



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
AIR QUALITY PROGRAM

PLAN APPROVAL

Issue Date: June 23, 2025

Effective Date: June 23, 2025

Expiration Date: December 20, 2026

In accordance with the provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and 25 Pa. Code Chapter 127, the Owner, [and Operator if noted] (hereinafter referred to as permittee) identified below is authorized by the Department of Environmental Protection (Department) to construct, install, modify or reactivate the air emission source(s) more fully described in the site inventory list. This Facility is subject to all terms and conditions specified in this plan approval. Nothing in this plan approval relieves the permittee from its obligations to comply with all applicable Federal, State and Local laws and regulations.

The regulatory or statutory authority for each plan approval condition is set forth in brackets. All terms and conditions in this permit are federally enforceable unless otherwise designated as "State-Only" requirements.

Plan Approval No. 40-00134C

Federal Tax Id - Plant Code: 36-4714537-1

Owner Information

Name: NOVAE LLC

Mailing Address: 1 NOVAE PKWY  
MARKLE, IN 46770-9087

Plant Information

Plant: NOVAE LLC

Location: 40 Luzerne County 40972 Wright Township  
SIC Code: 3799 Manufacturing - Transportation Equipment, Nec

Responsible Official

Name: RANDY HINOJOSA

Title: CORP ENV COMPLIANCE MGR

Phone: (260) 758 - 9838

Email: randy.hinojosa@novae.com

Plan Approval Contact Person

Name: DIANE DONOVAN

Title: PLT MGR

Phone: (570) 474 - 1280 Ext.6103

Email: diane.donovan@novae.com

[Signature] \_\_\_\_\_

MARK J. WEJKSZNER, NORTHEAST REGION AIR PROGRAM MANAGER



#### Plan Approval Description

This plan approval application is for the modification to existing Source 200, to be utilized as a wash station and a 2-Part Polyurethane coating application using a flow coater, and the addition of paint booth Source 202 to apply undercoating by airless spray guns. Proposed Source ID 202 will be controlled by an air bench exhaust filtration system using disposable polyester dry fiber paint arrestor pads.



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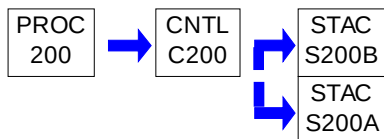
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**SECTION A. Plan Approval Inventory List**

| Source ID | Source Name         | Capacity/Throughput | Fuel/Material |
|-----------|---------------------|---------------------|---------------|
| 200       | SPRAY BOOTH         |                     |               |
| 202       | SPRAY BOOTH         |                     |               |
| C200      | PANEL FILTERS       |                     |               |
| C202      | PANEL FILTERS       |                     |               |
| S200A     | SPRAY BOOTH STACK A |                     |               |
| S200B     | SPRAY BOOTH STACK B |                     |               |
| S202      | STACK               |                     |               |

**PERMIT MAPS**

**SECTION B. General Plan Approval Requirements****#001 [25 Pa. Code § 121.1]****Definitions**

Words and terms that are not otherwise defined in this plan approval shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and 25 Pa. Code § 121.1.

**#002 [25 Pa. Code § 127.12b (a) (b)]****Future Adoption of Requirements**

The issuance of this plan approval does not prevent the future adoption by the Department of any rules, regulations or standards, or the issuance of orders necessary to comply with the requirements of the Federal Clean Air Act or the Pennsylvania Air Pollution Control Act, or to achieve or maintain ambient air quality standards. The issuance of this plan approval shall not be construed to limit the Department's enforcement authority.

**#003 [25 Pa. Code § 127.12b]****Plan Approval Temporary Operation**

This plan approval authorizes temporary operation of the source(s) covered by this plan approval provided the following conditions are met.

(a) When construction, installation, modification, or reactivation is being conducted, the permittee shall provide written notice to the Department of the completion of the activity approved by this plan approval and the permittee's intent to commence operation at least five (5) working days prior to the completion of said activity. The notice shall state when the activity will be completed and when the permittee expects to commence operation. When the activity involves multiple sources on different time schedules, notice is required for the commencement of operation of each source.

(b) Pursuant to 25 Pa. Code § 127.12b (d), temporary operation of the source(s) is authorized to facilitate the shakedown of sources and air cleaning devices, to permit operations pending the issuance of a permit under 25 Pa. Code Chapter 127, Subchapter F (relating to operating permits) or Subchapter G (relating to Title V operating permits) or to permit the evaluation of the air contaminant aspects of the source.

(c) This plan approval authorizes a temporary operation period not to exceed 180 days from the date of commencement of operation, provided the Department receives notice from the permittee pursuant to paragraph (a), above.

(d) The permittee may request an extension of the 180-day shakedown period if further evaluation of the air contamination aspects of the source(s) is necessary. The request for an extension shall be submitted, in writing, to the Department at least 30 days prior to the end of the initial 180-day shakedown period and shall provide a description of the compliance status of the source, a detailed schedule for establishing compliance, and the reasons compliance has not been established. This temporary operation period will be valid for a limited time and may be extended for additional limited periods, each not to exceed 180 days.

(e) The notice submitted by the permittee pursuant to subpart (a) above, prior to the expiration of the plan approval, shall modify the plan approval expiration date on Page 1 of this plan approval. The new plan approval expiration date shall be 180 days from the date of commencement of operation.

**#004 [25 Pa. Code § 127.12(a) (10)]****Content of Applications**

The permittee shall maintain and operate the sources and associated air cleaning devices in accordance with good engineering practice as described in the plan approval application submitted to the Department.

**#005 [25 Pa. Code §§ 127.12(c) and (d) & 35 P.S. § 4013.2]****Public Records and Confidential Information**

(a) The records, reports or information obtained by the Department or referred to at public hearings shall be available to the public, except as provided in paragraph (b) of this condition.

(b) Upon cause shown by the permittee that the records, reports or information, or a particular portion thereof, but not emission data, to which the Department has access under the act, if made public, would divulge production or sales figures or methods, processes or production unique to that person or would otherwise tend to affect adversely the

**SECTION B. General Plan Approval Requirements**

competitive position of that person by revealing trade secrets, including intellectual property rights, the Department will consider the record, report or information, or particular portion thereof confidential in the administration of the act. The Department will implement this section consistent with sections 112(d) and 114(c) of the Clean Air Act (42 U.S.C.A. § 7412(d) and 7414(c)). Nothing in this section prevents disclosure of the report, record or information to Federal, State or local representatives as necessary for purposes of administration of Federal, State or local air pollution control laws, or when relevant in a proceeding under the act.

**#006 [25 Pa. Code § 127.12b]****Plan Approval terms and conditions.**

[Additional authority for this condition is derived from 25 Pa. Code Section 127.13]

(a) This plan approval will be valid for a limited time, as specified by the expiration date contained on Page 1 of this plan approval. Except as provided in § § 127.11a and 127.215 (relating to reactivation of sources; and reactivation), at the end of the time, if the construction, modification, reactivation or installation has not been completed, a new plan approval application or an extension of the previous approval will be required.

(b) If construction has commenced, but cannot be completed before the expiration of this plan approval, an extension of the plan approval must be obtained to continue construction. To allow adequate time for departmental action, a request for the extension shall be postmarked at least thirty (30) days prior to the expiration date. The request for an extension shall include the following:

- (i) A justification for the extension,
- (ii) A schedule for the completion of the construction

If construction has not commenced before the expiration of this plan approval, then a new plan approval application must be submitted and approval obtained before construction can commence.

(c) If the construction, modification or installation is not commenced within 18 months of the issuance of this plan approval or if there is more than an 18-month lapse in construction, modification or installation, a new plan approval application that meets the requirements of 25 Pa. Code Chapter 127, Subchapter B (related to plan approval requirements), Subchapter D (related to prevention of significant deterioration of air quality), and Subchapter E (related to new source review) shall be submitted. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified.

**#007 [25 Pa. Code § 127.32]****Transfer of Plan Approvals**

(a) This plan approval may not be transferred from one person to another except when a change of ownership is demonstrated to the satisfaction of the Department and the Department approves the transfer of the plan approval in writing.

(b) Section 127.12a (relating to compliance review) applies to a request for transfer of a plan approval. A compliance review form shall accompany the request.

(c) This plan approval is valid only for the specific source and the specific location of the source as described in the application.

**#008 [25 Pa. Code § 127.12(a)(4) & 35 P.S. § 4008 & § 114 of the CAA]****Inspection and Entry**

(a) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act.

(b) The permittee shall also allow the Department to have access at reasonable times to said sources and associated air cleaning devices with such measuring and recording equipment, including equipment recording visual observations, as the Department deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act and regulations adopted under the act.

**SECTION B. General Plan Approval Requirements**

(c) Nothing in this plan approval condition shall limit the ability of the Environmental Protection Agency to inspect or enter the premises of the permittee in accordance with Section 114 or other applicable provisions of the Clean Air Act.

**#009 [25 Pa. Code 127.13a]****Plan Approval Changes for Cause**

This plan approval may be terminated, modified, suspended or revoked and reissued if one or more of the following applies:

(a) The permittee constructs or operates the source subject to the plan approval in violation of the act, the Clean Air Act, the regulations promulgated under the act or the Clean Air Act, a plan approval or permit or in a manner that causes air pollution.

(b) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.

(c) The permittee fails to submit a report required by this plan approval.

(d) The Environmental Protection Agency determines that this plan approval is not in compliance with the Clean Air Act or the regulations thereunder.

**#010 [25 Pa. Code §§ 121.9 & 127.216]****Circumvention**

(a) The permittee, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application.

(b) No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of this plan approval, the Air Pollution Control Act or the regulations promulgated thereunder, except that with prior approval of the Department, the device or technique may be used for control of malodors.

**#011 [25 Pa. Code § 127.12c]****Submissions**

Reports, test data, monitoring data, notifications shall be submitted to the:

Regional Air Program Manager

PA Department of Environmental Protection

(At the address given on the plan approval transmittal letter or otherwise notified)

**#012 [25 Pa. Code § 127.12(a)(9) & 40 CFR Part 68]****Risk Management**

(a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions) and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act (P.L. 106-40).

(b) The permittee shall prepare and implement a Risk Management Plan (RMP) which meets the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68 and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act when a regulated substance listed in 40 CFR § 68.130 is present in a process in more than the listed threshold quantity at the facility. The permittee shall submit the RMP to the Environmental Protection Agency according to the following schedule and requirements:

(1) The permittee shall submit the first RMP to a central point specified by the Environmental Protection Agency no later than the latest of the following:

**SECTION B. General Plan Approval Requirements**

- (i) Three years after the date on which a regulated substance is first listed under § 68.130; or,
- (ii) The date on which a regulated substance is first present above a threshold quantity in a process.

(2) The permittee shall submit any additional relevant information requested by the Department or the Environmental Protection Agency concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 CFR § 68.190.

(3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 CFR Part 68, including a checklist addressing the required elements of a complete RMP.

(c) As used in this plan approval condition, the term "process" shall be as defined in 40 CFR § 68.3. The term "process" means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.

**#013 [25 Pa. Code § 127.25]****Compliance Requirement**

A person may not cause or permit the operation of a source subject to § 127.11 (relating to plan approval requirements), unless the source and air cleaning devices identified in the application for the plan approval and the plan approval issued to the source, are operated and maintained in accordance with specifications in the application and conditions in the plan approval issued by the Department. A person may not cause or permit the operation of an air contamination source subject to this chapter in a manner inconsistent with good operating practices.

**SECTION C. Site Level Plan Approval Requirements****I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

(a) No person may permit the emission into the outdoor atmosphere of fugitive air contaminant from a source other than the following:

- (1) Construction or demolition of buildings or structures.
- (2) Grading, paving and maintenance of roads and streets.
- (3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.
- (4) Clearing of land.
- (5) Stockpiling of materials.
- (6) Open burning operations.
- (7) - (8) N/A
- (9) Sources and classes of sources other than those identified in paragraphs (1)-(8), for which the operator has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
  - (i) the emissions are of minor significance with respect to causing air pollution; and
  - (ii) the emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

**# 002 [25 Pa. Code §123.2]****Fugitive particulate matter**

No person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in Section C, Condition #001 if such emissions are visible at the point the emissions pass outside the person's property.

**# 003 [25 Pa. Code §123.31]****Limitations**

The permittee shall not permit the emissions into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.

**# 004 [25 Pa. Code §123.41]****Limitations**

A person may not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following:

- (1) Equal to or greater than 20% for a period or periods aggregating more than three minutes in any 1 hour.
- (2) Equal to or greater than 60% at any time.

**# 005 [25 Pa. Code §123.42]****Exceptions**

The limitations of Section C, Condition #004 shall not apply to a visible emission in any of the following instances:

- (1) When the presence of uncombined water is the only reason for failure of the emission to meet the limitations.
- (2) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.

**SECTION C. Site Level Plan Approval Requirements**

(3) When the emission results from sources specified in Section C, Condition #001.

**# 006 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

(a) The VOC emissions for the facility shall be limited to less than 50 tons per year based on a 12-month rolling sum.

(b) The Hazardous Air Pollutant (HAP) emissions shall be limited to less than 10 tons of any individual HAP, and less than 25 ton of a combination of HAP's based on a 12-month rolling sum.

**# 007 [25 Pa. Code §129.52d]****Control of VOC emissions from miscellaneous metal parts surface coating processes, miscellaneous plastic parts sur**

Pursuant to 25 Pa. Code §129.52d, the facility shall use coatings as applied which contains the weight of VOCs (volatile organic compounds) per volume of coating solids is equal to or less than the level specified in Table I of §129.52d for the respective application.

**II. TESTING REQUIREMENTS.****# 008 [25 Pa. Code §139.14]****Emissions of VOCs.**

At the request of the Department the permittee shall perform testing of all VOC based coatings in accordance with Reference Method 24, 40 CFR Part 60, Appendix A, and 25 PA, Code 139.14(a)(1).

**# 009 [25 Pa. Code §139.14]****Emissions of VOCs.**

The permittee shall comply with one of the following:

(1) The permittee shall perform annual testing on all coatings in accordance with reference method 24, 40 CFR Part 60, Appendix A, and 25 Pa., Code 139.14a)(1).

(2) The permittee shall obtain certifications of reference method 24, 40 CFR Part 60, Appendix A directly from the coating manufacturers or suppliers of each coating. These certifications shall be obtained each year and each time the manufacturer or supplier changes.

**III. MONITORING REQUIREMENTS.****# 010 [25 Pa. Code §123.43]****Measuring techniques**

Visible emissions may be measured using either of the following:

(1) A device approved by the Department and maintained to provide accurate opacity measurements.

(2) Observers, trained and qualified to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.

**# 011 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

(a) A visual inspection of the facility shall be performed on a weekly basis to determine if visible emissions and fugitive emissions are detectable outside the plant.

(b) Visible emissions may be measured according to the methods specified in Section C, Condition #010, or alternatively, plant personnel who observe any visible emissions will report the incident of visible emissions to the Department within four (4) hours of each incident and make arrangements for a certified observer to verify the opacity of the visible emissions.

**SECTION C. Site Level Plan Approval Requirements****IV. RECORDKEEPING REQUIREMENTS.****# 012 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

On a monthly basis the permittee shall:

- (a) Update the VOC emissions and calculate the annual VOC emission based on a 12-month rolling sum.
- (b) Update the Hazardous Air Pollutants (HAP) emissions and calculate the annual HAP's emission based on a 12-month rolling sum.
- (c) Calculate the total usage of each coating to include weight of VOC/gal., including any organic compound (VOC) solvents.

**# 013 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The facility shall keep on hand chemical composition data for all of the coatings used in the paint spray booths, and shall record on a daily basis the amount of these coatings and any volatile organic compound (VOC) solvent or thinner usage.

**# 014 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

- (a) The facilities emissions shall be updated monthly and maintained on a 12-month rolling sum.
- (b) All records shall be maintained for a minimum of 5 years.

**# 015 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall maintain a record of all reports of fugitive and visible emissions and the corrective action taken to abate the deviation or prevent future occurrences.

**V. REPORTING REQUIREMENTS.****# 016 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

[Authority for this condition is also derived from 25 Pa Code, Section 129.95]

The permittee shall report on a quarterly basis the total VOC emissions emitted, the total usage of each coating to include weight of VOC/gal., any organic compound (VOC) solvents, fuel usage, and any maintenance/calibration checks performed on all equipment which is subject to this permit.

**# 017 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee, within one (1) hour of discovery of an occurrence, shall notify the Department (either by phone at 570-826-2511, facsimile at 570-826-2357, or email to the Regional Air Manager) of any malfunction, recordkeeping or reporting error, or other possible non-compliance issue, which reasonably is believed to either result in, or possibly be resulting in, the emission of air contaminants in excess of the limitations specified in, or established pursuant to, any applicable rule or regulations contained in Article III of the Rules and Regulations of the Department of Environmental Protection.

A written report shall be submitted to the Department within five (5) working days following the initial notification describing the incident and the corrective actions taken or to be taken. The Department may take enforcement action for any violations of the applicable standards.

**# 018 [25 Pa. Code §135.3]****Reporting**

- (a) A person who owns or operates a source to which this chapter applies, and who has previously been advised by the Department to submit a source report, shall submit by March 1 of each year a source report for the preceding calendar year. The report shall include information for all previously reported sources, new sources which were first operated during the preceding calendar year and sources modified during the same period which were not previously reported.
- (b) A person who receives initial notification by the Department that a source report is necessary shall submit an initial source report within 60 days after receiving the notification or by March 1 of the year following the year for which the report is

**SECTION C. Site Level Plan Approval Requirements**

required, whichever is later.

(c) A source owner or operator may request an extension of time from the Department for the filing of a source report, and the Department may grant the extension for reasonable cause.

**VI. WORK PRACTICE REQUIREMENTS.****# 019 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

The permittee shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

- (1) Use, where possible, of water or chemicals for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land.
- (2) Application of asphalt, oil, water or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.
- (3) Paving and maintenance of roadways.
- (4) Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or other means.

**# 020 [25 Pa. Code §123.2]****Fugitive particulate matter**

The permittee shall prevent fugitive particulate matter by the application of water on the roadways and sweeping of roads.

**# 021 [25 Pa. Code §129.14]****Open burning operations**

(a) No person may permit the open burning of material in an area outside of air basins in a manner that:

- (1) The emissions are visible, at any time, at the point such emissions pass outside the property of the person on whose land the open burning is being conducted.
- (2) Malodorous air contaminants from the open burning are detectable outside the property of the person on whose land the open burning is being conducted.
- (3) The emissions interfere with the reasonable enjoyment of life or property.
- (4) The emissions cause damage to vegetation or property.
- (5) The emissions are or may be deleterious to human or animal health.

(b) Exceptions: The requirements of subsection (a) does not apply where the open burning operations result from:

- (1) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.
- (2) A fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.
- (3) A fire set for the prevention and control of disease or pests, when approved by the Department.
- (4) A fire set in conjunction with the production of agricultural commodities in their unmanufactured state on the premises of the farm operation.
- (5) A fire set for the purpose of burning domestic refuse, when the fire is on the premises of a structure occupied solely as a dwelling by two families or less and when the refuse results from the normal occupancy of such structure.



## SECTION C. Site Level Plan Approval Requirements

(6) A fire set solely for recreational or ceremonial purposes.

(7) A fire set solely for cooking food.

### VII. ADDITIONAL REQUIREMENTS.

**# 022 [25 Pa. Code §127.12b]**

**Plan approval terms and conditions.**

(a) The permittee shall not perform paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), Chemical Abstract Service number 75092, in paint removal processes

(b) The permittee shall not perform spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

### VIII. COMPLIANCE CERTIFICATION.

No additional compliance certifications exist except as provided in other sections of this plan approval including Section B (relating to Plan Approval General Requirements).

### IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

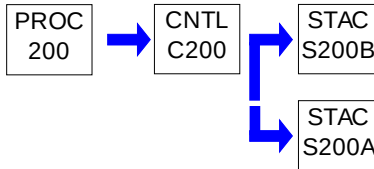
**SECTION D. Source Level Plan Approval Requirements**

Source ID: 200

Source Name: SPRAY BOOTH

Source Capacity/Throughput:

Conditions for this source occur in the following groups: GROUP 1

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

**III. MONITORING REQUIREMENTS.**

No additional monitoring requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

**IV. RECORDKEEPING REQUIREMENTS.**

No additional record keeping requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

**VI. WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

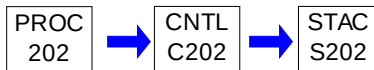
**SECTION D. Source Level Plan Approval Requirements**

Source ID: 202

Source Name: SPRAY BOOTH

Source Capacity/Throughput:

Conditions for this source occur in the following groups: GROUP 1

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

**III. MONITORING REQUIREMENTS.**

# 001 [25 Pa. Code §127.12b]

**Plan approval terms and conditions.**

The permittee shall install and maintain a pressure monitoring device to ensure that the booth is ventilated at negative pressure.

**IV. RECORDKEEPING REQUIREMENTS.**

# 002 [25 Pa. Code §127.12b]

**Plan approval terms and conditions.**

The permittee shall record the pressure differential of the booth once per operating day to ensure the booth is ventilated at negative pressure.

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

**VI. WORK PRACTICE REQUIREMENTS.**

# 003 [25 Pa. Code §127.12b]

**Plan approval terms and conditions.**

The permittee shall ventilate the spray booth at negative pressure so that air is drawn into any openings in the booth curtains.

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

**SECTION E. Source Group Plan Approval Restrictions.**

Group Name: GROUP 1

Group Description: Surface Coating

**Sources included in this group**

| ID   | Name          |
|------|---------------|
| 200  | SPRAY BOOTH   |
| 202  | SPRAY BOOTH   |
| C200 | PANEL FILTERS |
| C202 | PANEL FILTERS |

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §123.13]****Processes**

No person may permit the emission into the outdoor atmosphere of particulate matter in a manner that the concentration of particulate matter in the effluent gas exceeds any of the following:

- (i) 0.04 grain per dry standard cubic foot.

**# 002 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The VOC standards do not apply to a coating used exclusively for determining product quality and commercial acceptance, touch-up and repair and other small quantity coatings if the coating meets the following criteria:

- (1) The quantity of coating used does not exceed 50 gallons per year for a single coating and a total of 200 gallons per year for all coatings combined for the facility.
- (2) The owner or operator of the facility requests, in writing, and the Department approves, in writing, the exemption prior to use of the coating.

**# 003 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

Pursuant to 25 Pa. Code §129.52d, the VOC content of each coating, as applied, excluding water and exempt compounds, shall be equal to or less than 3.5 lb VOC/gal coating.

**# 004 [25 Pa. Code §129.77.]****Control of emissions from the use or application of adhesives, sealants, primers and solvents.**

The company shall not use or apply an adhesive or sealant products containing more than 0.3 lb VOC/gal less water and exempt compounds at the facility.

**II. TESTING REQUIREMENTS.****# 005 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall use one of the following procedures to demonstrate compliance with the requirements for VOCs contained in coatings:

- (1) The permittee shall perform annual testing on all coatings as applied in accordance with reference method 24, 40 CFR Part 60, Appendix A, and 25 Pa. Code 139.14(a)(1).

- (2) The permittee shall obtain certifications of reference Method 24, 40 CFR Part 60, Appendix A directly from the coating manufacturers or suppliers of each coating. These certifications shall be obtained each year and each time the manufacturer or supplier changes.

**# 006 [25 Pa. Code §129.77.]****Control of emissions from the use or application of adhesives, sealants, primers and solvents.**

The VOC and solids content of nonaerosol adhesives (including one-part moisture cure urethane adhesives and silicone

**SECTION E. Source Group Plan Approval Restrictions.**

adhesives), sealants, adhesive primers, sealant primers, surface preparation solvents and cleanup solvents shall be determined using one of the following:

(1) EPA Reference Method 24, Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings, found at 40 CFR 60, Subpart D, Appendix A, including updates and revisions.

(2) SCAQMD Method 304, Determination of Volatile Organic Compounds (VOC) in Various Materials, SCAQMD, 21865 Copley Drive, Diamond Bar, CA 91765 USA, including updates and revisions.

**# 007 [25 Pa. Code §129.77.]****Control of emissions from the use or application of adhesives, sealants, primers and solvents.**

The weight volatile matter content and weight solids content for one-part or multiple part reactive adhesives, except one-part moisture cure urethane adhesives and silicone adhesives, shall be determined using the EPA Reference Method, Determination of Weight Volatile Matter Content and Weight Solids Content of Reactive Adhesives, found at 40 CFR 63 Subpart PPPP, Appendix A, including updates and revisions.

**# 008 [25 Pa. Code §129.77.]****Control of emissions from the use or application of adhesives, sealants, primers and solvents.**

(a) The identity and concentration of exempt organic compounds shall be determined using one of the following:

(1) ASTM D4457, Standard Test Method for Determination of Dichloromethane and 1,1,1-Trichloroethane in Paints and Coatings by Direct Injection into a Gas Chromatograph, ASTM International, 100 Barr Harbor Drive, P. O. Box C700, West Conshohocken, PA 19428-2959 USA including updates and revisions.

(2) SCAQMD Method 303, Determination of Exempt Compounds, SCAQMD, 21865 Copley Drive, Diamond Bar, CA 91765 USA, including updates and revisions.

(b) The VOC content of a plastic cement welding adhesive or primer shall be determined using SCAQMD Method 316A, Determination of Volatile Organic Compounds (VOC) in Materials Used for Pipes and Fittings, SCAQMD, 21865 Copley Drive, Diamond Bar, CA 91765 USA, including updates and revisions.

(c) To determine if a diluent is a reactive diluent, the percentage of the reactive organic compound that becomes an integral part of the finished material shall be determined using SCAQMD Method 316A, Determination of Volatile Organic Compounds (VOC) in Materials Used for Pipes and Fittings, SCAQMD, 21865 Copley Drive, Diamond Bar, CA 91765 USA, including updates and revisions.

**III. MONITORING REQUIREMENTS.****# 009 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The company shall ensure that the spray booths are equipped with the applicable monitoring equipment (pressure drop gauge) and the monitoring equipment are installed, calibrated, operated, and maintained according to the vendor's specifications at all times the spray booths are in use.

**# 010 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The company shall monitor the pressure drop of paint booth filters on a daily basis while the sources are in operation.

**IV. RECORDKEEPING REQUIREMENTS.****# 011 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The company shall maintain records in accordance with the recordkeeping requirements of this operating permit and shall include as a minimum the following:

(a) The records shall provide sufficient data to clearly demonstrate that the requirement of VOC content limitations as specified in condition above for each coatings are met.

(b) The company shall keep adequate records to verify daily coating usage, the coating density before and after addition of diluents, the gallons diluents used and the density of the diluents, the gallons of water contained in the coating and the

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weight of the organic volatiles in the coating.

(c) The company shall maintain records of the total gallons of coating, gluing, sealer, cleaning, and washoff materials used each month, and upon request submit such records to the Department. These records shall be maintained for five years.

**# 012 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall keep on hand chemical composition data for all of the coatings used in the paint spray booth, and shall record on a daily basis the amount of these coatings and any volatile organic compound (VOC) solvent or thinner usage for the booth.

**# 013 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

A facility, regardless of the facility's annual emission rate, which contains surface coating processes shall maintain records sufficient to demonstrate compliance with this section. At a minimum, a facility shall maintain daily records of the gallons of coating used, the coating density before and after addition of diluents, the gallons of diluents used and the density of the diluents, the gallons of water contained in the coating and the weight percent of the organic volatiles in the coating. The records shall be maintained for 5 years and shall be submitted to the Department on a schedule reasonably prescribed by the Department.

**# 014 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

(a) Records shall be maintained indicating when filters are replaced.

(b) These records shall be kept for a five (5) year minimum period and shall be made available to the Department upon request.

**# 015 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

(a) The facility shall keep records to verify compliance with the volatile organic compound content of coatings as specified in 25 Pa. Code Sections 129.52d.

(b) These records shall be kept for a five (5) year minimum period and be made available to the Department upon request.

**# 016 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

(1) The company shall maintain a file containing all records and other data that are required to be collected pursuant to the various provisions of this operating permit. The file shall include, but not be limited to: all air pollution control systems performance evaluations and records of calibration checks, adjustments and maintenance performed on all equipment which is subject to this operating permit. All measurements, records and other data required to be maintained by the company shall be retained for at least two years following the date on which such measurements, records or data are recorded.

(2) The company shall record the pressure drop across the spray booth. At a minimum these recordings shall be taken once per day, while the source and collector(s) is in operation. The recordings shall be maintained in a logbook and made available to the Department upon request.

**# 017 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall keep up-to-date records of Certified Product Data Sheets (CPDSs) or Material Safety Data Sheets (MSDSs) that identify the volatile organic compound (VOC) content and hazardous air pollutant (HAP) content of each VOC and/or HAP containing material used at the facility.

**# 018 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

(a) The permittee shall keep records of the supporting calculations on a monthly basis for VOCs, and HAPs emissions from all sources at the facility in any 12 consecutive month period.

(b) These records shall be retained for a minimum of five (5) years and shall be made available to the Department upon request.

**SECTION E. Source Group Plan Approval Restrictions.****# 019 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall keep records showing the coating, thinner, and cleaning solvent usage and VOC emissions on a 12-month rolling sum.

**# 020 [25 Pa. Code §129.52d]****Control of VOC emissions from miscellaneous metal parts surface coating processes, miscellaneous plastic parts surface coating processes and pleasure craft surface coatings.**

(f) Recordkeeping and reporting requirements.

(1) The owner or operator of a miscellaneous metal part coating unit or miscellaneous plastic part coating unit, or both, subject to subsection (a)(1) shall maintain monthly records sufficient to demonstrate compliance with this section. The records must include the following information:

(i) The following parameters for each coating, thinner, component and cleaning solvent as supplied:

(A) Name and identification number of the coating, thinner, other component or cleaning solvent.

(B) Volume used.

(C) Mix ratio.

(D) Density or specific gravity.

(E) Weight percent of total volatiles, water, solids and exempt solvents.

(F) Volume percent of total volatiles, water and exempt solvents for the applicable table of limits in Tables I—V.

(G) Volume percent of solids for the applicable table of limits in Tables VI—IX.

(ii) The VOC content of each coating, thinner, other component and cleaning solvent as supplied.

(iii) The VOC content of each as applied coating or cleaning solvent.

(iv) The calculations performed for each applicable requirement under subsections (d) and (e).

(v) The information required in a plan approval issued under subsection (e)(2).

(2) An owner or operator subject to subsection (a)(2), or otherwise claiming an exemption or exception in this section, shall maintain records sufficient to verify the applicability of subsection (a)(2), the exemption or exception. Records maintained for compliance demonstrations may include purchase, use, production and other records.

(3) The records shall be maintained onsite for 2 years, unless a longer period is required by an order, plan approval or operating permit issued under Chapter 127 (relating to construction, modification, reactivation and operation of sources).

(4) The records shall be submitted to the Department in an acceptable format upon receipt of a written request from the Department.

**# 021 [25 Pa. Code §129.77.]****Control of emissions from the use or application of adhesives, sealants, primers and solvents.**

The company shall keep following records.

(1) A list of each adhesive, sealant, adhesive primer, sealant primer, surface preparation solvent and cleanup solvent product in use and in storage.

(2) A data sheet or material list which provides the product name, manufacturer identification and use or material application for each product included on the list required under paragraph (1).

**SECTION E. Source Group Plan Approval Restrictions.**

(3) The VOC content of each product on the list required under paragraph (1), as supplied.

(4) Catalysts, reducers or other components used and the mix ratio.

(5) The VOC content or vapor pressure of each product on the list required by paragraph (1), as applied, if solvent or other VOC is added to the product before application.

(6) The volume purchased or produced of each product on the list required under paragraph (1).

(7) The monthly volume used or applied as part of a manufacturing process at the facility of each product on the list required under paragraph (1).

**V. REPORTING REQUIREMENTS.****# 022 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

Any changes in the location of the aforementioned source, or any changes in the process or control equipment would be consider a modification and would require the submittal of an amended application for plan approval in accordance with the provisions of 25 PA Code 127.11 and 127.12.

**# 023 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

Any notification as a result of any condition herein should be directed to:

Mark J Wejksner, P.E.  
Air Quality Program Manager  
Department of Environmental Protection  
2 Public Square  
Wilkes-Barre, PA 18701-1915

**VI. WORK PRACTICE REQUIREMENTS.****# 024 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

(1) The aforementioned source(s) may only be operated as long as the associated air pollution control device(s) are operated and maintained in accordance with the specifications set forth in the respective operating permit, and the application submitted for said operating permit (as approved by the Department), and in accordance with any conditions set forth herein.

(2) The permittee shall keep on hand a sufficient quantity of spare filters associated with the aforementioned source(s) in order to be able to immediately replace any filters requiring replacement due to deterioration resulting from routine operation of the source(s).

(3) The company shall maintain and operates the air pollution control equipment and sources in accordance with good engineering practice.

**# 025 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

All clean-up solvent operations must comply with Best Available Technology to minimize VOC emissions. All cleaning operations must store new and used cleaning solvents in closed containers. A record of the quantity of all VOC's used in clean-up operations must be calculated on a monthly basis (12-month rolling sum).

**# 026 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

(a) Paint booth filters shall be replaced as per manufacturer's specifications.

(b) Only airless sprayguns or flow coaters are to be used for coating application in the spray booths.

**# 027 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

**SECTION E. Source Group Plan Approval Restrictions.**

The source and any associated air cleaning devices shall be:

- (1) Operated in such a manner as not to cause air pollution.
- (2) Operated and maintained in a manner consistent with good operating and maintenance practices.
- (3) Operated and maintained in accordance with manufacturer's specifications.

**# 028 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

Spray guns must be cleaned in a device that minimizes solvent evaporation during cleaning, rinsing, and draining operations. The device must be capable of recirculating solvent during cleaning so it can be reused and collecting the spent solvent in an enclosed system for proper disposal or recycling.

**# 029 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

Spray booth filters must include sufficient layers of dry fiber mat to achieve a particulate control efficiency of at least 98% by weight. Filter material must be maintained and disposed in accordance with all applicable DEP regulations.

**# 030 [25 Pa. Code §129.52d]****Control of VOC emissions from miscellaneous metal parts surface coating processes, miscellaneous plastic parts surface coating processes and pleasure craft surface coatings.**

(i) Work practice requirements for coating-related activities. The owner or operator of a miscellaneous metal part coating unit or miscellaneous plastic part coating unit, or both, subject to subsection (a)(1) shall comply with the following work practices for coating-related activities:

- (1) Store all VOC-containing coatings, thinners or coating-related waste materials in closed containers.
- (2) Ensure that mixing and storage containers used for VOC-containing coatings, thinners or coating-related waste materials are kept closed at all times, except when depositing or removing these coatings, thinners or waste materials.
- (3) Minimize spills of VOC-containing coatings, thinners or coating-related waste materials and clean up spills immediately.
- (4) Convey VOC-containing coatings, thinners or coating-related waste materials from one location to another in closed containers or pipes.

(j) Work practice requirements for cleaning materials. The owner or operator of a miscellaneous metal part coating unit or miscellaneous plastic part coating unit subject to subsection (a)(1) shall comply with the following work practices for cleaning materials:

- (1) Store all VOC-containing cleaning materials and used shop towels in closed containers.
- (2) Ensure that mixing vessels and storage containers used for VOC-containing cleaning materials are kept closed at all times except when depositing or removing these materials.
- (3) Minimize spills of VOC-containing cleaning materials and clean up spills immediately.
- (4) Convey VOC-containing cleaning materials from one location to another in closed containers or pipes.
- (5) Minimize VOC emissions from cleaning of application, storage, mixing or conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

(k) Measurements and calculations. To determine the properties of a coating or component used in a miscellaneous metal parts surface coating process or miscellaneous plastic parts surface coating process, measurements and calculations shall be performed according to one or more of the following:

**SECTION E. Source Group Plan Approval Restrictions.**

- (1) EPA Reference Method 24, Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings, found at 40 CFR Part 60, Subpart D, Appendix A, including updates and revisions.
- (2) Manufacturer's formulation data.
- (3) Sampling and testing done in accordance with the procedures and test methods specified in Chapter 139.
- (4) Other test method demonstrated to provide results that are acceptable for purposes of determining compliance with this section if prior approval is obtained in writing from the Department.
- (5) Add-on air pollution control devices shall be equipped with the applicable monitoring equipment according to manufacturers' specifications. The monitoring equipment shall be installed, calibrated, operated and maintained according to manufacturers' specifications at all times the add-on air pollution control device is in use.
- (6) EPA calculations information in the following:
  - (i) A Guideline for Surface Coating Calculations, EPA-340/1-86-016, including updates and revisions.
  - (ii) Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings, EPA-450/3-84-019, including updates and revisions.

**VII. ADDITIONAL REQUIREMENTS.****# 031 [25 Pa. Code §129.77.]****Control of emissions from the use or application of adhesives, sealants, primers and solvents.**

(e) An owner or operator of a facility subject to this section using or applying a surface preparation solvent or cleanup solvent at the facility may not:

(1) Except as provided in paragraph (2) for single-ply roof membrane, use materials containing VOCs for surface preparation, unless the VOC content of the surface preparation solvent is less than 70 grams per liter of material or 0.6 pound of VOC per gallon of material.

(2) Use materials containing VOCs for surface preparation or cleanup when applying single-ply roof membrane, unless the composite partial vapor pressure, excluding water and exempt compounds, of the surface preparation solvent or cleanup solvent is less than or equal to 45 mm mercury at 20° C.

(3) Except as provided in subsection (b), use cleanup solvent materials containing VOCs for the removal of adhesives, sealants, adhesive primers or sealant primers from surfaces, other than from the parts of spray application equipment, unless the composite partial vapor pressure of the solvent is less than or equal to 45 mm mercury at 20° C.

(f) Removal of an adhesive, sealant, adhesive primer or sealant primer from the parts of spray application equipment shall be performed by one or more of the following methods:

(1) Using an enclosed cleaning system, or an equivalent cleaning system as determined by the test method identified in subsection below.

(2) Using a solvent with a VOC content less than or equal to 70 grams of VOC per liter of material or 0.6 pound of VOC per gallon of material.

(3) Soaking parts containing dried adhesive in a solvent if the composite partial vapor pressure of the solvent, excluding water and exempt compounds, is less than or equal to 9.5 mm mercury at 20° C and the parts and solvent are in a closed container that remains closed except when adding parts to or removing parts from the container.

(h) An owner or operator of a facility subject to this section shall store or dispose of all absorbent materials, including cloth or paper, which are moistened with adhesives, sealants, primers, surface preparation solvents or cleanup solvents subject to this section, in nonabsorbent containers at the facility that are kept closed except when placing materials in or removing materials from the container.

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(j) An owner or operator of a facility subject to this section who uses or applies an adhesive, sealant, adhesive primer or sealant primer subject to this section may not add solvent to the adhesive, sealant, adhesive primer or sealant primer in an amount in excess of the manufacturer's recommendation for application, if this addition causes the adhesive, sealant, adhesive primer or sealant primer to exceed the applicable VOC content limit.

(n) This section does not apply to the use or application of a noncomplying adhesive, sealant, adhesive primer, sealant primer, surface preparation solvent or cleanup solvent if the total volume of noncomplying adhesives, sealants, primers, surface preparation and cleanup solvents used or applied facility-wide does not exceed 55 gallons per calendar year. An owner or operator of a facility claiming exemption under this subsection shall record and maintain operational records sufficient to demonstrate compliance with this exemption.

(z) The active and passive solvent losses from the use of an enclosed spray gun cleaning system or equivalent cleaning system, as listed above, shall be determined using the SCAQMD method, General Test Method for Determining Solvent Losses from Spray Gun Cleaning Systems, dated October 3, 1989, SCAQMD, 21865 Copley Drive, Diamond Bar, CA 91765 USA, including updates and revisions.

(1) The test solvent for this determination shall be a lacquer thinner with a minimum vapor pressure of 105 mm of mercury at 20° C.

(2) The minimum test temperature shall be 15° C.

(aa) Another test method may be used to determine the VOC or solids content of a product if the request for approval of the test method meets the following requirements:

(1) The request is submitted to the Department in writing.

(2) The request demonstrates that the test method provides results that accurately determine the concentration of VOCs in the product or its emissions.

(3) The Department approves the request in writing.

(bb) For adhesive, sealant, adhesive primer or sealant primer products that do not contain reactive diluents, grams of VOC per liter of product thinned to the manufacturer's recommendation, less water and exempt compounds, shall be calculated according to the following equation:

$$\text{Grams of VOC per liter of product, as applied} = \frac{W_s - W_w - W_e}{V_m - V_w - V_e}$$

Where:

Ws = weight of volatile compounds, in grams.

Ww = weight of water, in grams.

We = weight of exempt compounds, in grams.

Vm = volume of material, in liters.

Vw = volume of water, in liters.

Ve = volume of exempt compounds, in liters.

(cc) For adhesive, sealant, adhesive primer or sealant primer products that contain reactive diluents, the VOC content of the product is determined after curing. The grams of VOC per liter of product thinned to the manufacturer's recommendation, less water and exempt compounds, shall be calculated according to the following equation:

$$\text{Grams of VOC per liter of product, as applied} = \frac{W_{rs} - W_{rw} - W_{re}}{V_{rm} - V_{rw} - V_{re}}$$

Where:

Wrs = weight of volatile compounds not consumed during curing, in grams.

Wrw = weight of water not consumed during curing, in grams.

**SECTION E. Source Group Plan Approval Restrictions.**

Wre = weight of exempt compounds not consumed during curing, in grams.

Vrm = volume of material not consumed during curing, in liters.

Vrw = volume of water not consumed during curing, in liters.

Vre = volume of exempt compounds not consumed during curing, in liters.

(dd) For low-solids adhesive, sealant, adhesive primer or sealant primer products, grams of VOC per liter of product thinned to the manufacturer's recommendation, including the volume of water and exempt compounds, shall be calculated according to the following equation:

$$\text{Grams of VOC per liter of product, as applied} = \frac{Ws - Ww - We}{Vm}$$

Where:

Ws = weight of volatile compounds, in grams.

Ww = weight of water, in grams.

We = weight of exempt compounds, in grams.

Vm = volume of material, in liters.

(ee) Percent VOC by weight shall be calculated according to the following equation:

$$\% \text{ VOC by weight} = [(Ww/W)] \times 100$$

Where:

Ww = weight of VOCs, in grams.

W = weight of material, in grams.

(ff) To convert from grams per liter (g/l) to pounds per gallon (lb/gal), multiply the result (VOC content) by  $8.345 \times 10^{-3}$  (lb/gal/g/l).

**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this Plan Approval facility.

**SECTION G. Emission Restriction Summary.**

No emission restrictions listed in this section of the permit.



**SECTION H. Miscellaneous.**



\*\*\*\*\* End of Report \*\*\*\*\*

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