

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
DIVISION OF AIR RESOURCES

IN RE:

Guild Music
Division of U.S. Music Corporation
60 Industrial Drive
Westerly, RI 02891

In Reference to A.H. File No. 95-65-AP

CONSENT AGREEMENT

This Consent Agreement is entered by and between the Department of Environmental Management, Division of Air Resources (hereinafter "the Division") and Guild Music, Division of U.S. Music Corporation, 60 Industrial Drive, Westerly, RI 02891 (hereinafter "Guild") pursuant to the Rhode Island Clean Air Act, Chapter 23-23 of the General Laws of the State of Rhode Island and Providence Plantations, as amended, the Air Pollution Control Regulations adopted in accordance therewith, and the Department of Environmental Management Act, R.I.G.L. 42-17.1-2 et seq., and constitutes an alternative "Reasonably Available Control Technology" ("RACT") determination pursuant to Subsection 19.3.3 of Air Pollution Control Regulation No. 19, last amended 19 November 1992.

Guild is regulated under Air Pollution Control Regulation No. 19, entitled "Control of Volatile Organic Compounds from Surface Coating Operations". In order to assure that Guild complies and/or continues to comply with the provisions of Air Pollution Control Regulation No. 19, the Division and Guild hereby agree as follows:

1. That the Division has jurisdiction over the subject matter of this Consent Agreement and over the parties consenting to this Consent Agreement.
2. That Guild is subject to the provisions of Title 23, Chapter 23 of the Rhode Island General Laws, as amended, and the Air Pollution Control Regulations adopted in accordance therewith.
3. That the provisions of this Consent Agreement shall apply to and be binding upon Guild and U.S. Music Corporation, its officers, directors, agents, servants, employees, operators, successors, and assignees and all persons, firms, and corporations acting under, through, and for it.
4. That Guild is engaged in the production of handmade guitars for the music industry at its facility located at 60 Industrial Drive, Westerly, RI. In the production of guitars, Guild utilizes four (4) manual spray booths to apply various coatings and stains to guitars on one of two product lines: satin finish and gloss finish guitars. Volatile Organic Compounds (VOC's) are emitted from the coatings and stains as they are applied.
5. That Guild submitted an Initial Compliance Plan to the Division in June of 1994. The Initial Compliance Plan indicated that Guild had chosen to satisfy the requirements of Regulation No. 19 through reformulation to complying coatings.
6. That, subsequent to the submittal of the initial compliance plan, Guild has

submitted economic and technical documentation to the satisfaction of the Division that the emission limitations set forth in Subsection 19.3.1 cannot be feasibly met.

7. That Guild has submitted economic and technical documentation to the satisfaction of the Division that installation of a control system is not feasible.
8. That Guild is currently and actively investigating and testing various alternative coatings and stains to the ones currently in use at Guild.
9. That Guild shall achieve emission limitations different from those of Subsection 19.3.1 that will represent an alternative Reasonably Available Control Technology as follows:

Category	Emission Limitation in Regulation No. 19 (lbs VOC/gallon of coating minus water)	Alternative Emission Limitation for Guild (lbs VOC/gallon of coating minus water)
Clear Topcoat	2.3	5.91
Washcoat	1.0	6.27
Semitransparent spray stains and toners	1.0	6.31
Opaque ground coats & enamels	5.5	6.09
Filler	2.3	2.56
Stripper	2.9	6.59

10. That, for the satin finish line, Guild has replaced 7 coats of high gloss (5.88 lbs VOC/gallon of coating minus water) and 1 coat of satin finish (5.66 lbs VOC/gallon of coating minus water) with 2 coats of hand-rub wax (3.69 lbs VOC/gallon of coating minus water) for finishing each guitar.

11. That Guild will comply with the following work practice standards to reduce VOC emissions from coating operations, cleaning operations and washoff operations:

A. Work practice implementation plan.

Prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for each guitar manufacturing operation and addresses each of the topics specified in paragraphs (B) through (J) of this section. The plan shall be developed no more than 60 days after the date of execution of this consent agreement. The written work practice implementation plan shall be available for inspection by the Division, upon request. If the Division determines that the work practice implementation plan does not adequately address each of the topics specified in paragraphs (B) through (J) of this section, the Division may require Guild to modify the plan.

B. Operator training course.

Train all new and existing personnel, including contract personnel, who are involved in finishing or cleaning operations or implementation of the requirements of this rule. All personnel shall be given refresher training annually. Maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:

1. A list of all personnel by name and job description that are required to be trained;
2. An outline of the subjects to be covered in the initial and refresher training for each person, or group of personnel;

3. Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and
4. A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.

C. Leak inspection and maintenance plan.

Prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies the following:

1. A minimum visual inspection frequency of once per month for all equipment used to transfer or apply finishing materials or organic solvents;
2. An inspection schedule;
3. Methods for documenting the date and results of each inspection and any repairs that were made;
4. The timeframe between identifying a leak and making the repair, which adheres to the following schedule:
 - a. A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five (5) working days after the leak is detected; and
 - b. Final repairs shall be made within fifteen (15) working days unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three (3) months

D. Cleaning solvent accounting system.

Develop an organic solvent accounting form to record the following:

1. The quantity and type of organic solvent used each month for washoff and cleaning;
 2. The number of pieces washed off, and the reason for the washoff; and
 3. The quantity of spent organic solvent generated from each activity, and the quantity that is recycled onsite or disposed offsite each month.
- E. Guild shall not use organic solvent containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, and/or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is, the spray booth coating or other material used to cover the booth is being replaced, the affected source shall use no more than 1.0 gallon of organic solvent to clean the booth.
- F. Guild shall use normally closed containers for storing finishing and cleaning materials.
- G. Guild shall not use conventional air spray guns for applying finishing materials except under the following circumstances:
1. To apply finishing materials that have a VOC content no greater than 1.0 kg VOC/kg solids (1.0 lb VOC/lb solids), as applied;
 2. For touch-up and repair under the following circumstances:
 - a. The finishing materials are applied after completion of finishing operation; or
 - b. The finishing materials are applied after the stain and before any other type of finishing material is applied, and the finishing materials are applied from a container that has a volume of no more than two (2) gallons.
 3. If spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;
 4. If emissions from the finishing application station are directed to a control device;

5. The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is less than five (5) percent of the total gallons of finishing material used during that semiannual reporting period; or
6. The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology. Guild shall demonstrate technical or economic infeasibility by submitting to the Division a videotape, a technical report, or other documentation that supports Guild's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support Guild's claim of technical or economic infeasibility:
 - a. The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or
 - b. The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.
- H. Guild shall pump or drain all organic solvent used for line cleaning into a normally closed container.
- I. Guild shall collect all organic solvent used to clean spray guns into a normally closed container.
- J. Guild shall control emissions from washoff operations by:
 1. Using normally closed tanks for washoff; and
 2. Minimizing dripping by tilting or rotating the parts to drain as much organic solvent as possible.
12. That Guild will submit to the Division on or before each March 31, June 30, September 30 and December 31 of each year for five years after the date of final approval of this consent agreement an update of progress toward achieving the

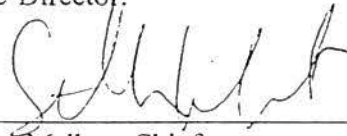
emission limitations contained in Subsection 19.3.1. This submittal will include but not be limited to the information contained on the Guild Music, Westerly, Rhode Island, Quarterly Update located in Appendix A.

13. That Guild shall reevaluate VOC emissions from the facility and shall undergo RACT review five years after the date of final approval of this consent agreement and every three years thereafter in accordance with Subsection 19.3.3 (d) until the emission limitations specified in Subsection 19.3.1 are achieved.
14. That Guild shall comply with the continuous record keeping requirements for VOC use set forth in Section 19.2.5. These records shall be maintained for a period of five years and shall be available for inspection by the Division and the United States Environmental Protection Agency upon request for the purpose of determining compliance with this Consent Agreement. These records shall include the following:
 - (A) The name, identification number and amount used each month of each coating, as applied, on each coating line or operation;
 - (B) The mass of VOC per volume (excluding water), as applied, for each coating used on each coating line or operation;
 - (C) The type and amount of solvent used for diluents and cleanup operations.
15. That it is agreed and understood by the parties that the implementation of the

requirements of this Consent Agreement does not relieve Guild from compliance with any and all other requirements of the Rhode Island Clean Air Act and applicable Air Pollution Control Regulations or with any applicable Air Pollution Control Regulations that become effective and/or amended subsequent to the execution of this Consent Agreement.

Consented to in Substance and in Form:

State of Rhode Island and Providence Plantations
Department of Environmental Management
For the Director:

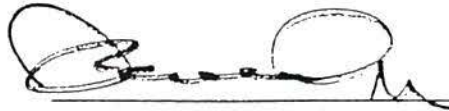


Stephen Majkut, Chief
Division of Air Resources

9 NOV 95
Date

Guild, Division of U.S. Music Corporation hereby agrees to the above Consent Agreement, which becomes effective immediately upon being entered and issued.

Authorized Representative:



Darrell C. Orr, President
U.S. Music Corporation

11/8/95
Date

GUILD MUSIC
DIVISION OF US MUSIC CORPORATION
WESTERLY, RHODE ISLAND

QUARTERLY UPDATE

Update for quarter ending: _____, 19__

Person completing this form: _____

Date of submission _____/_____/_____

This form is being submitted to the RI-DEM in order to update the agency on the progress of Guild Music's compliance efforts with respect to the RI VOC RACT. It contains information on the reformulated coatings tested by Guild, including laboratory/performance and market testing results, along with any other pertinent information on Guild's progress.

Reformulated Coatings Tested:

Reformulated Coating
(Name, I.D. No., & VOC content)

Existing Coating to be replaced
Name, I.D. No., & VOC content)

Describe any laboratory/performance testing results:

Describe any market testing results:

Additional comments/information:

Signature of Person
Completing this Form

Date