount of solids to the process.

\[
\frac{22.0 - 7.4}{22.0} = 0.66
\]

* WHAT EMISSION REDUCTION IS NEEDED TO MEET AN EMISSION LIMIT?

This calculation, which must also be done on a solids basis, is the same as that used above to compare emissions from two different coatings.

A coater who uses a 25 v/o solids coating containing 5.5 pounds of VOC per gallon, less water, must reduce emissions by 66 percent to meet an emission limit of 3.7 pounds of VOC per gallon, less water.

* HOW MUCH DO IMPROVEMENTS IN TRANSFER EFFICIENCY HELP A SOURCE TO COMPETE?

The coater may want to use a coating that does not comply with a regulation and compensate by improvements in the transfer efficiency with which the coating is applied to meet an equivalent emission level. In order to calculate credits for VOC reductions which result from improvements in transfer efficiency, calculations should be done using units of:

\[
\frac{1 \text{ lb VOC}}{\text{gallon solids deposited}}
\]

These units are determined by dividing 1 lb VOC/gallon solids by the transfer efficiency expressed as a decimal fraction. For example, if the starting transfer efficiency is 60 percent, the units would be:

\[
\frac{1 \text{ lb VOC}}{\text{gallon solids deposited}} \times \frac{1 \text{ lb VOC}}{\text{gallon solids deposited}} = \frac{1.0 \text{ gal solids in coating used}}{0.6 \text{ gal solids deposited}}
\]

If both the solvent content of the coating and the transfer efficiency are changed, the situation becomes:

\[
\frac{1 \text{ lb VOC}}{\text{gallon solids deposited}} \times \frac{1 \text{ lb VOC}}{\text{gallon solids deposited}} = \frac{1.0 \text{ gal solids in new coating used}}{1.0 \text{ gal solids in new coating deposited}}
\]

where T = the new transfer efficiency expressed as a decimal fraction.

Expressed in these units, the emissions from the old and new systems can be directly compared to determine the reduction achieved.

NOTE: For metal furniture and appliance coating, the EPA has recommended that credits for transfer efficiency be given from a baseline of 60 percent transfer efficiency (TE). For example, if a company goes from 35 percent TE to 65 percent TE, credit should only be given for going from 60 percent TE to 85 percent TE to avoid rewarding a source that has historically had poor transfer efficiency – hence a high emission rate.

The rationale for this is that 60 percent TE is a reasonable transfer efficiency to achieve for these industries, and credit should only be given for exceeding 60 percent TE.

For the automobile industry, the CTC recommendation for baseline transfer efficiency is 30 percent TE for both primer surfacer and topcoat. This is the efficiency at which waterborne coatings were applied at two existing assembly plants.

APPENDIX B

PROCEDURES FOR CERTIFYING QUANTITY OF VOLATILE ORGANIC COMPOUNDS EMITTED BY PAINT, INK, AND OTHER COATINGS
1. INTRODUCTION

This Manual provides step-by-step instruction for preparation of two data sheets developed by the Environmental Protection Agency which may be used by coating manufacturers and users to present information on the quantity of volatile organic compounds* (VOC) emitted from a coating. One of the data sheets may be prepared by the manufacturer of the coating; the second would be used by the company that applies the coating to a substrate.

The first VOC data sheet, which would be prepared by the manufacturer, provides information on the volatile organic content of a coating as it is delivered to a customer. This is referred to as the VOC content of the coating “as supplied” (by the manufacturer to the user).

The second VOC data sheet, which would be prepared by the user or coater, provides information on the quantity of volatile organic compounds present as the coating is used or applied to the substrate and includes the effect of any dilution solvent added before application. This is referred to as the VOC content of the coating “as applied” (to the substrate).

The coating user may submit, and the Agency enforcing a regulation may accept, these data sheets as prima facie evidence of the actual VOC content of a coating. The referee method for ultimate determination of compliance, however, will continue to be the method specified in the applicable regulation (for example, EPA Reference Method 24 or individual ASTM methods).

---

*Volatil Organic Compound (VOC) – Any organic compound which participates in atmospheric photochemical reactions; that is, any organic compound other than those which the Administrator designates as having negligible photochemical reactivity. VOC may be measured by a reference method, an equivalent method, an alternative method, or by procedures specified under any regulation.
2. VOC CONTENT OF PAINT, INK AND OTHER COATINGS

"AS SUPPLIED" BY THE COATING MANUFACTURER TO THE USER
VOC DATA SHEET:

PROPERTIES OF THE COATING "AS SUPPLIED" BY THE MANUFACTURER

Coating Manufacturer: _______________________________

Coating Identification: ______________________________

Batch Identification: _______________________________

Supplied To: ______________________________________

Properties of the coating as supplied to the customer:

A. Coating Density \(D_C\)_s: _______ lb/gal _______ kg/l
   - [ ] ASTM D1475
   - [ ] Other

B. Total Volatiles \(W_V\)_s: _______ Weight Percent
   - [ ] ASTM D2369
   - [ ] Other

C. Water Content:
   1. \(W_W\)_s _______ Weight Percent
      - [ ] ASTM D3792
      - [ ] ASTM D4017
      - [ ] Other
   2. \(V_W\)_s _______ Volume Percent
      - [ ] Calculated
      - [ ] Other

D. Organic Volatiles \(W_O\)_s: _______ Weight Percent

E. Nonvolatiles Content \(V_n\)_s: _______ Volume Percent

F. VOC Content \(VOC\)_s:
   1. _______ lb/gal coating less water
      or _______ kg/l coating less water
   2. _______ lb/gal solids
      or _______ kg/l solids

Remarks: (use reverse side)

1The subscript "s" denotes each value is for the coating "as supplied" by the manufacturer.

2Explain the other method used under "Remarks".

Signed: ______________________ Date ____________
2.2 IMPLEMENTING INSTRUCTIONS FOR THE VOC DATA SHEET FOR "AS SUPPLIED" COATINGS

This DATA SHEET is normally completed by the coating manufacturer and provided to the user. It will henceforth be referred to as the "AS SUPPLIED" VOC DATA SHEET.

A. The "as supplied" coating density, \((D_s)\)_s, is determined using "ASTM D1475 - Standard Test Method for Density of Paint, Lacquer, and Related Products."

B. The weight percent of total volatiles in a coating, \((W_v)\)_s, is determined by "ASTM U2509 - 81 Standard Method for Volatile Content of Coatings." Drying conditions to be used are 110°C for 1 hour.

C. Water Content

1. The weight percent water, \((W_w)\)_s, is determined by "ASTH D3792 - Standard Test Method for Water Content of Water-Reducible Paints by Direct Injection Into a Gas Chromatograph," or "ASTH U4U17 - Standard Test Method for Water in Paints and Paint Materials by the Karl Fischer Method." An acceptable alternative to these procedures for purposes of preparing the data sheet would be to calculate the weight percent water from the manufacturer's coating formulation.

---


2 The subscript "s" denotes those parameters of a coating when measured in the "as supplied" condition, before dilution by the user.

3 If the manufacturer believes a specified method does not give results that are representative of the actual cure mechanism, he may petition the enforcement authority for approval of an alternate analytical method. Any alternate method or alteration to the methods and procedures in these instructions or in any applicable regulation would be subject to review and approval by the appropriate State and Federal enforcement agency.

4 Volatile compounds classified by EPA as having negligible photochemical reactivity such as 1,1,1-trichloroethane and methylene chloride, etc., and listed as exempt in the applicable Federal and State VOC regulation should be treated in the same manner as water. The weight percent of negligibly reactive compounds in a coating should be determined from the manufacturer's formulation. The volume percent can then be calculated using equation II-1 when the weight percent and density of the negligibly reactive compounds are substituted for those of water. The weight and volume percent can be used in Equations II-2 and II-6, respectively, in place of \((W_w)_s\) and \((W_v)_s\).
2. The water content, in volume percent, \((V_w)_s\), can be calculated by the equation:

\[
(V_w)_s = \frac{(W_w)_s(D_w)}{D_w}
\]

where \(D_w\) is the density of water, 8.33 lbs/gal.

D. The organic volatiles content, \((W_o)_s\), f.e., the VOC content expressed as a percent by weight, is determined by the following equation:

\[
(W_o)_s = (W_v)_s - (V_w)_s
\]

If the coating contains no water the weight percent of organic volatiles is equal to the weight percent of total volatiles.

In other words:

\[(V_w)_s = 0 \text{ and } (W_o)_s = (W_v)_s\]

E. The volume percent solids (nonvolatiles), \((V_n)_s\), should be derived from the coating formulation using the following equation:

\[
(V_n)_s = \sum_{i=1}^{p} (V_n)_{s_i}
\]

where \((V_n)_{s_i}\) denotes the volume percent of each nonvolatile component in an "as supplied" coating, and "p" is the number of nonvolatile components in that coating. (Also see Footnote 1, Pg. II-3.)

---

Footnote 1: The precision limit adjustments permitted by Reference Method 24 for experimentally determined mean \(W_w\) and \(W_v\) values may be made only by enforcement agencies for determination of compliance. The adjustment is not to be used for the purposes of completing the "AS SUPPLIED" VOC DATA SHEET.
F. The VOC content of the "as supplied" coating \((\text{VOC})_s\) can now be calculated and thereby expressed in terms used by most State or Federal regulations.

1. The mass of VOC per unit volume of coating less water:

   a. If the coating contains no water, the equation is calculated as follows:

   \[
   (\text{VOC})_s = \frac{(W_o)_s (D_c)_s}{100s}
   \]

   II-5

   b. If the coating contains water, Equation II-5 becomes:

   \[
   (\text{VOC})_s = \frac{(W_o)_s (D_c)_s}{100s - (V_w)_s}
   \]

   II-6

2. The VOC content may also be calculated in terms of mass of VOC per unit volume of solids (nonvolatiles). For both solvent-borne and waterborne coatings, the equation is:

   \[
   (\text{VOC})_s = \frac{(W_o)_s (D_c)_s}{(V_n)_s}
   \]

   II-7
3. VOC CONTENT OF PAINT, INK AND OTHER COATINGS

"AS APPLIED" TO THE SUBSTRATE BY THE USER
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

VOC DATA SHEET:

PROPERTIES OF THE COATING "AS APPLIED" TO THE SUBSTRATE

Coating Manufacturer:__________________________________________________________

Coating Identification:________________________________________________________

Batch Identification:__________________________________________________________

User:....................................................................................................................

User's Coating Identification:__________________________________________________

Properties of the coating as applied¹ by the User:

A. Coating Density ($D_c$)ₐ: ___________ kg/l, or __________ lb/gal
   ☐ ASTM D1475  ☐ Other²

B. Total Volatiles ($W_v$)ₐ: _________________________________ Weight Percent
   ☐ ASTM D2369  ☐ Other²

C. Water Content: 1. ($W_w$)ₐ _________________________________ Weight Percent
   ☐ ASTM D3792  ☐ ASTM D4017  ☐ Other²
   2. ($V_w$)ₐ _________________________________ Volume Percent
      ☐ Calculated  ☐ Other²

D. Weighted Average Density of the dilution solvent ($D_d$)³: __________ lb/gal
   ☐ ASTM D1475  ☐ Handbook  ☐ Formulation

(Continued on Reverse Side)

¹The subscript "a" denotes each value is for the coating "as applied" to the substrate.
²Explain the other method used under "Remarks" on reverse side
³The subscript "d" denotes values are for the dilution solvent
E. Dilution Solvent Ratio ($R_d$):

\[
\frac{\text{gal diluent}}{\text{(gal coating)}}^4 \quad \text{or} \quad \frac{\text{liter diluent}}{\text{(liter coating)}}^4
\]

F. Organic Volatiles Content ($W_o$):

\[
\text{Weight Percent}
\]

G. Non-Volatiles Content ($V_n$):

\[
\text{Volume Percent}
\]

H. VOC Content ($\text{VOC}_o$):

1. \[
\text{lb/gal of coating less water}
\]

\[
\text{or} \quad \frac{\text{kg/l of coating less water}}{}
\]

2. \[
\text{lb/gal solids}
\]

\[
\text{or} \quad \frac{\text{kg/l solids}}{}
\]

REMARKS:

Signed: ______________________ Date: ________

\[4\text{The subscript "s" denotes values are for the coating "as supplied" by the manufacturer.}\]

\[5\text{This terminology is used to be consistent with Method 24. It refers to all photochemically reactive organic compounds emitted from the coating including reactive by-products of the cure reaction, exactly the same matter as indicated in Paragraph H, i.e., volatile organic compounds, or VOC.}\]
3.2. IMPLEMENTING INSTRUCTIONS FOR THE VOC DATA SHEET FOR "AS APPLIED" COATINGS

This DATA SHEET, henceforth referred to as the "AS APPLIED" VOC DATA SHEET, is to be completed by the company which applies a coating. It provides information on the amount of volatile organic compounds (VOC) in the coating "as applied" to the substrate by accounting for the quantity of diluent solvent added to the "as supplied" coating prior to application. If a coating is diluted only with water or a solvent of negligible photo-chemical reactivity, the user merely documents the fact (see Step E.1. and also Footnote 4, Pg. III-5.). Otherwise, several avenues exist for the coater to certify the VOC content:

(1) Maintain adequate records of how much organic solvent is added to each coating and use that information and the "AS SUPPLIED" VOC DATA SHEET to calculate the VOC content "as applied." In this case begin with Step D. If the "AS SUPPLIED" DATA SHEET is available, but dilution records are not, begin the "As Applied" determination with Step A, skip Steps B and C, and proceed to Step D.
(The user may choose to analyze an "As Supplied" coating using Reference Method 24 and complete the "AS SUPPLIED" VOC DATA SHEET rather than have the coating manufacturer complete it. The volume percent solids, however, will necessarily continue to be supplied by the coating manufacturer.)
(3) Analyze each diluted coating with the same method used to generate the data provided by the coating manufacturer on the "AS SUPPLIED" VOC DATA SHEET. (See Chapter 2 of this Manual.) In this case begin with Step A.

A. The "as applied" coating density, \( D_{as} \), is determined using "ASTM D1475-Standard Test Method for Density of Paint, Lacquer, and Related Products."

B. The weight percent of total volatiles in the coating, \( W_{v} \), is determined by "ASTM D2369-81 Standard Method for Volatile Content of Coatings." The drying conditions to be used are 110°C for 1 hour.


2The subscript "a" denotes those parameters of a coating in the "as applied" condition, i.e., after dilution by the user. The subscript "s" denotes the parameters of a coating in the "as supplied" condition, before dilution by the user.

3If the manufacturer believes the specified method gives results that are not representative of the VOC released during the normal cure, he may petition the enforcement authority for approval of an alternative analytical method. Any alternate method or alteration to the methods and procedures in these instructions or in any applicable regulation would be subject to review and approval by the appropriate State and/or Federal enforcement agency.

III-4
C. The water content is necessary only if the coating has been diluted with a mixture of organic solvent and water.\textsuperscript{4,5} If the dilution solvent is 100 percent organic, or if the weight and volume percent water in the mixture is known, proceed directly to Step D.

The weight percent water, \((W_w)_a\), is determined by "ASTM U3792 - Standard Test Method for Water Content of Water-Reducible Paints by Direct Injection Into a Gas Chromatograph," or "ASTM D4017 - Standard Test Method for Water in Paints and Paint Materials by the Karl Fischer Method." (Also see Footnote 3, Pg. III-4.)

The water content, in volume percent, \((V_w)_a\), can be calculated by the equation:

\[
(V_w)_a = \frac{(W_w)_a (D_c)_a}{\rho_w}
\]

where \(\rho_w\) is the density of water, 8.33 lb/gal.

\textsuperscript{4}Volatiles compounds classified by EPA as having negligible photochemical reactivity such as 1,1,1-trichloroethane and methylene chloride, etc., and listed as exempt in the applicable Federal and State VUC regulation, should be treated in the same manner as water. The weight percent of negligibly reactive compounds in the dilution solvent must be known either from the coater's mixing records or the dilution solvent supplier's formulation. The volume percent can then be calculated using Equations III-1 or III-5 when the weight percent and density of the negligibly reactive organics are substituted for those of water. The weight and volume percent of the negligibly reactive compounds can be substituted in all equations where the weight and volume percent water, \((W_w)\) and \((V_w)\), respectively, are used.

\textsuperscript{5}The precision limit adjustments permitted by Reference Method 24 for experimentally determined mean weight percent water and total volatiles, \(W_w\) and \(V_w\) respectively, may be made only by enforcement agencies for determination of compliance. The adjustment is not to be used for the purposes of completing the "AS APPLIED" VOC REPORT.
D. If the dilution solvent consists of a single compound the density may be obtained from the literature.

If the dilution solvent is a mixture of organic compounds, the density, $D_d^0$, can be determined analytically via ASTM U1475, or an average density can be estimated from the solvent formulation as shown below. This estimation assumes that volumes are additive.

$$D_d = \frac{100\%}{\sum_{j=1}^{m} W_j \frac{D_j}{100\%}}$$  \hspace{1cm} \text{III-2}$$

or

$$= \frac{1}{\sum_{j=1}^{m} V_j}$$  \hspace{1cm} \text{III-3}$$

where: $D_j$, $W_j$, and $V_j$ denote the density, weight percent, and volume percent of each solvent in the dilution solvent mixture and "m" is the number of organic solvents in the dilution solvent mixture.

If the dilution solvent is a mixture of photochemically reactive organics and water, the coater must know the weight percent, $(W_w)d$, or volume percent, $(V_w)d$, of water from his mixing records or the supplier's formulation, or he must analytically determine the weight fraction of water in the dilution solvent using ASTM D3792 or ASTM D4017. The density, $D_d$, of the dilution solvent may then be determined by analytically measuring the density of the organic solvent/water mixture, $D_d^+$, using ASTM U1475 and adjusting it for the water content using the following equation. (See also Footnote 4, Pg. III-5.)

$$D_d = D_d^+ \left[ \frac{100\% - (W_w)d}{100\% - (V_w)d} \right]$$  \hspace{1cm} \text{III-4}$$

Note: If either the weight or volume percent water in the dilution solvent is known, the other can be calculated by the equation:

$$(V_w)d = \frac{(W_w)d D_d^+}{D_w}$$  \hspace{1cm} \text{III-5}$$

where "$D_w$" is the density of water.

The subscript "d" denotes a parameter that pertains to that solvent used by the coater to dilute the "as supplied" coating.
E. The dilution solvent ratio, $R_d$, is defined as the volume of photochemically reactive organic solvent, (VOC), added per unit volume of "as supplied" coating. Stated mathematically,

$$R_d = \frac{\text{Volume photochemically reactive dilution solvent added}}{\text{Volume of "as supplied" coating}}$$

1. If the "as supplied" coating is subsequently diluted with water or a solvent which is of negligible photochemical reactivity, the VOC content will be unchanged from that reported on the "AS SUPPLIED" VOC DATA SHEET. This should be reported on the "AS APPLIED" VOC DATA SHEET by entering "0" for the dilution solvent ratio, $R_d$.

2. In the absence of adequate dilution records, $R_d$ can be calculated from entries on the VOC DATA SHEETS by one of the following equations:

   a. When the dilution solvent consists only of VOC,

   $$R_d = \left( \frac{D_c}{D_s} \right) - \left( \frac{D_c}{D_d} \right)$$

   b. When the dilution solvent is a mixture of water and photochemically reactive organic solvent, Equation 11III-6 may be expressed as:

   $$R_d = \left( \frac{D_c}{D_s} \right) - \left( \frac{D_c}{D_d} \right)$$

   where: $k_d$ is the ratio of the volume of water and organic dilution solvent to the volume of "as supplied" coating to which it is added. (Also see Footnote 4, Pg. 11III-5.)

The dilution solvent ratio, $R_d$, may now be calculated from $R_d$ by the following equation:

$$R_d = \frac{1}{R_d} \left[ 1 - \left( \frac{V_d}{V_s} \right) \right]$$

III-7
F. The organic volatile content ($W_0$)\(_a\), i.e. the VOC content expressed as a percent by weight of the diluted coating, can now be calculated by either of two ways:

1. From analyses of the coating using the following equation:

$$W_0a = W_va - Wwa$$  \(\text{III-9}\)

(See Footnotes 4 and 5, Pg. III-5.)

If the coating does not contain water, the weight percent of organic volatiles is equal to the weight percent of total volatiles, or

$$W_0a = Wva$$  \(\text{III-10}\)

2. By using the data from the "AS SUPPLIED" VOC DATA SHEET, the dilution solvent ratio, and the density of the dilution solvent with the following equation:

$$W_0a = \left(\frac{\left(D_c\right)_s (W_0)_s/100\%}{(D_c)_s + (R_d\mu_d)}\right) \times 100\%$$  \(\text{III-11}\)

G. The volume percent solids, or nonvolatiles, $(V_n)_a$, must be calculated from the following equation where $(V_n)_s$ is obtained from the "AS SUPPLIED" VOC DATA SHEET.

$$V_na = \frac{(V_n)_s}{1 + R_d}$$  \(\text{III-12}\)

H. The VOC content of the "as applied" coating $(VOC)_a$, can now be calculated and thereby expressed in terms used in most State or Federal regulations.

1. The mass of VOC per unit volume of coating, less water, is calculated in either of two ways.

a. Using the results obtained by analyzing the coating with EPA Reference Method 24 or its constituent ASTM Methods:

(1). If the coating contains no water the equation is:

$$VOC_a = \frac{W_0a (D_c)_a}{100\%}$$  \(\text{III-13}\)
(2). If the coating contains water the following equation must be used:

\[
(\text{VOC})_a = \frac{(W_o)\alpha (D_c)\alpha}{100\% - (V_w)\alpha}
\]

b. Using the VOC content of the "as supplied" coating, \((\text{VOC}_s)\), the dilution solvent ratio, and the density of the solvent, the equation is:

\[
(\text{VOC})_a = \frac{[(\text{VOC})_s (100\% - (V_w)_s)/100\%] + (R_d D_d)}{1 + R_d - (V_w)_s/100\%}
\]

Where \((\text{VOC})_s\) in this case must be in units of lbs VOC/gal coating less water.

The VOC content may also be calculated in terms of mass of VOC per unit volume of solids (nonvolatiles).

a. Using the results obtained by analyzing the coating with EPA Reference Method 24 or its constituent ASTM methods, the equation for both solvent-borne and waterborne coatings, is:

\[
(\text{VOC})_a = \frac{(W_o)\alpha (D_c)\alpha}{(V_n)\alpha}
\]

b. Using dilution information and calculation procedures only, the equation is:

\[
(\text{VOC})_a = \frac{[(\text{VOC})_s (100\% - (V_w)_s)/100\%] + (R_d D_d)}{(V_n)_s/100\%}
\]

Where \((\text{VOC})_s\) in this case must be in units of lbs VOC/gal coating less water.
This manual provides procedures by which firms may voluntarily certify the quantity of volatile organic compounds which will be emitted by a paint, ink, or other coating. Two data sheets are provided. One is to be used by the manufacturer of the coating, the other by the user. Analytical test methods and procedures for preparing the data sheets are included, as are the equations and instructions necessary to convert the analytical results into a format suitable for determining compliance with State or Federal regulations.
Title 40—Protection of Environment

Pt. 60, App. A, Meth. 24

METHOD 24—DETERMINATION OF VOLATILE MATTER CONTENT, WATER CONTENT, DENSITY, VOLATILE SOLIDS, AND WATER SOLIDS OF SURFACE COATINGS

1. Applicability and Principle

1.1 Applicability. This method applies to the determination of volatile matter content, water content, density, volume solids, and weight solids of paint, varnish, lacquer, or related surface coatings.

1.2 Principle. Standard methods are used to determine the volatile matter content, water content, density, volume solids, and weight solids of the paint, varnish, lacquer, or related surface coatings.

2. Applicable Standard Methods

Use the apparatus, reagents, and procedures specified in the standard methods below:


2.2 ASTM D1569-51, Standard Test Method for Volatile Content of Coatings (incorporated by reference—see § 60.17).

2.3 ASTM D3783-79, Standard Test Method for Water Content of Water-Reducible Paints by Direct Injection into a Gas Chromatograph (incorporated by reference—see § 60.17).

2.4 ASTM D4017-81, Standard Test Method for Water in Paints and Paint Materials by the Karl Fischer Titration Method (incorporated by reference—see § 60.17).

3. Procedure

3.1 Volatile Matter Content. Use the procedure in ASTM D2366-81 (incorporated by reference—see § 60.17) to determine the volatile matter content (may include water) of the coating. Record the following information:

W = Weight of dish and sample before heating, g.

W' = Weight of dish and sample after heating, g.

W = Sample weight, g.

Run analyses in pairs (duplicate sets) for each coating until the criterion in section 4.3 is met. Calculate the weight fraction of the volatile matter (W) for each analysis as follows:

\[ \frac{W' - W}{W} \]  

(Col. 24-1)

Record the arithmetic average (\( \bar{W} \)).

3.2 Water Content. For waterborne (water reducible) coatings only, determine the weight fraction of water (W) using either "Standard Content Method Test for Water of Water-Reducible Paints by Direct Injection into a Gas Chromatograph" or "Standard Test Method for Water in Paint and Paint Materials by Karl Fischer Method." These two methods are incorporated by reference—see § 60.17.1. A waterborne coating is any coating which contains more than 5 percent water by weight in its volatile fraction. Run duplicate sets of determinations until the criterion in section 4.3 is met. Record the arithmetic average (\( \bar{W} \)).

3.3 Coating Density. Determine the density (\( \rho \), kg/m³) of the surface coating using the procedure in ASTM D1475-60 (Reapproved 1980) (incorporated by reference—see § 60.17).

Run duplicate sets of determinations for each coating until the criterion in section 4.3 is met. Record the arithmetic average (\( \bar{\rho} \)).

3.4 Solids Content. Determine the volume fraction (V) solids of the coating by calculation using the manufacturer's formulation.

4. Data Validation Procedure

4.1 Summary. The variety of coatings that may be subject to analysis makes it necessary to verify the ability of the analyst and the analytical procedures to obtain reproducible results for the coatings tested. This is done by running duplicate analyses on each sample tested and ensuring results with the within-laboratory precision statements for each parameter. Because of the inherent increased imprecision in the determination of the VOC content of waterborne coatings as the percent water increases, measured parameters for waterborne coatings are modified by the appropriate confidence limits based on the laboratory precision statement.

4.2 Analytical Precision Statements. The within-laboratory and between-laboratory precision statements are given below:

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Within-laboratory</th>
<th>Between-laboratory</th>
</tr>
</thead>
<tbody>
<tr>
<td>Volatile matter content</td>
<td>1.5 % ( \bar{W} )</td>
<td>4.7 % ( \bar{W} )</td>
</tr>
<tr>
<td>Water content</td>
<td>2.9 % ( \bar{W} )</td>
<td>7.5 % ( \bar{W} )</td>
</tr>
<tr>
<td>Density, ( \rho )</td>
<td>6.891 \text{kg/m}^3</td>
<td>6.993 \text{kg/m}^3</td>
</tr>
</tbody>
</table>

4.3 Sample Analysis Criteria. For \( \bar{W} \) and \( \bar{\rho} \), run duplicate analyses until the difference between the two values in a set is less than or equal to the within-laboratory precision statement for that parameter. For \( \bar{\rho} \), run duplicate analyses until each value in a set deviates from the mean of the set by more than the within-laboratory precision statement. If after analysis it is concluded that the ASTM procedure...
cannot be used for the specific coating with the established within-laboratory precision, the Administrator will assume responsibility for providing the necessary procedures for revising the method or precision statements upon written request to: Director, Emission Standards and Engineering Division, (MD-13) Office of Air Quality Planning and Standards, U.S. Environmental Protection Agency, Research Triangle Park, North Carolina 27711.

4.4 Confidence Limit Calculations for Waterborne Coatings. Based on the between-laboratory precision statements, calculate the confidence limits for waterborne coatings as follows:

To calculate the lower confidence limit, subtract the appropriate between-laboratory precision value from the measured mean value for that parameter. To calculate the upper confidence limit, add the appropriate between-laboratory precision value to the measured mean value for that parameter.

For W, and D, use the lower confidence limits, and for V, use the upper confidence limit. Because V is calculated, there is no adjustment for the parameter.

5. Calculations

5.1 Nonaqueous Volatile Matter.

5.1.1 Solvent-borne Coatings.

\[ W - W \text{ Eq. 24-3} \]

Where:

W = Weight fraction nonaqueous volatile matter.

W = Waterborne Coatings.

W = Weight fraction solids.

W = Weight solids, lb.

METHOD 24A—DETERMINATION OF VOLATILE MATERN COATINGS AND DENSITY OF PRINTING INKS AND RELATED COATINGS

1. Applicability and Principle.

1.1 Applicability. This method applies to the determination of the volatile organic compound (VOC) content and density of solvent-borne (solvent reducible) printing inks or related coatings.

1.2 Procedure. Separate procedures are used to determine the VOC weight fraction and density of the coating and the density of the solvent in the coating. The VOC weight fraction is determined by measuring the weight loss on a known sample quantity which has been heated for a specified length of time at a specified temperature. The density of both the coating and solvent are measured by a standard procedure.

From this information, the VOC volume fraction is calculated.

2. Procedure

2.1 Weight Fraction VOC.

2.1.1 Apparatus.

2.1.1.1 Weighing Dishes. Aluminum foil, 34 mm in diameter by 18 mm high, with a flat bottom. There must be at least three weighing dishes per sample.

2.1.1.2 Disposable syringes, 5 ml.

2.1.1.3 Analytical Balance. To measure to within 0.1 mg.

2.1.1.4 Oven. Vacuum oven capable of maintaining a temperature of 120 ±2°F and an absolute pressure of 516 ±0.1 mm Hg for 4 hours. Alternatively, a forced draft oven capable of maintaining a temperature of 120 ±2°F for 34 hours.

2.1.1.5 Analyzer. Shake or mix the sample thoroughly to assure that all the solids are completely suspended. Label and weigh to the nearest 0.1 mg a weighing dish and record this weight (W1).

Using a 5-ml syringe without a needle remove a sample of the coating. Weigh the syringe and sample to the nearest 0.1 mg and record this weight (W2). Transfer 1 to 3 g of the sample to the tared weighing dish. Reweight the syringe and sample to the nearest 0.1 mg and record this weight (W3). Heat the weighing dish and sample in a vacuum oven at an absolute pressure of 516 ±0.1 mm Hg and a temperature of 120 ±2°F for 4 hours. Alternatively, heat the weighing dish and sample in a forced draft oven at a temperature of 120 ±2°F for 34 hours. After the weighing dish has cooled, reweigh it to the nearest 0.1 mg and record the weight (W4). Repeat this procedure for a total of three determinations for each sample.

2.2 Density. Determine the density of the ink or related coating according to the procedure outlined in ASTM D 1475-66 (Reapproved 1980), which is incorporated by reference. It is available from the American Society for Testing and Materials, 1916 Race Street, Philadelphia, Pennsylvania 19103. It is also available for inspection at the Office of the Federal Register, Room 8401, 1100 L Street, NW, Washington, D.C. This incorporation by reference was approved by the Director of the Federal Register on November 5, 1963. This material is incorporated as it stands on the date of approval and a notice of any change in these materials will be published in the Federal Register.

2.3 Solvent Density. Determine the density of the solvent according to the procedure outlined in ASTM D 1475-66 (Reapproved 1980). Make at least three determinations for each coating. Report the density D, as the arithmetic average of the three determinations.

3. Calculations

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3.1 Weight Fraction VOC. Calculate the weight fraction volatile organic content \( W_w \) using the following equation:

\[
W_w = \frac{M_{e} + M_{ct} - M_{ct} - M_{e}}{M_{ct} - M_{e}}
\]

(Eq. 24A-1)

Report the weight fraction VOC \( W_w \) as the arithmetic average of the three determinations.

3.2 Volume Fraction VOC. Calculate the volume fraction volatile organic content \( V_v \) using the following equation:

\[
V_v = \frac{W_w \cdot D_s}{D_s}
\]

(Eq. 24A-2)


A Guideline for Surface Coating Calculations

PEI Associates, Inc.

The calculation of volatile organic compound emissions from surface coating operations to determine compliance is often a complicated task, sometimes creating confusion with compliance authorities and sources alike. In an attempt to minimize this confusion, EPA (DAQPS) has periodically issued guidance in this area, generally in the form of memoranda to the EPA Regional Offices. The most recent document is entitled "Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink and Other Coatings," published December 1984, EPA 450/3-84-019.

"A Guideline for Surface Coating Calculations" takes the above guidance process one step further for surface coating operations. Guidance is provided on how to compute existing and allowed emissions based on the above document as well as previously issued Control Technique Guidelines for the individual categories. Example calculations are included for basic emission problems, compliance determinations, equivalency determinations, application of transfer efficiency, and calculations involving complex multiproduct plants. The appropriate data sheets, a list of various equations and notations, and graphs and tables useful in making the above calculations are also included.

Air Pollution Control
Organic Chemicals
Coating Operations

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