AFS# 44100700501

II

SIMS METAL MANAGEMENT

242 Allens Avenue
Providence, RI 02905

Telephone 401 752 2000
Facsimile: 401 273 0026

CAA PAD
08/04/15

July 7, 2015

RECEIVED
JUL 14 2015
BY:

USEPA
Office of Environmental Stewardship
Director, Air Compliance Program
Attn: Air Compliance Clerk
5 Post Office Square, Suite 100 (SEA)
Boston, MA 02114-2023

Re: Semi-Annual MACT II Compliance Report

Dear Sir or Madam:

SMM New England Corporation is pleased to submit the Semi-Annual MACT II Compliance Report for the period from January 1, 2015 through June 30, 2015. On October 7, 2011 Sims Metal Management New England Corporation purchased the assets and operations from the former Promet Marine Services Corporation located at 242 Allens Avenue, Providence, RI. We have continued operations of the ship repair business at its current location but at a significantly decreased scale.

This document illustrates compliance with the requirements of MACT II or the more stringent coating limitations in Appendix A, Section 2 of the Consent Agreement and Final Order issued to Promet Marine Services on December 7, 2010.

Included in this report are monthly and summary for the reporting period of surface coatings Used as Supplied, Low Usage Exempt Coatings, and thinner usage in the coating operations.

By visual inspections throughout the reporting period SMM New England Corporation has determined that all containers, drums and hose systems for coating storage and delivery were free of cracks, holes, and other defects, and remained close unless materials were being added to or removed from them. Based upon these inspections, it has been determined that compliance with 63.788(b)(2)(vi) has been continuous for each month in the reporting period.

Should have any questions regarding this report please feel free to contact me at any time.

Sincerely,

Scott Jacobs

Scott Jacobs
Regional SHEC Director
SMM New England Corporation

Cc: Ted Burns, RIDEM Air Resources

SMM New England Corporation
Coating Category Limits

Summary of VOC/VOHAP Emission Limits

Coating Category Code		VOHAP Limits		
		grams/liter coating (minus water and exempt compounds)	grams/liter solids	
			$t \geq 4.5\ ^{\circ}C$	$t < 4.5\ ^{\circ}C$
G1	Coating - General Use	340	571	728
S1	Specialty Coating - Air flask	340	571	728
S2	Specialty Coating - Antenna[1]	340	1,439	---
S3	Specialty Coating - Antifoulant	400	765	971
S4	Specialty Coating - Heat resistant	420	841	1,069
S5	Specialty Coating - High gloss[1]	340	841	1,069
S6	Specialty Coating - High-temperature	500	1,237	1,597
S7	Specialty Coating - Inorganic Zinc high-build	340	571	728
S8	Specialty Coating - Military exterior	340	571	728
S9	Specialty Coating - Mist	610	2,235	---
S10	Specialty Coating - Navigational aids[1]	340	1,597	---
S11	Specialty Coating - Non-skid	340	571	728
S12	Specialty Coating - Nuclear	420	841	1,069
S13	Specialty Coating - Organic zinc[1]	340	630	802
S14	Specialty Coating - Pretreatment wash primer[1]	420	11,095	---
S15	Specialty Coating - R&M Thermoplastics[1]	340	1.597	---
S16	Specialty Coating - Rubber camouflage	340	571	728
S17	Specialty Coating - Sealant for thermal spray aluminum	610	2,235	---
S18	Specialty Coating - Special Marking[1]	420	1,178	---
S19	Specialty Coating - Specialty interior	340	571	728
S20	Specialty Coating - Tack coat	610	2,235	---
S21	Specialty Coating - Undersea weapons systems	340	571	728
S22	Specialty Coating - Weld-through Preconstruction Primer[1]	340	2,885	---
T	Non-coating - Thinner	---	---	---

[1]Indicates a coating category that has a CAFO VOHAP Limit that is more stringent than the MACT II VOHAP Limit. The more stringent CAFO limit is provided in this table.

TABLE 2

SMM New England Corp.

Summary of MACT II Compliance (Jan 2015 through Jun. 2015)

Month	As Applied Compliance Status	LUE Compliance Status	Thinning Compliance Status		Coating Container Compliance Status
			Warm Weather (normal)	Cold Weather	
Jan	Continuous	Continuous	Continuous	Continuous	Continuous
Feb	Continuous	Continuous	Continuous	Continuous	Continuous
Mar	Continuous	Continuous	Continuous	Continuous	Continuous
Apr	Continuous	Continuous	Continuous	Continuous	Continuous
May	Continuous	Continuous	Continuous	Continuous	Continuous
June	Continuous	Continuous	Continuous	Continuous	Continuous
Period Jan. - Jun. 2015	Continuous	Continuous	Continuous	Continuous	Continuous

Attachment A: Master Paint and Thinner Usage Log

SMM New England Corporation
Master Paint and Thinner Usage Log

Calendar Year 2015

BEGIN ENTERING DATA IN ROW 8

Date	Month	Start Time	End Time	Coating Name (per MSDS)	Manufacturer	Batch ID	Coating Category Code	Coating Category Description	VOC Limit (g/L)	As-Supplied VOC Content (g/L)	Gallons Material Applied 8 pt = 1 gal 4 qt = 1 gal 128 oz = 1 gal	Was thinner applied?
23-Jan		700	1500	BarRust 235	Devoe/Glidden	QH4282UH	G1	Coating - General Use	340	292.0	40	No
4-Feb		700	1500	Interspeed 6400NA	International Paint	QH4450UH	S3	Specialty Coating - Antifoulant	400	385.0	17	No
10-Mar		700	1500	302H Zinc Primer (Dimetcote)	PPG Ameron	9424616228	G1	Coating - General Use	340	284.0	10	No
13-Mar		700	1500	BarRust 235	Devoe/Glidden	9446682079	G1	Coating - General Use	340	292.0	15	No
19-Mar		700	1500	Amercoat 450H	PPG Ameron	9443674106	G1	Coating - General Use	340	311.0	10	No
20-Mar		700	1500	Amercoat ABC #3	PPG Ameron	9426623683	S3	Specialty Coating - Antifoulant	400	396.0	22	No
20-Mar		700	1500	Interspeed 5640	International Paint	RC1619UH	S3	Specialty Coating - Antifoulant	400	388.0	15	No
24-Mar		700	1500	Amercoat ABC #3	PPG Ameron	9433643320	S3	Specialty Coating - Antifoulant	400	396.0	15	No
25-Mar		700	1500	BarRust 235	Devoe/Glidden	OD0038UHA3	G1	Coating - General Use	340	292.0	30	No
30-Mar		700	1500	BarRust 235	Devoe/Glidden	9420606168	G1	Coating - General Use	340	292.0	13	No
30-Mar		700	1500	Amercoat ABC #3	PPG Ameron	04X31722A	S3	Specialty Coating - Antifoulant	400	396.0	30	No
31-Mar		700	1500	BarRust 235	Devoe/Glidden	9420606168	G1	Coating - General Use	340	292.0	9	No
1-Apr		700	1500	Amercoat ABC #3	PPG Ameron	9333500592	S3	Specialty Coating - Antifoulant	400	396.0	30	No
2-Apr		700	1500	Amercoat ABC #3	PPG Ameron	9412581715	S3	Specialty Coating - Antifoulant	400	396.0	12	No
2-Apr		700	1500	Intershield 300V	International Paint	QJ5382UH	G1	Coating - General Use	340	326.0	11	No
6-Apr		700	1500	Amercoat ABC #3	PPG Ameron	9433643320	S3	Specialty Coating - Antifoulant	400	396.0	12	No
6-Apr		700	1500	Intershield 300V	International Paint	RA0108UH	G1	Coating - General Use	340	326.0	20	No
13-Apr		700	1500	Amercoat ABC #3	PPG Ameron	9427627128	S3	Specialty Coating - Antifoulant	400	396.0	15	No
13-Apr		700	1500	Intershield 300V	International Paint	RA0108UH	G1	Coating - General Use	340	326.0	15	No
13-Apr		700	1500	Interspeed 5640	International Paint	RC1619UH	S3	Specialty Coating - Antifoulant	400	388.0	15	No
14-Apr		700	1500	Interspeed 5640	International Paint	RC1619UH	S3	Specialty Coating - Antifoulant	400	388.0	15	No
16-Apr		700	1500	Trilux 33	International Paint	YBA063	S3	Specialty Coating - Antifoulant	400	390.0	3	No
21-Apr		700	1500	Amercoat ABC #3	PPG Ameron	9534647084	S3	Specialty Coating - Antifoulant	400	396.0	20	No
22-Apr		700	1500	Amercoat ABC #3	PPG Ameron	ABX3-92105	S3	Specialty Coating - Antifoulant	400	396.0	20	No
22-Apr		700	1500	Intergard 264	International Paint	RA0133OH	G1	Coating - General Use	340	194.0	12	No
23-Apr		700	1500	BarRust 235	Devoe/Glidden	RB1146UH	G1	Coating - General Use	340	292.0	25	No
29-Apr		700	1500	Interspeed 5640	International Paint	RC1619UH	S3	Specialty Coating - Antifoulant	400	388.0	15	No
29-Apr		700	1500	Intershield 300V	International Paint	QM8913UH	G1	Coating - General Use	340	326.0	6	No
29-Apr		700	1500	Interspeed 6400NA	International Paint	QL7984UH	S3	Specialty Coating - Antifoulant	400	385.0	15	No
5-May		700	1500	Zinc 302H (Cathacoat)	Devoe/Glidden	DC302H0250	S7	Specialty Coating - Inorganic Zinc high-build	340	282.0	5	No
7-May		700	1500	Interspeed 6400NA	International Paint	AB0617OH	S3	Specialty Coating - Antifoulant	400	385.0	20	No
12-May		700	1500	Interspeed 6400NA	International Paint	RB0632UH	S3	Specialty Coating - Antifoulant	400	385.0	30	No
12-May		700	1500	Intershield 300V	International Paint	QM8913UH	G1	Coating - General Use	340	326.0	5	No
15-May		700	1500	BarRust 235	Devoe/Glidden	9446682079	G1	Coating - General Use	340	292.0	25	No
14-May		700	1500	Interspeed 6400NA	International Paint	RB0632UH	S3	Specialty Coating - Antifoulant	400	385.0	20	No
20-May		700	1500	Zinc 302H (Cathacoat)	Devoe/Glidden	RC1661OH	S7	Specialty Coating - Inorganic Zinc high-build	340	282.0	2	No
20-May		700	1500	BarRust 235	Devoe/Glidden	334054	G1	Coating - General Use	340	292.0	25	No
20-May		700	1500	Amercoat ABC #3	PPG Ameron	9427627128	S3	Specialty Coating - Antifoulant	400	396.0	20	No
21-May		700	1500	BarRust 235	Devoe/Glidden	QL7809UH	G1	Coating - General Use	340	292.0	7	No
22-May		700	1500	Interspeed 6400NA	International Paint	RB0617UH	S3	Specialty Coating - Antifoulant	400	385.0	15	No
22-May		700	1500	Amercoat ABC #3	PPG Ameron	9503703803	S3	Specialty Coating - Antifoulant	400	396.0	25	No
22-May		700	1500	Amerlock 400	PPG Ameron	05132286A	G1	Coating - General Use	340	180.0	7	No
26-May		700	1500	PCA Antifouling Paint	West Marine	7585342	S3	Specialty Coating - Antifoulant	340	330.0	14	No
28-May		700	1500	Interspeed 6400NA	International Paint	RB0617UH	S3	Specialty Coating - Antifoulant	400	385.0	25	No
28-May		700	1500	Zinc 302H (Cathacoat)	Devoe/Glidden	QL7477UH	S7	Specialty Coating - Inorganic Zinc high-build	340	282.0	3	No
29-May		700	1500	BarRust 235	Devoe/Glidden	QJ4779UH	G1	Coating - General Use	340	292.0	5	No
4-Jun		700	1500	BarRust 235	Devoe/Glidden	RA9659UH	G1	Coating - General Use	340	292.0	9	No
4-Jun		700	1500	Zinc 302H (Cathacoat)	Devoe/Glidden	RC1661UH	S7	Specialty Coating - Inorganic Zinc high-build	340	282.0	2	No
11-Jun		700	1500	Intershield 300V	International Paint	RB0332UH	G1	Coating - General Use	340	326.0	3	No
11-Jun		700	1500	Interspeed 6400NA	International Paint	RA9444UH	S3	Specialty Coating - Antifoulant	400	385.0	20	No
5-Jun		700	1500	Amercoat 450H	PPG Ameron	9408569063	G1	Coating - General Use	340	311.0	6	No
5-Jun		700	1500	Amercoat ABC #3	PPG Ameron	9333500592	S3	Specialty Coating - Antifoulant	400	396.0	20	No
10-Jun		700	1500	BarRust 235	Devoe/Glidden	RA9941UH	G1	Coating - General Use	340	292.0	15	No

Date	Month	Start Time	End Time	Coating Name (per MSDS)	Manufacturer	Batch ID	Coating Category Code	Coating Category Description	VOC Limit (g/L)	As-Supplied VOC Content (g/L)	Gallons Material Applied 8 pt = 1 gal 4 qt = 1 gal 128 oz = 1 gal	Was thinner applied?
11-Jun		700	1500	BarRust 235	Devoe/Glidden	RB1146UH	G1	Coating - General Use	340	292.0	15	No
11-Jun		700	1500	Interspeed 6400NA	International Paint	RB0617UH	S3	Specialty Coating - Antifoulant	400	385.0	25	No
18-Jun		700	1500	Interspeed 6400NA	International Paint	RC1902UH	S3	Specialty Coating - Antifoulant	400	385.0	25	No
18-Jun		700	1500	Amercoat ABC #3	PPG Ameron	9511732208	S3	Specialty Coating - Antifoulant	400	396.0	20	No
22-Jun		700	1500	BarRust 235	Devoe/Glidden	9446682079	G1	Coating - General Use	340	292.0	15	No
23-Jun		700	1500	Interspeed 6400NA	International Paint	PD2688UH	S3	Specialty Coating - Antifoulant	400	385.0	17	No
23-Jun		700	1500	Amerlock 400	PPG Ameron	9341522849	G1	Coating - General Use	340	180.0	16	No
24-Jun		700	1500	Interspeed 6400NA	International Paint	RC1903UH	S3	Specialty Coating - Antifoulant	400	385.0	15	No
24-Jun		700	1500	Intershield 300V	International Paint	RC1647UH	G1	Coating - General Use	340	326.0	3	No
24-Jun		700	1500	Amerlock 400	PPG Ameron	00333546	G1	Coating - General Use	340	180.0	4	No
24-Jun		700	1500	BarRust 235	Devoe/Glidden	RA9941UH	G1	Coating - General Use	340	292.0	18	No
25-Jun		700	1500	Amerlock 400	PPG Ameron	0033376	G1	Coating - General Use	340	180.0	11	No
25-Jun		700	1500	Interthane 990HS	International Paint	RB1080UH	S5	Specialty Coating - High gloss1	340	327.0	6	No
29-Jun		700	1500	Interspeed 6400NA	International Paint	RB1095UH	S3	Specialty Coating - Antifoulant	400	385.0	18	No
30-Jun		700	1500	Amercoat 235	PPG Ameron	334054	G1	Coating- General Use	340	292.0	10	No

Attachment B: Records for Surface Coatings Used As Supplied

SMM New England Corporation
242 Allens Avenue
Providence, Rhode Island 02905

Contact: Scott Jacobs
Phone: (401) 752-2000

January, 2015

NESHAP Semi-Annual Report
Surface Coatings Applied "As-Supplied"

Coating Name	Volume of Coating Applied "As-Supplied" (gallons)	Coating Category Code	Coating Category Description	NESHAP VOC Limit (g/L)	As-Supplied VOC Content (g/L)
BarRust 235	40	G1	Coating - General Use	340	292.0

[1]Indicates a coating category that has a CAFO VOHAP Limit that is more stringent than the MACT II VOHAP Limit. The more stringent CAFO limit is provided in this table.

SMM New England Corporation
242 Allens Avenue
Providence, Rhode Island 02905

Contact: Scott Jacobs
Phone: (401) 752-2000

February, 2015

NESHAP Semi-Annual Report
Surface Coatings Applied "As-Supplied"

Coating Name	Volume of Coating Applied "As-Supplied" (gallons)	Coating Category Code	Coating Category Description	NESHAP VOC Limit (g/L)	As-Supplied VOC Content (g/L)
Interspeed 6400NA	17	S3	Specialty Coating - Antifoulant	400	385.0

[1]Indicates a coating category that has a CAFO VOHAP Limit that is more stringent than the MACT II VOHAP Limit. The more stringent CAFO limit is provided in this table.

SMM New England Corporation
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Providence, Rhode Island 02905

Contact: Scott Jacobs
Phone: (401) 752-2000

March, 2015

NESHAP Semi-Annual Report
Surface Coatings Applied "As-Supplied"

Coating Name	Volume of Coating Applied "As-Supplied" (gallons)	Coating Category Code	Coating Category Description	NESHAP VOC Limit (g/L)	As-Supplied VOC Content (g/L)
BarRust 235	67	G1	Coating - General Use	340	292.0
Amercoat ABC#3	67	S3	Specialty coating - Antifoulant	400	396.0
Interspeed 5640	15	S3	Specialty coating - Antifoulant	400	388.0
302H Zinc primer (Dimetcote)	10	G1	Coating - General Use	340	284.0
Amercoat 450H	10	G1	Coating - General Use	340	311.0

[1]Indicates a coating category that has a CAFO VOHAP Limit that is more stringent than the MACT II VOHAP Limit. The more stringent CAFO limit is provided in this table.

SMM New England Corporation
242 Allens Avenue
Providence, Rhode Island 02905

Contact: Scott Jacobs
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April, 2015

NESHAP Semi-Annual Report
Surface Coatings Applied "As-Supplied"

Coating Name	Volume of Coating Applied "As-Supplied" (gallons)	Coating Category Code	Coating Category Description	NESHAP VOC Limit (g/L)	As-Supplied VOC Content (g/L)
Amercoat ABC #3	109	S3	Specialty Coating - Antifoulant	400	396.0
Intershield 300V	52	G1	Coating - General Use	340	326.0
Interspeed 5640	45	S3	Specialty Coating - Antifoulant	400	388.0
BarRust 235	25	G1	Coating - General Use	340	292.0
Interspeed 6400NA	15	S3	Specialty Coating - Antifoulant	400	385.0
Intergard 264	12	G1	Coating - General Use	340	194.0
Trilux 33	3	S3	Specialty Coating - Antifoulant	400	390.0

[1]Indicates a coating category that has a CAFO VOHAP Limit that is more stringent than the MACT II VOHAP Limit. The more stringent CAFO limit is provided in this table.

SMM New England Corporation
242 Allens Avenue
Providence, Rhode Island 02905

Contact: Scott Jacobs
Phone: (401) 752-2000

May, 2015

NESHAP Semi-Annual Report
Surface Coatings Applied "As-Supplied"

Coating Name	Volume of Coating Applied "As-Supplied" (gallons)	Coating Category Code	Coating Category Description	NESHAP VOC Limit (g/L)	As-Supplied VOC Content (g/L)
Interspeed 6400NA	110	S3	Specialty Coating - Antifoulant	400	385.0
BarRust 235	62	G1	Coating - General Use	340	282.0
Amercoat ABC #3	45	S3	Specialty Coating - Antifoulant	400	396.0
Zinc 302H (Cathacoat)	10	S7	Specialty Coating - Inorganic Zinc high-build	340	282.0
Amerlock 400	7	G1	Coating - General Use	340	180.0
Intershield 300V	5	G1	Coating - General Use	340	326.0
PCA Antifouling Paint	14	S3	Specialty Coating - Antifoulant	400	330.0

[1]Indicates a coating category that has a CAFO VOHAP Limit that is more stringent than the MACT II VOHAP Limit. The more stringent CAFO limit is provided in this table.

SMM New England Corporation
242 Allens Avenue
Providence, Rhode Island 02905

Contact: Scott Jacobs
Phone: (401) 752-2000

June, 2015

NESHAP Semi-Annual Report
Surface Coatings Applied "As-Supplied"

Coating Name	Volume of Coating Applied "As-Supplied" (gallons)	Coating Category Code	Coating Category Description	NESHAP VOC Limit (g/L)	As-Supplied VOC Content (g/L)
Interspeed 6400NA	120	S3	Specialty Coating - Antifoulant	400	385.0
BarRust 235	72	G1	Coating - General Use	340	292.0
Amercoat ABC #3	40	S3	Specialty Coating - Antifoulant	400	396.0
Amerlock 400	31	G1	Coating - General Use	340	180.0
Amercoat 235	10	G1	Coating - General Use	340	292.0
Intershield 300V	6	G1	Coating - General Use	340	326.0
Interthane 990HS	6	S5	Specialty Coating - High Gloss1	340	327.0
Amercoat 450H	6	G1	Coating - General Use	340	311.0
Zinc 302H (Cathacoat)	2	S7	Specialty Coating - Inorganic Zinc High-build	340	282.0

[1]Indicates a coating category that has a CAFO VOHAP Limit that is more stringent than the MACT II VOHAP Limit. The more stringent CAFO limit is provided in this table.

SMM New England Corporation
242 Allens Avenue
Providence, Rhode Island 02905

Contact: Scott Jacobs
Phone: (401) 752-2000

Summary for 6 Month Period
January through June, 2015

NESHAP Semi-Annual Report
Summary of Surface Coatings
Applied "As-Supplied"

Coating Name	Volume of Coating Applied "As-Supplied" (gallons)	Coating Category Code	Coating Category Description	NESHAP VOC Limit (g/L)	As-Supplied VOC Content (g/L)
BarRust 235	266	G1	Coating - General Use	340	292.0
Interspeed 6400NA	262	S3	Specialty Coating - Antifoulant	400	385.0
Amercoat ABC #3	261	S3	Specialty Coating - Antifoulant	400	396.0
Intershield 300V	63	G1	Coating - General Use	340	326.0
Interspeed 5640	60	S3	Specialty Coating - Antifoulant	400	388.0
Amerlcok 400	38	G1	Coating - General Use	340	180.0
Amercoat 450H	16	G1	Coating - General Use	340	311.0
PCA Antifouling Paint	14	S3	Specialty Coating - Antifoulant	400	330.0
Intergard 264	12	G1	Coating - General Use	340	194.0
Zinc 302H (Cathacoat)	12	S7	Specialty Coating - Inorganic Zinc High-build	340	282.0
Amercoat 235	10	G1	Coating - General Use	340	292.0
Interthane 990HS	6	S5	Specialty coating - High Gloss1	340	327.0
Trilux 33	3	S3	Specialty Coating - Antifoulant	400	390.0

[1]Indicates a coating category that has a CAFO VOHAP Limit that is more stringent than the MACT II VOHAP Limit. The more stringent CAFO limit is provided in this table.

Attachment C: Records for Surface Coatings Designated LUE

SMM New England Corporation
242 Allens Avenue
Providence, Rhode Island 02905

Contact: Scott Jacobs
Phone: (401) 752-2000

January, 2015

NESHAP Semi-Annual Report
Low Usage Exempt (Lue) Surface Coatings

Coating Name	Volume of Coating Applied "As-Supplied" (gallons)	Coating Category Code	Coating Category Description	NESHAP VOC Limit (g/L)	As-Supplied VOC Content (g/L)
No Low-Usage Exempt coating were applied during the month of January					

[1]Indicates a coating category that has a CAFO VOHAP Limit that is more stringent than the MACT II VOHAP Limit. The more stringent CAFO limit is provided in this table.

SMM New England Corporation
242 Allens Avenue
Providence, Rhode Island 02905

Contact: Scott Jacobs
Phone: (401) 752-2000

February, 2015

NESHAP Semi-Annual Report
Low Usage Exempt (Lue) Surface Coatings

Coating Name	Volume of Coating Applied "As-Supplied" (gallons)	Coating Category Code	Coating Category Description	NESHAP VOC Limit (g/L)	As-Supplied VOC Content (g/L)
No Low-Usage Exempt coating were applied during the month of February					

[1]Indicates a coating category that has a CAFO VOHAP Limit that is more stringent than the MACT II VOHAP Limit. The more stringent CAFO limit is provided in this table.

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Providence, Rhode Island 02905

Contact: Scott Jacobs
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March, 2015

NESHAP Semi-Annual Report
Low Usage Exempt (Lue) Surface Coatings

Coating Name	Volume of Coating Applied "As-Supplied" (gallons)	Coating Category Code	Coating Category Description	NESHAP VOC Limit (g/L)	As-Supplied VOC Content (g/L)
No Low-Usage Exempt coating were applied during the month of March					

[1]Indicates a coating category that has a CAFO VOHAP Limit that is more stringent than the MACT II VOHAP Limit. The more stringent CAFO limit is provided in this table.

SMM New England Corporation
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Providence, Rhode Island 02905

Contact: Scott Jacobs
Phone: (401) 752-2000

April, 2015

NESHAP Semi-Annual Report
Low Usage Exempt (Lue) Surface Coatings

Coating Name	Volume of Coating Applied "As-Supplied" (gallons)	Coating Category Code	Coating Category Description	NESHAP VOC Limit (g/L)	As-Supplied VOC Content (g/L)

[1]Indicates a coating category that has a CAFO VOHAP Limit that is more stringent than the MACT II VOHAP Limit. The more stringent CAFO limit is provided in this table.

SMM New England Corporation
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Contact: Scott Jacobs
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May, 2015

NESHAP Semi-Annual Report
Low Usage Exempt (Lue) Surface Coatings

Coating Name	Volume of Coating Applied "As-Supplied" (gallons)	Coating Category Code	Coating Category Description	NESHAP VOC Limit (g/L)	As-Supplied VOC Content (g/L)
No Low-Usage Exempt coating were applied during the month of May					

[1]Indicates a coating category that has a CAFO VOHAP Limit that is more stringent than the MACT II VOHAP Limit. The more stringent CAFO limit is provided in this table.

SMM New England Corporation
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Contact: Scott Jacobs
Phone: (401) 752-2000

June, 2015

NESHAP Semi-Annual Report
Low Usage Exempt (Lue) Surface Coatings

Coating Name	Volume of Coating Applied "As-Supplied" (gallons)	Coating Category Code	Coating Category Description	NESHAP VOC Limit (g/L)	As-Supplied VOC Content (g/L)
No Low-Usage Exempt coating were applied during the month of June					

[1]Indicates a coating category that has a CAFO VOHAP Limit that is more stringent than the MACT II VOHAP Limit. The more stringent CAFO limit is provided in this table.

SMM New England Corporation
242 Allens Avenue
Providence, Rhode Island 02905

Contact: Scott Jacobs
Phone: (401) 752-2000

Summary for 6 Month Period
January through June, 2015

NESHAP Semi-Annual Report
Summary of Low Usage
Exempt (Lue) Surface Coatings

Coating Name	Volume of Coating Applied "As-Supplied" (gallons)	Coating Category Code	Coating Category Description	NESHAP VOC Limit (g/L)	As-Supplied VOC Content (g/L)
No Low-Usage Exempt coating were applied during the months of January through June					

[1]Indicates a coating category that has a CAFO VOHAP Limit that is more stringent than the MACT II VOHAP Limit. The more stringent CAFO limit is provided in this table.

Attachment D: Records for Surface Coatings Applied with Thinner Added (ambient temperature greater than or equal to 4.5 Deg. C)

SMM New England Corporation
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NESHAP Semi-Annual Report

January, 2015

Surface Coatings Applied with Thinner Added (ambient temperature ≥ 4.5 °C)

Coating Name	Coating Category Code	Coating Category Description	NESHAP VOC Limit (g/L)	Volume of Coating Applied "As-Supplied" (gallons)	Maximium Allowable Thinner Ratio	Maximum Allowable Volume of Thinner (gallons)	Actual Volume of Thinner Added (gallons)
No coatings were thinned during the month of January at normal conditions (temperatures greater than or equal to 40 °F)							

[1]Indicates a coating category that has a CAFO VOHAP Limit that is more stringent than the MACT II VOHAP Limit. The more stringent CAFO limit is provided in this table.

SMM New England Corporation
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NESHAP Semi-Annual Report

February, 2015

Surface Coatings Applied with Thinner Added (ambient temperature ≥ 4.5 °C)

Coating Name	Coating Category Code	Coating Category Description	NESHAP VOC Limit (g/L)	Volume of Coating Applied "As-Supplied" (gallons)	Maximium Allowable Thinner Ratio	Maximum Allowable Volume of Thinner (gallons)	Actual Volume of Thinner Added (gallons)
No coatings were thinned during the month of February at normal conditions (temperatures greater than or equal to 40 °F)							

[1]Indicates a coating category that has a CAFO VOHAP Limit that is more stringent than the MACT II VOHAP Limit. The more stringent CAFO limit is provided in this table.

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NESHAP Semi-Annual Report

March, 2015

Surface Coatings Applied with Thinner Added (ambient temperature ≥ 4.5 °C)

Coating Name	Coating Category Code	Coating Category Description	NESHAP VOC Limit (g/L)	Volume of Coating Applied "As-Supplied" (gallons)	Maximium Allowable Thinner Ratio	Maximum Allowable Volume of Thinner (gallons)	Actual Volume of Thinner Added (gallons)
No coatings were thinned during the month of March at normal conditions (temperatures greater than or equal to 40 °F)							

[1]Indicates a coating category that has a CAFO VOHAP Limit that is more stringent than the MACT II VOHAP Limit. The more stringent CAFO limit is provided in this table.

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NESHAP Semi-Annual Report

April, 2015

Surface Coatings Applied with Thinner Added (ambient temperature ≥ 4.5 °C)

Coating Name	Coating Category Code	Coating Category Description	NESHAP VOC Limit (g/L)	Volume of Coating Applied "As-Supplied" (gallons)	Maximium Allowable Thinner Ratio	Maximum Allowable Volume of Thinner (gallons)	Actual Volume of Thinner Added (gallons)
No coatings were thinned during the month of April at normal conditions (temperatures greater than or equal to 40 deg. F.)							

[1]Indicates a coating category that has a CAFO VOHAP Limit that is more stringent than the MACT II VOHAP Limit. The more stringent CAFO limit is provided in this table.

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NESHAP Semi-Annual Report

May, 2015

Surface Coatings Applied with Thinner Added (ambient temperature ≥ 4.5 °C)

Coating Name	Coating Category Code	Coating Category Description	NESHAP VOC Limit (g/L)	Volume of Coating Applied "As-Supplied" (gallons)	Maximium Allowable Thinner Ratio	Maximum Allowable Volume of Thinner (gallons)	Actual Volume of Thinner Added (gallons)
No coatings were thinned during the month of May at normal conditions (temperatures greater than or equal to 40 °F)							

[1]Indicates a coating category that has a CAFO VOHAP Limit that is more stringent than the MACT II VOHAP Limit. The more stringent CAFO limit is provided in this table.

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NESHAP Semi-Annual Report

June, 2015

Surface Coatings Applied with Thinner Added (ambient temperature ≥ 4.5 °C)

Coating Name	Coating Category Code	Coating Category Description	NESHAP VOC Limit (g/L)	Volume of Coating Applied "As-Supplied" (gallons)	Maximium Allowable Thinner Ratio	Maximum Allowable Volume of Thinner (gallons)	Actual Volume of Thinner Added (gallons)
No coatings were thinned during the month of June at normal conditions (temperatures greater than or equal to 40 °F)							

[1]Indicates a coating category that has a CAFO VOHAP Limit that is more stringent than the MACT II VOHAP Limit. The more stringent CAFO limit is provided in this table.

SMM New England Corporation
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NESHAP Special Report
Summary of Surface Coating
Applied with Thinner Added (ambient temperature ≥ 4.5 °C)

Summary for 6 Month Period
January through June, 2015

Coating Name	Coating Category Code	Coating Category Description	NESHAP VOC Limit (g/L)	Volume of Coating Applied "As-Supplied" (gallons)	Maximium Allowable Thinner Ratio	Maximum Allowable Volume of Thinner (gallons)	Actual Volume of Thinner Added (gallons)
No coatings were thinned during the months of January through June at normal conditions (temperatures greater than or equal to 40 deg. F.)							

[1]Indicates a coating category that has a CAFO VOHAP Limit that is more stringent than the MACT II VOHAP Limit. The more stringent CAFO limit is provided in this table.

Attachment E: Records for Surface Coatings Applied with Thinner Added (ambient temperature less than 4.5 Deg. C)

SMM New England Corporation
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NESHAP Semi-Annual Report

January, 2015

Surface Coatings Applied with Thinner Added (ambient temperature < 4.5 °C)

Coating Name	Coating Category Code	Coating Category Description	NESHAP VOC Limit (g/L)	Volume of Coating Applied "As-Supplied" (gallons)	Maximium Allowable Thinner Ratio	Maximum Allowable Volume of Thinner (gallons)	Actual Volume of Thinner Added (gallons)
No coatings were thinned during the month of January at cold weather conditions (temperatures less than 40 °F)							

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NESHAP Semi-Annual Report

February, 2015

Surface Coatings Applied with Thinner Added (ambient temperature < 4.5 °C)

Coating Name	Coating Category Code	Coating Category Description	NESHAP VOC Limit (g/L)	Volume of Coating Applied "As-Supplied" (gallons)	Maximium Allowable Thinner Ratio	Maximum Allowable Volume of Thinner (gallons)	Actual Volume of Thinner Added (gallons)
No coatings were thinned during the month of February at cold weather conditions (temperatures less than 40 °F)							

[1]Indicates a coating category that has a CAFO VOHAP Limit that is more stringent than the MACT II VOHAP Limit. The more stringent CAFO limit is provided in this table.

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NESHAP Semi-Annual Report

March, 2015

Surface Coatings Applied with Thinner Added (ambient temperature < 4.5 °C)

Coating Name	Coating Category Code	Coating Category Description	NESHAP VOC Limit (g/L)	Volume of Coating Applied "As-Supplied" (gallons)	Maximium Allowable Thinner Ratio	Maximum Allowable Volume of Thinner (gallons)	Actual Volume of Thinner Added (gallons)
No coatings were thinned during the month of March at cold weather conditions (temperatures less than 40 °F)							

[1]Indicates a coating category that has a CAFO VOHAP Limit that is more stringent than the MACT II VOHAP Limit. The more stringent CAFO limit is provided in this table.

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NESHAP Semi-Annual Report

April, 2015

Surface Coatings Applied with Thinner Added (ambient temperature < 4.5 °C)

Coating Name	Coating Category Code	Coating Category Description	NESHAP VOC Limit (g/L)	Volume of Coating Applied "As-Supplied" (gallons)	Maximium Allowable Thinner Ratio	Maximum Allowable Volume of Thinner (gallons)	Actual Volume of Thinner Added (gallons)
No coatings were thinned during the month of April at cold weather conditions (temperatures less than 40 °F)							

[1]Indicates a coating category that has a CAFO VOHAP Limit that is more stringent than the MACT II VOHAP Limit. The more stringent CAFO limit is provided in this table.

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NESHAP Semi-Annual Report

May, 2015

Surface Coatings Applied with Thinner Added (ambient temperature < 4.5 °C)

Coating Name	Coating Category Code	Coating Category Description	NESHAP VOC Limit (g/L)	Volume of Coating Applied "As-Supplied" (gallons)	Maximium Allowable Thinner Ratio	Maximum Allowable Volume of Thinner (gallons)	Actual Volume of Thinner Added (gallons)
No coatings were thinned during the month of May at cold weather conditions (temperatures less than 40 °F)							

[1]Indicates a coating category that has a CAFO VOHAP Limit that is more stringent than the MACT II VOHAP Limit. The more stringent CAFO limit is provided in this table.

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NESHAP Semi-Annual Report

June, 2015

Surface Coatings Applied with Thinner Added (ambient temperature < 4.5 °C)

Coating Name	Coating Category Code	Coating Category Description	NESHAP VOC Limit (g/L)	Volume of Coating Applied "As-Supplied" (gallons)	Maximium Allowable Thinner Ratio	Maximum Allowable Volume of Thinner (gallons)	Actual Volume of Thinner Added (gallons)
No coatings were thinned during the month of June at cold weather conditions (temperatures less than 40 °F)							

[1]Indicates a coating category that has a CAFO VOHAP Limit that is more stringent than the MACT II VOHAP Limit. The more stringent CAFO limit is provided in this table.

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NESHAP Special Report
Summary of Surface Coating
Applied with Thinner Added (ambient temperature < 4.5 °C)

Summary for 6 Month Period
January through June, 2015

Coating Name	Coating Category Code	Coating Category Description	NESHAP VOC Limit (g/L)	Volume of Coating Applied "As-Supplied" (gallons)	Maximum Allowable Thinner Ratio	Maximum Allowable Volume of Thinner (gallons)	Actual Volume of Thinner Added (gallons)
No coatings were thinned during the months of January through June at cold weather conditions (temperatures less than 40 °F)							

[1]Indicates a coating category that has a CAFO VOHAP Limit that is more stringent than the MACT II VOHAP Limit. The more stringent CAFO limit is provided in this table.

Attachment F: Inspection Records

SIMS METAL MANAGEMENT
Container Self-Inspection Log

Month of JANUARY 2015

Inspection Date	By	Cracks (Y/N)	Holes (Y/N)	Other (Y/N)	Containers Closed (Y/N)	Describe findings and corrective action taken
1/1/2015						HOLIDAY
1/2/2015	MIKE C.	N	N	N	Y	
1/3/2015						WEEKEND
1/4/2015						
1/5/2015	"	N	N	N	Y	
1/6/2015	"	N	N	N	Y	
1/7/2015	"	N	N	N	Y	
1/8/2015	"	N	N	N	Y	
1/9/2015	"	N	N	N	Y	
1/10/2015						WEEKEND
1/11/2015						
1/12/2015	"	N	N	N	Y	
1/13/2015	"	N	N	N	Y	
1/14/2015	"	N	N	N	Y	
1/15/2015	"	N	N	N	Y	
1/16/2015	"	N	N	N	Y	
1/17/2015						WEEKEND
1/18/2015						
1/19/2015	"	N	N	N	Y	
1/20/2015	"	N	N	N	Y	
1/21/2015	"	N	N	N	Y	
1/22/2015	"	N	N	N	Y	
1/23/2015	"	N	N	N	Y	
1/24/2015						WEEKEND
1/25/2015						
1/26/2015	"	N	N	N	Y	
1/27/2015						SNOW DAY - CLOSED
1/28/2015	"	N	N	N	Y	
1/29/2015	"	N	N	N	Y	
1/30/2015	"	N	N	N	Y	
1/31/2015						WEEKEND

SIMS METAL MANAGEMENT
Container Self-Inspection Log

Month of FEBRUARY 2015

Inspection Date	By	Cracks (Y/N)	Holes (Y/N)	Other (Y/N)	Containers Closed (Y/N)	Describe findings and corrective action taken
2/1/2015						Weekend
2/2/2015	Mike Cotter	N	N	N	Y	
2/3/2015	"	N	N	N	Y	
2/4/2015	"	N	N	N	Y	
2/5/2015	"	N	N	N	Y	
2/6/2015	"	N	N	N	Y	
2/7/2015						Weekend
2/8/2015						
2/9/2015	"	N	N	N	Y	
2/10/2015	"	N	N	N	Y	
2/11/2015	"	N	N	N	Y	
2/12/2015	"	N	N	N	Y	
2/13/2015	"	N	N	N	Y	
2/14/2015						Weekend
2/15/2015						
2/16/2015	"	N	N	N	Y	
2/17/2015	"	N	N	N	Y	
2/18/2015	"	N	N	N	Y	
2/19/2015	"	N	N	N	Y	
2/20/2015	"	N	N	N	Y	
2/21/2015						Weekend
2/22/2015						
2/23/2015	"	N	N	N	Y	
2/24/2015	"	N	N	N	Y	
2/25/2015	"	N	N	N	Y	
2/26/2015	"	N	N	N	Y	
2/27/2015	"	N	N	N	Y	
2/28/2015						weekend

SIMS METAL MANAGEMENT
Container Self-Inspection Log

Month of MARCH 2015

Inspection Date	By	Cracks (Y/N)	Holes (Y/N)	Other (Y/N)	Containers Closed (Y/N)	Describe findings and corrective action taken
3/1/2015						Weekend
3/2/2015	Mike Cohen	N	N	N	Y	
3/3/2015	"	N	N	N	Y	
3/4/2015	"	N	N	N	Y	
3/5/2015	"	N	N	N	Y	
3/6/2015	"	N	N	N	Y	
3/7/2015						Weekend
3/8/2015						
3/9/2015	"	N	N	N	Y	
3/10/2015	"	N	N	N	Y	
3/11/2015	"	N	N	N	Y	
3/12/2015	"	N	N	N	Y	
3/13/2015	"	N	N	N	Y	
3/14/2015						Weekend
3/15/2015						
3/16/2015	"	N	N	N	Y	
3/17/2015	"	N	N	N	Y	
3/18/2015	"	N	N	N	Y	
3/19/2015	"	N	N	N	Y	
3/20/2015	"	N	N	N	Y	
3/21/2015						Weekend
3/22/2015						
3/23/2015	"	N	N	N	Y	
3/24/2015	"	N	N	N	Y	
3/25/2015	"	N	N	N	Y	
3/26/2015	"	N	N	N	Y	
3/27/2015	"	N	N	N	Y	
3/28/2015						Weekend
3/29/2015						
3/30/2015	"	N	N	N	Y	
3/31/2015	"	N	N	N	Y	

SIMS METAL MANAGEMENT
Container Self-Inspection Log

Month of APRIL 2015

Inspection Date	By	Cracks (Y/N)	Holes (Y/N)	Other (Y/N)	Containers Closed (Y/N)	Describe findings and corrective action taken
4/1/2015	Mike Cohen	N	N	N	Y	
4/2/2015	Mike Cohen	N	N	N	Y	
4/3/2015	Mike Cohen	N	N	N	Y	
4/4/2015	Weekend					
4/5/2015	Weekend					
4/6/2015	Mike Cohen	N	N	N	Y	
4/7/2015	Mike Cohen	N	N	N	Y	
4/8/2015	Mike Cohen	N	N	N	Y	
4/9/2015	Mike Cohen	N	N	N	Y	
4/10/2015	Mike Cohen	N	N	N	Y	
4/11/2015	Weekend					
4/12/2015	Weekend					
4/13/2015	Mike Cohen	N	N	N	Y	
4/14/2015	Mike Cohen	N	N	N	Y	
4/15/2015	Mike Cohen	N	N	N	Y	
4/16/2015	Mike Cohen	N	N	N	Y	
4/17/2015	Mike Cohen	N	N	N	Y	
4/18/2015	Weekend					
4/19/2015	Weekend					
4/20/2015	Joe Bellamy	N	N	N	Y	
4/21/2015	Joe Bellamy	N	N	N	Y	
4/22/2015	Joe Bellamy	N	N	N	Y	
4/23/2015	Joe Bellamy	N	N	N	Y	
4/24/2015	Joe Bellamy	N	N	N	Y	
4/25/2015	Weekend					
4/26/2015	Weekend					
4/27/2015	Mike Cohen	N	N	N	Y	
4/28/2015	Mike Cohen	N	N	N	Y	
4/29/2015	Mike Cohen	N	N	N	Y	
4/30/2015	Mike Cohen	N	N	N	Y	

SIMS METAL MANAGEMENT
Container Self-Inspection Log

Month of MAY 2015

Inspection Date	By	Cracks (Y/N)	Holes (Y/N)	Other (Y/N)	Containers Closed (Y/N)	Describe findings and corrective action taken
5/1/2015	Mike Cohen	N	N	N	Y	
5/2/2015	Weekend					
5/3/2015	Weekend					
5/4/2015	Mike Cohen	N	N	N	Y	
5/5/2015	Mike Cohen	N	N	N	Y	
5/6/2015	Mike Cohen	N	N	N	Y	
5/7/2015	Mike Cohen	N	N	N	Y	
5/8/2015	Mike Cohen	N	N	N	Y	
5/9/2015	Weekend					
5/10/2015	Weekend					
5/11/2015	Mike Cohen	N	N	N	Y	
5/12/2015	Mike Cohen	N	N	N	Y	
5/13/2015	Mike Cohen	N	N	N	Y	
5/14/2015	Mike Cohen	N	N	N	Y	
5/15/2015	Mike Cohen	N	N	N	Y	
5/16/2015	Weekend					
5/17/2015	Weekend					
5/18/2015	Mike Cohen	N	N	N	Y	
5/19/2015	Mike Cohen	N	N	N	Y	
5/20/2015	Mike Cohen	N	N	N	Y	
5/21/2015	Mike Cohen	N	N	N	Y	
5/22/2015	Mike Cohen	N	N	N	Y	
5/23/2015	Weekend					
5/24/2015	Weekend					
5/25/2015	Holiday					
5/26/2015	Mike Cohen	N	N	N	Y	
5/27/2015	Mike Cohen	N	N	N	Y	
5/28/2015	Mike Cohen	N	N	N	Y	
5/29/2015	Mike Cohen	N	N	N	Y	
5/30/2015	Weekend					
5/31/2015	Weekend					

SIMS METAL MANAGEMENT
Container Self-Inspection Log

Month of JUNE 2015

Inspection Date	By	Cracks (Y/N)	Holes (Y/N)	Other (Y/N)	Containers Closed (Y/N)	Describe findings and corrective action taken
6/1/2015	Mike Cohen	N	N	N	Y	
6/2/2015	Mike Cohen	N	N	N	Y	
6/3/2015	Mike Cohen	N	N	N	Y	
6/4/2015	Mike Cohen	N	N	N	Y	
6/5/2015	Mike Cohen	N	N	N	Y	
6/6/2015	Weekend					
6/7/2015	Weekend					
6/8/2015	Mike Cohen	N	N	N	Y	
6/9/2015	Mike Cohen	N	N	N	Y	
6/10/2015	Mike Cohen	N	N	N	Y	
6/11/2015	Mike Cohen	N	N	N	Y	
6/12/2015	Mike Cohen	N	N	N	Y	
6/13/2015	Weekend					
6/14/2015	Weekend					
6/15/2015	Mike Cohen	N	N	N	Y	
6/16/2015	Mike Cohen	N	N	N	Y	
6/17/2015	Mike Cohen	N	N	N	Y	
6/18/2015	Mike Cohen	N	N	N	Y	
6/19/2015	Mike Cohen	N	N	N	Y	
6/20/2015	Weekend					
6/21/2015	Weekend					
6/22/2015	Mike Cohen	N	N	N	Y	
6/23/2015	Mike Cohen	N	N	N	Y	
6/24/2015	Mike Cohen	N	N	N	Y	
6/25/2015	Mike Cohen	N	N	N	Y	
6/26/2015	Mike Cohen	N	N	N	Y	
6/27/2015	Weekend					
6/28/2015	Weekend					
6/29/2015	Mike Cohen	N	N	N	Y	
6/30/2015	Mike Cohen	N	N	N	Y	