



Molded Fiber Glass Companies

Union City, Pennsylvania

55 4th Avenue

Union City, PA 16438-1247

December 22, 2022

Mr. Eric Gustafson
Northwest Regional Air Quality Program Manager
Pennsylvania Department of Environmental Protection
Northwest Regional Office
230 Chestnut Street
Meadville, PA 16335

**Re: Notification of RACT III Applicability [25 Pa. Code §129.115(a)] and Alternative RACT Compliance Analysis [25 Pa. Code §129.114(i)]
Molded Fiber Glass Companies
Union City, Pennsylvania
Title V Operating Permit No. 25-00035**

Dear Mr. Gustafson:

Molded Fiber Glass Companies (MFG) is providing this summary of Reasonably Available Control Technology (RACT) applicability and compliance plans for its reinforced plastic composite manufacturing operations located in Union City, Erie County, Pennsylvania (Facility) in accordance with the provisions of 25 Pa. Code §§129.111-129.115 (RACT III). This document is the notification of applicability and compliance proposal required under 25 Pa. Code §129.115(a). This document also includes the analysis required under 25 Pa. Code §129.114(i) for affected sources at the Facility that were previously approved by the Pennsylvania Department of Environmental Protection (PADEP) under 25 Pa. Code §129.99(e).

Facility Background and RACT III Applicability

MFG owns and operates a reinforced plastic composite manufacturing facility in Union City, Erie County. MFG operates the Facility under PADEP Title V Operating Permit (TVOP) No. 25-00035. PADEP published 25 Pa. Code §§129.111-129.115, “Additional RACT Requirements for Major Sources of NO_x and VOCs for the 2015 Ozone NAAQS,” on November 12, 2022. The RACT III requirements or emissions limitations supersede the requirements or emissions limitations of a RACT permit previously issued in accordance with 25 Pa. Code §§129.91-129.95 and/or 129.96-129.100, except in cases where an existing RACT permit specifies more stringent requirements and/or emissions limitations. Compliance with applicable RACT III requirements or emissions limitations must be demonstrated no later than January 1, 2023.

RACT III applies to major nitrogen oxides (NO_x) and/or major volatile organic compound (VOC) emitting facilities. 25 Pa. Code §121.1 defines major NO_x and VOC emitting facilities as follows:

- Major NO_x emitting facility – a facility-wide NO_x potential to emit (PTE) of greater than 100 tons per year (tpy)
- Major VOC emitting facility – a facility-wide VOC PTE of greater than 50 tpy

The facility-wide NO_x PTE is less than 100 tpy. Therefore, the Facility is not a major NO_x emitting facility and the NO_x provisions of RACT III do not apply under 25 Pa. Code §129.111(a). The facility-wide VOC PTE is currently greater than 50 tpy, and the Facility is a major VOC emitting facility subject to the VOC provisions of RACT III under 25 Pa. Code §129.111(a). Historical actual reported VOC emissions have been below 50 tpy VOC. In the Facility's TVOP renewal application, which is due by January 31, 2023, MFG intends to request a synthetic minor federally enforceable facility-wide emissions limit of 50 tpy of VOC. After the renewal permit is issued, MFG will not be classified as a major VOC emitting facility and therefore, will not be subject to the NO_x or VOC provisions of RACT III under 25 Pa. Code §129.111(a).

Notification of Applicability and Compliance Proposal [25 Pa. Code §129.115(a)]

The following subsections provide the notification of applicability and compliance proposal required under 25 Pa. Code §129.115(a).

25 Pa. Code §129.115(a)(1) – Submission Deadline

Because the Facility was a major VOC emitting facility prior to August 3, 2018, this submittal is being made on or before December 31, 2022 in accordance with 25 Pa. Code §129.115(a)(1)(i).

25 Pa. Code §129.115(a)(2) – Identification of Air Contamination Sources that Commenced Operation on or Before August 3, 2018

Table A-1 of Attachment A provides the RACT III Applicability Summary for the Facility. Sources that do not emit VOC are not subject to RACT III and are not identified in Table A-1. Table A-1 identifies the following:

- Air contamination sources that are exempt from 25 Pa. Code §§129.112-129.114 because they are already subject to certain 25 Pa. Code Chapter 129 RACT requirements [i.e., §§129.51, 129.52(a)-(k) and Table I categories 1-11, 129.52a-129.52e, 129.54-129.63a, 129.64-129.69, 129.71-129.75, 129.77, and 129.101-129.107].
- Air contamination sources that are exempt from 25 Pa. Code §§129.112-129.114 because they have a PTE less than 1 tpy of VOC.
- Air contamination sources that are subject to a presumptive RACT requirement or RACT emissions limitation under 25 Pa. Code §129.112.
- Air contamination sources that are subject to an alternative RACT requirement or RACT emissions limitation in accordance with 25 Pa. Code §129.114.

25 Pa. Code §129.115(a)(3) – Identification of Air Contamination Sources That Commenced Operation After August 3, 2018

Because the Facility was a major VOC emitting facility prior to August 3, 2018, 25 Pa. Code §129.111(b) does not apply.

25 Pa. Code §129.115(a)(4) – Identification of Air Contamination Sources That Emit Less Than 1 Ton Per Year

Table A-1 of Attachment A identifies the Facility’s air contamination sources that are exempt from RACT III on the basis that they emit less than 1 tpy of VOC.

25 Pa. Code §129.115(a)(5) – Air Contamination Source Information (Commenced Operation on or Before August 3, 2018)

Table A-2 of Attachment A provides an inventory that includes a description, including make and model (as available) of each RACT III affected source at the Facility. The applicable RACT requirement or RACT emissions limitation for each source is provided in the RACT III Applicability Summary as Table A-1 of Attachment A.

For Source IDs 101 (Gelcoat Operation), 102A (Non-Atomized Resin Application Mechanical), 102B (Non-Atomized Resin Application Mechanical and Manual), and 105 [Primer Spray Operation (3 Booths & 1 Flash Area)], MFG has determined that the alternative RACT requirements that were previously approved by PADEP under 25 Pa. Code §129.99(e) (RACT II) continue to be RACT for these sources. An analysis is provided below in accordance with 25 Pa. Code §129.114(i) to certify that the respective alternative RACT determination approved under 25 Pa. Code §129.99(e) remains valid.

25 Pa. Code §129.115(a)(6) – Air Contamination Source Information (Commenced Operation After August 3, 2018)

Because the Facility was a major VOC emitting facility prior to August 3, 2018, 25 Pa. Code §129.115(a)(6) does not apply.

25 Pa. Code §129.115(a)(7) – Air Contamination Source Information (Sources That Emit Less Than 1 Ton Per Year)

Table A-2 of Attachment A provides an inventory that includes a description, including make, model, and location (as available) of each source that has a PTE less than 1 tpy VOC. Supporting PTE calculations are provided as Table A-3 of Attachment A.

Analysis of Alternative RACT Compliance [25 Pa. Code §129.114(i)]

Table 1 summarizes the sources that require alternative RACT determinations and proposed RACT for control of VOC emissions in accordance with 25 Pa. Code §129.114(c) because they are not subject to a presumptive RACT standard under 25 Pa. Code §129.112.

Table 1
Summary of Sources that Require Alternative RACT Determinations

Source ID	Source Name
101	Gelcoat Operation
102A	Non-Atomized Resin Application Mechanical
102B	Non-Atomized Resin Application Mechanical and Manual
105	Primer Spray Operation (3 Booths & 1 Flash Area)

Source IDs 101, 102A, 102B, and 105 were in operation prior to October 24, 2016, have not been modified or changed since October 24, 2016, and are not subject to a presumptive RACT standard under 25 Pa. Code §§129.112(c)(11) or (i)-(k). MFG is therefore submitting a certified analysis under 25 Pa. Code §129.114(i) to demonstrate that compliance with the alternative RACT requirements or limitations approved by PADEP under 25 Pa. Code §129.99(e), in place of alternative analyses under 25 Pa. Code §129.114(d), assures compliance with the provisions in 25 Pa. Code §129.114(c).

Under 25 Pa. Code §129.114(i), MFG must demonstrate and provide the following:

- Evaluate and determine that there is no new pollutant specific air cleaning device, air pollution control technology available at the time of submittal of this analysis.
- A statement that explains how MFG determined that there is no new pollutant specific air cleaning device, air pollution control technology or technique available.
- A list of the technically feasible air cleaning devices, air pollution control technologies or techniques previously identified, evaluated, and approved under 25 Pa. Code §129.92 (b)(1)-(3) included in the written RACT proposal submitted under §129.99(d) and approved by the Department or appropriate approved local air pollution control agency under §129.99(e).
- A summary of the economic feasibility analysis performed for each technically feasible air pollution control technology or technique and the cost effectiveness of each technically feasible air cleaning device, air pollution control technology or technique submitted under 25 Pa. Code §129.99(d).
- A statement that an evaluation of each economic feasibility analysis demonstrates that the cost effectiveness remains equal to or greater than \$12,000 per ton of VOC emissions reduced.

Source IDs 101, 102A, 102B, and 105 consist of related operations conducted at various points throughout the Facility. Source ID 101 comprises various gelcoat activities that occur as part of the Custom Molding Line (i.e., Source ID 102A) and the GP Molding Line (i.e., Source ID 102B). Therefore, the alternative RACT analysis approved by PADEP under 25 Pa. Code §129.99(e) assessed the availability and technical feasibility of available control technologies for Facility-wide capture and control of VOC emissions, and subsequently assessed economic feasibility for the three following control scenarios:

- Control of Facility-wide emissions
- Control of highest-concentration process area (Custom Molding Line)
- Control of highest-concentration single source (GP Molding Line Gelcoat Booth)

The following subsections provide the analysis of alternative RACT compliance under 25 Pa. Code §129.114(i).

25 Pa. Code §129.114(i)(1)(i)(A) – Identification of New Air Cleaning Devices, Air Pollution Control Technologies, or Techniques

MFG conducted an analysis of the RACT/Best Available Control Technology (BACT)/Lowest Achievable Emissions Rate (LAER) Clearinghouse (RBLC) to determine if any new air cleaning devices, air pollution control technologies, or techniques could be applied to the units onsite. No air cleaning devices, air pollution control technologies, or techniques in addition to those available for the RACT II analysis (see Table 2) were identified and the current emissions controls for the RACT III affected units are consistent with recent and historical BACT determinations for similar sources.

25 Pa. Code §129.114(i)(1)(i)(B) – List Previously-Identified Technically Feasible Controls

Table 2 provides a list of technically feasible air pollution control technologies that were previously identified by MFG under 25 Pa. Code §§129.92(b)(1)-(3) for RACT II. MFG determined that carbon adsorption and a fluidized bed preconcentrator/adsorber with a regenerative thermal oxidizer (RTO) were technically infeasible control technologies for the highest-concentration process area (Custom Molding Line) and highest-concentration single source (GP Molding Line Gelcoat Booth) at the Facility due to poor suitability at lower process exhaust flowrates.

**Table 2
Technically Feasible Air Pollution Control Technologies Under
25 Pa. Code §§129.92(b)(1)-(3)**

Control Scenario	Pollutant	Control Technology Option	Cost Per Ton of Pollutant Removed
Facility-Wide Emissions	VOC	RTO	\$19,413
		Carbon Adsorption	\$19,722
		Fluidized Bed Preconcentrator/Adsorber with an RTO	\$15,242
		Good Operating Practices	--
Highest-Concentration Process Area (Custom Molding Line)	VOC	RTO	\$19,508
		Good Operating Practices	--
Highest-Concentration Single Source (GP Molding Line Gelcoat Booth)	VOC	RTO	\$13,064
		Good Operating Practices	--

25 Pa. Code §129.114(i)(1)(i)(C) – Summary of Previous Economic Feasibility Analyses

MFG performed analyses under 25 Pa. Code §129.99(d) to determine which, if any, of the technically feasible control technologies identified in Table 2 were economically feasible using the methods presented in the “EPA Air Pollution Control Cost Manual” (Sixth Edition, EPA/452/B-02-0001, January 2002), as amended. The corresponding cost effectiveness for each technically feasible air cleaning device, air pollution control technology or technique as submitted under 25 Pa. Code §129.99(d) is provided in Table 2.

Source IDs 101, 102A, 102B, and 105 had already employed good operating practices prior to the alternative RACT analysis approved under 25 Pa. Code §129.99(e). Therefore, no additional economic, environmental, or energy impacts were anticipated for this control option. The capital costs supporting the cost-effectiveness values provided in Table 2 were calculated based on vendor quotes and engineering judgment.

25 Pa. Code §129.114(i)(1)(i)(D) – Statement of Economic Infeasibility

Based on the summary of economic feasibility provided herein in accordance with 25 Pa. Code §129.114(i)(1)(i)(C), MFG has demonstrated that the cost effectiveness of the technically feasible control strategies provided under 25 Pa. Code §129.99(d) remain equal to or greater than \$12,000 per ton of VOC emissions. When considering the increases to the cost of fuel and inflation as indicated by the Consumer Price Index (CPI), the overall control costs expressed in 2022 dollars will have increased, and the control technologies for which cost effectiveness was evaluated in MFG’s 25 Pa. Code §129.99(d) submittal remain economically infeasible. Therefore, no further economic feasibility evaluations were conducted for the control technologies listed in Table 2.

25 Pa. Code §129.114(i)(1)(i)(E) – Additional Information


Upon request from PADEP, MFG will provide additional information to support MFG’s 25 Pa. Code §129.114(i) analysis.

Alternative RACT Compliance Summary

Based on the 25 Pa. Code §129.114(i) analysis provided herein, MFG has determined that the alternative RACT II requirements previously approved by PADEP under 25 Pa. Code §129.99(e) continue to be RACT for Source IDs 101, 102A, 102B, and 105. MFG proposes to comply with RACT III by continuing to comply with the RACT-specific conditions of TVOP No. 25-00035 as summarized in Table A-4 of Attachment A.

Certification of Alternative RACT Compliance Analysis

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this 25 Pa. Code §129.114(i) Alternative RACT Compliance Analysis are true, accurate, and complete.

Signature:  Date: 12-22-2022
Name: Dennis Vorse Title: Vice President and General Manager

RACT III Compliance and Recordkeeping

In accordance with 25 Pa. Code §129.115(f), MFG will keep sufficient records for demonstrating compliance with RACT III, including continued compliance with the RACT-specific conditions of TVOP No. 25-00035. In accordance with 25 Pa. Code §129.115(k), all records will be maintained for at least five years and will be made available to PADEP upon receipt of a written request. Compliance will be achieved by January 1, 2023 in accordance with 25 Pa. Code §129.111(a)(1).

Should you have any questions related to this submittal, or require additional information, please contact me at (814) 438-3841.

Sincerely,
Molded Fiber Glass Companies



Dennis Vorse
Vice President and General Manager

cc: Kim Lute (ALL4 LLC)

Attachment A – RACT III Applicability and Compliance Summary

ATTACHMENT A
RACT III APPLICABILITY AND COMPLIANCE SUMMARY

**Table A-1
RACT III VOC Applicability Summary
Molded Fiber Glass Companies - Union City, PA**

Source ID	Source Designation	RACT III Applicability		
		Classification	RACT III Citation	Limitation/Requirement
030	Facility Heaters (5 Makeup Air)	Exempt - PTE <1 tpy VOC	25 Pa. Code §129.111(c)	N/A
B02	Boiler	Exempt - PTE <1 tpy VOC	25 Pa. Code §129.111(c)	N/A
B03	Boiler (Bonding)	Exempt - PTE <1 tpy VOC	25 Pa. Code §129.111(c)	N/A
101	Gelcoat Operation	VOC air contamination source with PTE >2.7 tpy VOC	25 Pa. Code §§129.114(c) and 129.114(i)	Case-by-case determination and demonstration that compliance with the alternative RACT requirement or limitation approved by PADEP under 25 Pa. Code §129.99(e) assures compliance with the provisions in 25 Pa. Code §§129.114(a)-(c) and (e)-(h), except for sources subject to §§129.112(c)(11) or (i)-(k).
102A	Non-Atomized Resin Application Mechanical	VOC air contamination source with PTE >2.7 tpy VOC	25 Pa. Code §§129.114(c) and 129.114(i)	Case-by-case determination and demonstration that compliance with the alternative RACT requirement or limitation approved by PADEP under 25 Pa. Code §129.99(e) assures compliance with the provisions in 25 Pa. Code §§129.114(a)-(c) and (e)-(h), except for sources subject to §§129.112(c)(11) or (i)-(k).
102B	Non-Atomized Resin Application Mechanical & Manual	VOC air contamination source with PTE >2.7 tpy VOC	25 Pa. Code §§129.114(c) and 129.114(i)	Case-by-case determination and demonstration that compliance with the alternative RACT requirement or limitation approved by PADEP under 25 Pa. Code §129.99(e) assures compliance with the provisions in 25 Pa. Code §§129.114(a)-(c) and (e)-(h), except for sources subject to §§129.112(c)(11) or (i)-(k).
103	Curing Oven	Exempt - PTE <1 tpy VOC	25 Pa. Code §129.111(c)	N/A
105	Primer Spray Operation (3 Booths & 1 Flash Area)	VOC air contamination source with PTE >2.7 tpy VOC	25 Pa. Code §§129.114(c) and 129.114(i)	Case-by-case determination and demonstration that compliance with the alternative RACT requirement or limitation approved by PADEP under 25 Pa. Code §129.99(e) assures compliance with the provisions in 25 Pa. Code §§129.114(a)-(c) and (e)-(h), except for sources subject to §§129.112(c)(11) or (i)-(k).
106	Drying Oven (1)	Exempt - PTE <1 tpy VOC	25 Pa. Code §129.111(c)	N/A
108	Assembly/Bonding Process	VOC air contamination source with PTE <2.7 tpy VOC	25 Pa. Code §129.112(c)(2)	Shall install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
109	Reaction Injection Molding Presses (2)	VOC air contamination source with PTE <2.7 tpy VOC	25 Pa. Code §129.112(c)(2)	Shall install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
202A	Closed Molding Operations	Exempt - PTE <1 tpy VOC	25 Pa. Code §129.111(c)	N/A
RST	Resin Storage Tanks (5)	Exempt - PTE <1 tpy VOC	25 Pa. Code §129.111(c)	N/A

Table A-2
VOC Source Inventory
Molded Fiber Glass Companies - Union City, PA

Source ID	Source Designation	Fuel/ Throughput Material	Make	Model
030	Facility Heaters (5 Makeup Air)	Natural Gas	Various	Various
B02	Boiler	Natural Gas	Bryan Boiler	CLM-S-15-FDC
B03	Boiler (Bonding)	Natural Gas	Cleaver Brooks	Clear Fire H 30 HP
101	Gelcoat Operation	Catalyst, Gelcoat	Not Applicable (N/A)	N/A
102A	Non-Atomized Resin Application Mechanical	Catalyst, Resins	N/A	N/A
102B	Non-Atomized Resin Application Mechanical & Manual	Catalyst, Resins	N/A	N/A
103	Curing Oven	Natural Gas	Unknown	Unknown
105	Primer Spray Operation (3 Booths & 1 Flash Area)	MEK, Paint	N/A	N/A
106	Drying Oven (1)	Natural Gas, Paint	Unknown	Unknown
108	Assembly/Bonding Process	Adhesives	N/A	N/A
109	Reaction Injection Molding Presses (2)	Dicyclopentadiene	Beckwood, Gusmer, Cannon	4P50F8120, RX Rincell 200, Custom Built
202A	Closed Molding Operations	Styrene Monomer, Resins/Fillers	N/A	N/A
RST	Resin Storage Tanks (5)	Resin	N/A	N/A

Table A-3
VOC Potential to Emit of Exempt Sources
Molded Fiber Glass Companies - Union City, PA

Source ID	Source Name	Throughput			Emissions Factor			Potential to Emit ^(a)
		Material	Value	Units	Value	Units	Reference	(tpy)
030	Facility Heaters (5 Makeup Air)	Natural Gas	3.13E-02	MMscf/hr	5.5	lb/MMscf	AP-42, Chapter 1.4, Table 1.4-2	0.75
B02	Boiler	Natural Gas	3.00E-03	MMscf/hr	5.5	lb/MMscf	AP-42, Chapter 1.4, Table 1.4-2	0.07
B03	Boiler (Bonding)	Natural Gas	1.20E-03	MMscf/hr	5.5	lb/MMscf	AP-42, Chapter 1.4, Table 1.4-3	0.03
103	Curing Oven	Natural Gas	9.00E-04	MMscf/hr	5.5	lb/MMscf	AP-42, Chapter 1.4, Table 1.4-4	0.02
106	Drying Oven (1)	Natural Gas	1.65E-03	MMscf/hr	5.5	lb/MMscf	AP-42, Chapter 1.4, Table 1.4-5	0.04
202A	Closed Molding Operations	Styrene Monomer	100	lb/hr	0.02	%	Engineering Judgment	0.09
RST	Resin Storage Tanks (5)	Resin	50,000	gal/yr	14.96	lb/yr	AP-42, Chapter 7, Section 7.1.3.1.2 ^(b)	0.01

^(a) Potential to emit calculations for all units except the Resin Storage Tanks are based on an operating time of 8,760 hours per year.

^(b) Potential to emit calculations for the Resin Storage Tanks are based on the calculation methodology in U.S. EPA's AP-42, Chapter 7, Section 7.1.3.1.2 for working loss from a fixed roof tank.

**Table A-4
Alternative RACT Conditions of TVOP No. 25-00035
Molded Fiber Glass Companies - Union City, PA**

Source ID	Source Name	TVOP Citation	Alternative RACT Requirement
101	Gelcoat Operation	Section D, Source ID 101, Condition #002	Resins and gelcoats used in this process shall have no more than 45% VOC content, by weight, as applied, averaged monthly over all resins and gelcoats used.
		Section D, Source ID 101, Condition #004	Records shall be maintained of VOC content for the resins and gelcoats to ensure compliance with the VOC limit. These records shall be maintained for five years and be made available to PADEP upon request.
		Section D, Source ID 101, Condition #006	This source shall be operated according to good operating practices to minimize emissions of VOC. This shall, at a minimum, consist of the following: <ul style="list-style-type: none"> • The permittee shall comply with the applicable work practice standards of 40 CFR 63 Subpart WWWW, Table 4. • The permittee shall, to the extent practicable, use lower-VOC gelcoat materials. • The permittee shall minimize emissions from mixing and cleanup operations to the extent practicable, which shall include covering containers during mixing operations, and the use of lower-VOC cleanup solvents.
102A	Non-Atomized Resin Application Mechanical	Section D, Source ID 102A, Condition #002	Resins and gelcoats used in this process shall have no more than 45% VOC content, by weight, as applied, averaged monthly over all resins and gelcoats used.
		Section D, Source ID 102A, Condition #004	Records shall be maintained of VOC content for the resins and gelcoats to ensure compliance with the VOC limit. These records shall be maintained for five years and be made available to PADEP upon request.
		Section D, Source ID 102A, Condition #006	This source shall be operated according to good operating practices to minimize emissions of VOC. This shall, at a minimum, consist of the following: <ul style="list-style-type: none"> • The permittee shall comply with the applicable work practice standards of 40 CFR 63 Subpart WWWW, Table 4. • The permittee shall, to the extent practicable, use lower-VOC resin materials. • The permittee shall, to the extent practicable, use non-atomizing mechanical resin application methods. • The permittee shall, to the extent practicable, use closed molding methods. • The permittee shall minimize emissions from mixing and cleanup operations to the extent practicable; which shall include covering containers during mixing operations, and the use of lower-VOC cleanup solvents.
102B	Non-Atomized Resin Application Mechanical and Manual	Section D, Source ID 102B, Condition #002	Resins and gelcoats used in this process shall have no more than 45% VOC content, by weight, as applied, averaged monthly over all resins and gelcoats used.
		Section D, Source ID 102B, Condition #004	Records shall be maintained of VOC content for the resins and gelcoats to ensure compliance with the VOC limit. These records shall be maintained for five years and be made available to PADEP upon request.
		Section D, Source ID 102B, Condition #006	This source shall be operated according to good operating practices to minimize emissions of VOC. This shall, at a minimum, consist of the following: <ul style="list-style-type: none"> • The permittee shall comply with the applicable work practice standards of 40 CFR 63 Subpart WWWW, Table 4. • The permittee shall, to the extent practicable, use lower-VOC resin materials. • The permittee shall, to the extent practicable, use non-atomizing mechanical resin application methods. • The permittee shall, to the extent practicable, use closed molding methods. • The permittee shall minimize emissions from mixing and cleanup operations to the extent practicable; which shall include covering containers during mixing operations, and the use of lower-VOC cleanup solvents.
105	Primer Spray Operation (3 Booths & 1 Flash Area)	Section D, Source ID 105, Condition #002	Resins and gelcoats used in this process shall have no more than 45% VOC content, by weight, as applied, averaged monthly over all resins and gelcoats used.
		Section D, Source ID 105, Condition #003	a) The surface coatings used in this process shall contain no more than 4.0 pounds of VOCs per gallon, as applied, averaged monthly over all coatings used. b) VOC emissions from the surface coating operations shall not exceed 40.0 tons per year, based on any consecutive 12-month rolling period.
		Section D, Source ID 105, Condition #005	Records shall be maintained of VOC content for the resins and gelcoats to ensure compliance with the VOC limit. These records shall be maintained for five years and be made available to PADEP upon request.
		Section D, Source ID 105, Condition #006	Records shall be maintained of VOC content for the coating to ensure compliance with the VOC per gallon limit. Records shall also be maintained of total VOC emissions calculated on a 12-month rolling basis to ensure compliance with the 40.0 ton per year VOC limit. These records shall be maintained for five years and be made available to PADEP upon request.
		Section D, Source ID 105, Condition #009	This source shall be operated according to good operating practices to minimize emissions of VOC. This shall, at a minimum, consist of the following: <ul style="list-style-type: none"> • The permittee shall, to the extent practicable, use lower-VOC coating materials. • The permittee shall use only HVLP paint application methods. • The permittee shall minimize emissions from mixing and cleanup operations to the extent practicable; which shall include covering containers during mixing operations, and the use of lower-VOC cleanup solvents.