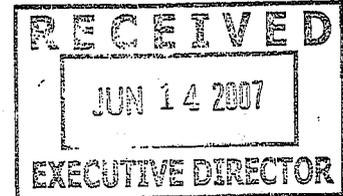


AIR & WASTE ENGINEERING, INC.**2000 Dairy Ashford, Ste. 230****Houston, Texas 77077**

OFC (281)493-5399 FAX (281)493-5699

June 14, 2007

Mr. Glenn Shankle, Executive Director
Texas Commission on Environmental Quality
12100 Park 35 Circle
Austin, Texas 78753



FEDEX Airbill No. 8566 0891 0865

Re: §20.15. Petition for Adoption of Rules
30 TAC § 115.420(b) (9) (Miscellaneous Metal Parts and
Products {MMPP}) – Definitions
Texas Commission on Environmental Quality (TCEQ)
Air Account Number: ED-0298-B
Southwest Spray Painters
Ennis, Ellis County
Regulated Entity Number: RN100801000
Customer Reference Number: CN600422539

Dear Mr. Shankle:

On behalf of Southwest Spray, Inc. located at 1702 Jack McKay Boulevard, Ennis, Texas 75119, pursuant to 30 TAC §20.15 we are submitting a Petition for Adoption of Rules.

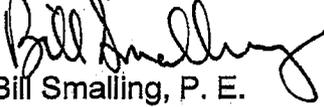
In this petition, it is proposed to add a definition for metal fasteners in 30 TAC § 115.420(b) (9). The U.S.E.P.A. document *Control of Volatile Organic Emissions from Existing Stationary Sources - Volume VI: Surface Coating of Miscellaneous Metal Parts and Products* (EPA-450/2-78-015) (p. iv) defines reasonably available control technology as the lowest emission limit that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility. As described in Section 5 below, implementing any of the available control measures for the coating of metal fasteners would not be "reasonably available considering technological and economic feasibility".

Also, this petition is to make the limit consistent with the limit for metal fasteners in 30 TAC § 115.421(a) (11) (B) {Aerospace Coatings}. A separate petition is being submitted concurrently to add a category for metal fasteners in 30 TAC § 115.421(a) (9) (A) (Miscellaneous Metal Parts and Products {MMPP}).

In addition, we respectfully request a moratorium on the enforcement of 30 TAC § 115.421(a) (9) (A) against any facilities affected by this petition until the matter is

resolved. If you have any questions or would like additional information, please call us at (281) 493-5399.

Sincerely,



Bill Smalling, P. E.
Air & Waste Engineering, Inc.

Enclosures

Bsm/dv

Cc: Mr. Jim Rainey, Southwest Spray, Inc., Ennis Plant, 1702 Jack McKay
Boulevard, Ennis, Texas 75119
Mr. Bob Rader, Esq., 2777 Stemmons Freeway, Suite 1125, Dallas, TX 75207

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5	Petition for Adoption of Rule Pursuant to 30 TAC §20.15; 30 TAC § 115.420(b) (9) (Miscellaneous Metal Parts and Products {MMPP}) – Definitions

1. Introduction

Southwest Spray, Inc. located at 1702 Jack McKay Boulevard, Ennis, Texas 75119 pursuant to 30 TAC §20.15 is submitting a Petition for Adoption of Rules. In this petition, it is proposed to add a definition for metal fasteners in 30 TAC § 115.420(b) (9). This petition is to make the limit consistent with the limit for metal fasteners in 30 TAC § 115.421(a) (11) (B) {Aerospace Coatings}. A separate petition is being submitted concurrently to add a category for metal fasteners in 30 TAC § 115.421(a) (9) (A) (Miscellaneous Metal Parts and Products {MMPP}).

The rationale behind this proposal is that on September 28, 2005 (effective October 20, 2005) the TCEQ adopted a regulation which incorporated surface coating operations in Ellis County, Texas into the control requirements of 30 TAC § 115.420 through § 115.429. The TCEQ's MMPP surface coating regulation when adopted initially in 1979 and as amended over the years did not take into account the effect on various industry SIC codes affected by the regulation. The regulation affects SIC groups 33 through 39.

Southwest Spray, Inc. coats metal fasteners (SIC Codes 3451 and 3452). The company has found very little availability of low gloss high performance exterior grade 2-part polyurethane paints which meets the 3.0 pounds of VOC per gallon limit (PVPG) in 30 TAC § 115.421(a)(9)(A). Due to the unusual shape of the parts (fasteners) being painted, the parts must be painted from four directions to achieve full coverage. This results in four full wet coats on some areas of the part. The use of a 3.0 or 3.5 PVPG coating results in a dry film paint thickness of 2.0 mils or above. The precision tolerances – on drivers*, on threads and on pressure surfaces - cause coatings on the part over 2.0 mils to render the part unusable. (*In layman's terms, a "driver" on a fastener is the slot into which the screwdriver fits.) That is, any coating over 2.0 mils may cause the part to be useless in the application for which it was designed.

Also, due to the low "hide" characteristics* of the 3.0 or 3.5 PVPG coatings, more paint as to be applied to achieve cosmetic quality. (*In simplified layman's terms, the "hide" characteristic of paint indicates the percentage of surface area covered by the desired color of paint.) This likely would produce coatings thicknesses well above 2.0 mils. This would produce an even larger negative effect on part quality.

The coatings, which we are presently using and which meet the requested 5.67 PVPG limit, enable us to produce parts with an acceptable coating thickness.

The USEPA has taken steps towards recognizing this problem. The Air Toxics MMPP regulation in 40 CFR 63, Subpart MMMM has an exemption for "Wet Fastener Installation Coatings" in the regulation. In this exemption there is no VOC coating limit for "Wet Fastener Installation Coating" wherein a primer or sealant is applied by dipping, brushing or daubing to fasteners which are installed before the coating is cured. Also, some of the large air quality management districts in California have this exemption in their MMPP rules.

Also, the EPA's RACT Control Technique Guideline (CTG) for Aerospace coatings and Air Toxics Aerospace coatings regulation in 40 CFR 63 both have specific limits for "Wet Fastener Installation Coatings" in the regulation. These limits are 5.67 PVPG of coating. These limits are believed to have been originally derived by EPA from a California Air Resources Board regulation on aerospace coatings.

2. Process Description

The following is a description of the existing process as currently permitted in Permit Number 35589. This facility coats various types of fasteners, including staples and nail tops. High solids/low solvent coatings do not work with this type of process because these types of coatings produce a higher mil thickness coating and a lower scratch resistance. Both characteristics are undesirable to nail/fastener coatings.

Staples are spray coated in the Staple Coating Booth (Emission Point Number {EPN P-1}); the staples are allowed to dry in the building. After drying, the staples are packaged and shipped to the customers.

Uncoated nails/fasteners are unpacked and placed in metal boards for holding during the painting process. The sheets are positioned in the booth so that only the heads are coated. A primer coat is applied in the Primer Booth (EPN P-2). Upon completion of the primer coat, the nails are allowed to dry in the building.

Then a topcoat is applied in the Topcoat Booth (EPN P-3). The nails/fasteners exit the Topcoat Booth. A portion of the Topcoat Booth drying occurs in the building. The flash-off percentages for the Topcoat Booth are estimated to be: booth-40%; holding area outside booth-30%; oven-30%.

The nails/fasteners go to a gas fired 200,000 BTU/Hr. drying oven (EPN O-1). In this oven the nails are dried to a hard finish. The nails/fasteners are removed from the metal boards and repacked for shipping to customers.

The metal boards were formerly cleaned in a 27 cubic foot methylene chloride wash tank (D-1). This tank has been permanently shutdown. Paint is stored in a Paint Storage Room (EPN S-1).

3. Discussion of Non-Attainment Area (NAA) MMPP Rule for SICs 3451 and 3452 Nationwide {Major Sources Only}

The EPA's TRI reporting site was searched for all SIC 3451 and 3452 that reported toluene and xylene. The reporting of these chemicals should be an indicator of painting operations at the plants. The fact that the companies were TRI reporters for these chemicals should indicate that the plants were major sources of VOCs and/or HAPs. The search returned eleven facilities. Of these eleven, nine had ceased reporting both toluene and xylene by the year 2000. These are: Parker Hannefin Corp., Boaz, Alabama; Triumph, LLC, Tempe, Arizona; HR Products, South Bend, Indiana; Hi-Shear Corp., Torrance, California; Metform Corporation, Savanna, Illinois; SPD Products, Rockford, Illinois; American Engineered Components, Cambridge, Massachusetts; Aplix, Charlotte, North Carolina; and SPS Technologies, Jenkintown, Pennsylvania.

It is believed that these nine companies shutdown or significantly reduced their surface coating operations in order to avoid the expense of complying with either or both of two major regulatory initiatives under the Clean Air Act. These would be (1) the ozone non-attainment area regulations for the control of VOC from MMPP and (2) the EPA's Air Toxics MMPP regulation in 40 CFR 63, Subpart Mmmm.

Of the remaining two, Caterpillar, Inc. of Mossville, Illinois is a major source of VOC, but is located in an ozone attainment area. It is likely subject to the EPA's Air Toxics MMPP regulation in 40 CFR 63, Subpart Mmmm. Caterpillar's primary SIC is 3519 (Internal Combustion Engines). SIC 3452 is only a secondary SIC for the company. According to the TRI summary, Caterpillar is also reducing its surface coating operations. The company last reported toluene in 2003. By 2005, xylene emissions had been reduced to 9 TPY and were projected to decrease to 4 TPY by 2007. The company is likely subject to EPA's Air Toxics MMPP regulation in 40 CFR 63, Subpart Mmmm. However, since SIC 3452 is a secondary SIC for Caterpillar, it is likely that the company can install most of the fasteners uncoated into the engines. They would then be able to use the exemption for "Wet Fastener Installation Coatings" in the regulation. In this exemption there is no VOC coating limit for "Wet Fastener Installation Coating" wherein a primer or sealant is applied by dipping, brushing or daubing to fasteners which are installed before the coating is cured.

On this date (June 14, 2007), Air Industries Company of Garden Grove, California is likely the only SIC 3452 company in the nation in total compliance with (1) the ozone non-attainment area regulations for the control of VOC from MMPP and possibly (2) the EPA's Air Toxics MMPP regulation in 40 CFR 63, Subpart Mmmm. This is because the company is using an incinerator to reduce emissions from its surface coating operations and possibly from other VOC generating sites within the plant.

4. Discussion of Non-Attainment Area (NAA) MMPP Rule for SICs 3451 and 3452 in Texas (Major and Minor Sources)

Texas Manufacturers News, Inc. lists thirty two (32) companies in SICs 3451 and 3452, of which six are classified as "large businesses". A listing of these companies is attached at the end of this section.

Additionally, a search of the Internet indicated two large Houston area fastener coating facilities that apparently have never received a TCEQ air permit and apparently have never been inspected by the TCEQ. These facilities are: Atlas Bolt and Screw Company (a subsidiary of the Marmon Group), 6722 Northwinds Drive; and Triangle Fasteners, 5210 Brittmore Road.

A search of air related activities for SICs 3451 and 3452 in the TCEQ central data base indicated nineteen total regulated entities as follows.

RN Number	Regulated Entity Name	Location	County
RN100797505	Automatic Products	2735 Forest Ln Garland TX 75042 6510	Dallas
RN100911833	Matt Graham Corp	9031 Ley Rd Houston Tx 77078 4407	Harris
RN100548890	Post Tension Product Manufacturing	704 W Simonds Rd Ste B Seagoville TX 75159 3225	Dallas
RN100694504	Young Dental Manufacturing	4401 Paredes Line Rd Brownsville TX 78526 1117	Cameron
RN100761907	Edsco Fasteners	2200 Worthington Dr Denton TX 76207 3453	Denton
RN100870294	LSS- Lone Star Fasteners, Hardy Road Location	24131 W Hardy Rd Spring TX 77373 5769	Harris
RN100559350	Highland Thread Houston	11700 Gloger St Houston TX 77039 6308	Harris
RN102735636	KT Galvanizing Company Katy	5105 3rd St Katy TX 77493 2111	Harris
RN100857010	LFC Industries	1221 Corporate Dr W Arlington TX 76006 6103	Tarrant
RN100668227	Lone Star Fasteners	10202 Airline Dr Houston TX 77037 1408	Harris
RN104356431	Madden Bolt	13420 Hempstead Rd Houston TX 77040 5813	Harris
RN102171386	Ranco	1900 C Billy Mitchell Blvd "C" Brownsville TX	Cameron
RN100666445	Shopco Manufacturing	1125 S Cedar Hill Rd Cedar Hill TX 75104 3108	Dallas

RN104359807	Sigma Fasteners	11133 IH 45 S Ste 120 Bldgs A B & C Conroe TX 77302	Montgomery
RN104894894	Sigma Fasteners	16723 Aldine Westfield Houston TX	Harris
RN101996569	T 3 Energy Services	7135 Ardmore St Houston TX 77054 3501	Harris
RN102580990	Texas Bolt Co	3233 W 11th St, Houston TX	Harris
RN100215284	Huck International, Waco Plant	8001 Imperial Dr Waco TX 76712 6522	McLennan
RN101056836	Metal Coatings Corporation (SIC 3479 – Located by a “Fasteners” Google Search.)	3700 Dunvale Houston TX	Harris

A further refinement of this search revealed that only the following eight appeared to have air emissions relating to surface coating.

RN Number	Regulated Entity Name	Location	County
RN100215284	Huck International, Waco Plant	8001 Imperial Dr Waco TX 76712	McLennan
RN100870294	LSS- Lone Star Fasteners, Hardy Road Location	24131 W Hardy Rd Spring TX 77373	Harris
RN100559350	Highland Thread Houston	11700 Gloger St Houston TX 77039	Harris
RN100668227	Lone Star Fasteners	10202 Airline Dr Houston TX 77037 1408	Harris
RN104359807	Sigma Fasteners	11133 IH 45 S Ste 120 Bldgs A B & C Conroe TX 77302	Montgomery
RN104894894	Sigma Fasteners	16723 Aldine Westfield Houston TX	Harris
RN101996569	T 3 Energy Services	7135 Ardmore St Houston TX 77054	Harris
RN101056836	Metal Coatings Corporation (SIC 3479 – Located by a “Fasteners” Google Search.)	3700 Dunvale Houston TX	Harris

The following is a discussion of each source:

- a. Huck International, Waco Plant

This facility appears at one time to have been a "major source" which is located in an attainment area (Waco, Texas). As such the company would not be subject to the emission limits in 30 TAC § 115.421(a) (9) (A). However, the company would have become subject to the Air Toxics MMPP regulation in 40 CFR 63, Subpart M. The company's Title V permit (Number 1747) was voided on September 11, 1998. This was likely done by applying for and obtaining a "synthetic minor" permit from the TCEQ. Because the facility is likely now a minor source, it would be exempted from the requirements of the MMPP regulation in 40 CFR 63, Subpart M.

b. LSS- Lone Star Fasteners, Hardy Road, Spring, Harris County

The company has obtained the following air permit by rules (PBRs) under 30 TAC §106.433 (Surface Coating).

Date	Permit Number	Source	VOC Emissions (TPY)
Oct. 14, 1997	36510	Booths 3 and 5	3.50
Nov. 9, 1998	38742	Booths 2 and 6	3.50
Feb. 19, 1999	40329	Booths 1 and 4	3.50

In the earlier applications, the company represented Xylan 1424 as a "representative" paint. The MSDS for the paint claimed a VOC content of 3.17 pounds of VOC per gallon (PVPG). The MSDS did not contain a breakdown of the VOC components by percentage; therefore, the number of 3.17 PVPG could not be verified. There were no other MSDSs in the application. The TCEQ does not undergo a stringent review of 30 TAC § 115.421(a) (9) (A) {MMPP} requirements in §106.433 applications.

In a letter dated October 6, 1998, the TCEQ warned the company that it did not meet the limit of 3.0 PVPG in 30 TAC § 115.421(a) (9) (A) (iv). The company responded that it was claiming the "extreme performance limit" 3.5 PVPG in 30 TAC § 115.421(a) (9) (A) (iii). In its letter of November 9, 1998, the TCEQ approved this response.

On February 3, 2003, Ms. Laura Burnett of TACB Region 12 performed an "ANBI" investigation on LSS. The company was pronounced generally in compliance with all TCEQ rules and regulations. However, the investigation report did not address or review any specific TCEQ regulations including the MMPP rules in 30 TAC § 115.421(a) (9) (A). Also, the report did not review any of the Recordkeeping rule requirements in the TCEQ regulations. The report also erroneously states the site is covered by Permit Number 21053. This permit belongs to Enterprise Transportation in Freeport, Texas.

c. Highland Thread, Gloger Street, Houston, Harris County

The company has applied for the following air permit by rule (PBR) under 30 TAC §106.433 (Surface Coating).

Date	Permit Number	Source	VOC Emissions (TPY)
Application Pending - April 12, 2007 (Application Date)	81833	Paint Booths	6.57

In this application, the company represented Xylan 1424/524 as a "representative" paint. The MSDS for the paint claimed a VOC content of 3.34 pounds of VOC per gallon (PVPg). The MSDS did not contain a breakdown of the VOC components by percentage; therefore, the number of 3.34 PVPg could not be verified. There were no other MSDSs in the application. The TCEQ has not completed the review of the application as of June 2007.

There have been no "ANBI" investigations on Highland Thread and the TCEQ has not reviewed any of the Recordkeeping rule requirements in the TCEQ regulations for Highland Thread.

d. Lone Star Fasteners, Airline Drive, Houston, Harris County

The company has obtained the following air permit by rule (PBR) under 30 TAC §106.433 (Surface Coating).

Date	Permit Number	Source	VOC Emissions (TPY)
July 27, 2006	79371	Paint Booth	2.84

In the application for PBR Number 79371, the company represented Xylan 1424/540 as a "representative" paint. The MSDS for the paint claimed a VOC content of 2.84 PVPg. Again, the MSDS did not contain a breakdown of the VOC components by percentage; therefore, the number of 2.84 PVPg could not be verified. There were no other MSDSs in the application. The TCEQ did not undergo a stringent review of 30 TAC § 115.421(a) (9) (A) {MMPP} requirements in this application.

There have been no "ANBI" investigations on Lone Star Fasteners and the TCEQ has not reviewed any of the Recordkeeping rule requirements in the

TCEQ regulations for Lone Star Fasteners.

e. Sigma Fasteners, IH 45 S, Conroe, Montgomery County

The company has obtained the following air permit by rule (PBR) under 30 TAC §106.433 (Surface Coating).

Date	Permit Number	Source	VOC Emissions (TPY)
Aug. 31, 2004	72898	Paint Booths	2.0

In the application for PBR Number 72898, the company represented Xylan 1424/540 as a "representative" paint. The MSDS for the paint claimed a VOC content of 2.84 PVPG. Again, the MSDS did not contain a breakdown of the VOC components by percentage; therefore, the number of 2.84 PVPG could not be verified. There were no other MSDSs in the application. The TCEQ did not undergo a stringent review of 30 TAC § 115.421(a) (9) (A) {MMPP} requirements in this application.

There have been no "ANBI" investigations on Sigma Fasteners and the TCEQ has not reviewed any of the Recordkeeping rule requirements in the TCEQ regulations for Sigma Fasteners.

f. Sigma Fasteners, Aldine Westfield Road, Houston, Harris County

The company has obtained the following air permit by rule (PBR) under 30 TAC §106.433 (Surface Coating).

Date	Permit Number	Source	VOC Emissions (TPY)
April 3, 2006	78231	Paint Booths	2.84

In the application for PBR Number 78231, the company represented Xylan 1424/540 as a "representative" paint. The MSDS for the paint claimed a VOC content of 2.84 PVPG. Again, the MSDS did not contain a breakdown of the VOC components by percentage; therefore, the number of 2.84 PVPG could not be verified. There were no other MSDSs in the application. The TCEQ did not undergo a stringent review of 30 TAC § 115.421(a) (9) (A) {MMPP} requirements in this application.

There have been no "ANBI" investigations on Sigma Fasteners and the TCEQ has not reviewed any of the Recordkeeping rule requirements in the TCEQ regulations for Sigma Fasteners.

g. T-3 Energy Services, Ardmore Street, Houston, Harris County

The company has obtained the following air permit by rule (PBR) under 30 TAC §106.433 (Surface Coating).

Date	Permit Number	Source	VOC Emissions (TPY)
April 2, 2003	54379	Paint Booth A (Electric Motor Manufacturing – SIC 3519); Paint Booth B through D (SIC 3452).	24.41

In the application for PBR Number 54379, the company represented a number of paints in a MSDS summary. The “core” paints seemed to range from 5.26 to 5.58 PVPG. The emission calculations used 5.57 and 6.59 as the PVPG content. There was no painting MSDs in the applications.

There have been no “ANBI” investigations on T-3 Energy Services and the TCEQ has not reviewed any of the Recordkeeping rule requirements in the TCEQ regulations for T-3 Energy Services.

h. Metal Coatings Corp., Dunvale Street, Houston, Harris County

The company has obtained the following air permit by rules (PBRs) under 30 TAC §106.433 (Surface Coating).

Date	Permit Number	Source	VOC Emissions (TPY)
May 12, 2000	44031	Paint Booth	0.37
May 17, 2002	50730	Paint Booth	11.46

In the application for PBR Number 44031, the company stated “that it will comply with the 3.5 PVPG limit in 30 TAC § 115.421(a) (9) (A) (iii).” The emission calculations were deemed “confidential” and were not in the permit application for public review. There was no painting MSDs in the applications.

On May 16, 2002, Mr. Mike Pham of the City of Houston performed a permit review investigation on Metal Coatings Corp. The company was pronounced generally in compliance with all TCEQ rules and regulations. However, the investigation report did mention that the facility was cited for a violation of 30 TAC § 115.421(a) (9) (A) (iii) on October 5, 1999. The violation was subsequently “resolved.” Also, the 2002 report did not review any of the

Recordkeeping rule requirements in the TCEQ regulations for Metal Coatings Corp.

MNI EZ Select - Contact Selection Summary Report

Company Name		Mailing Address		Telephone	Employees	Primary SIC Description
Address	Contact Name	FAX	Square Footage	Annual Sales		
Title						
Alcoa Fastening Systems						
8001 Imperial Dr.	P.O. Box 8117	254-776-2000	500	Bolts, nuts, rivets and washers		
Waco TX 76714	Fort Worth TX 76110	254-751-5259	300,000	\$100,000,000 - \$499,999,999		
Pres.	Mr. Donald C. Busby					
Automatic Products Corp.						
2735 Forest Ln.	2735 Forest Ln	972-272-6422	110	Screw machine products		
Garland TX 75042	Garland TX 75042 6510	972-494-0533	118,000	\$10,000,000 - \$10,000,000		
Pres., CEO	Mr. Gary E. Tedford					
Conveyors, Inc.						
620 S. 4th St.	620 S 4th Ave	817-473-4645	135	Screw machine products		
Mansfield TX 76063	Mansfield TX 76063 1928	817-473-3024	60,000	\$10,000,000 - \$15,000,000		
Pres., Opers. Mgr.	Mr. Kenneth Collins					
Dan-Loc Bolt & Gasket						
725 N. Drennan St.	725 N Drennan St	713-356-3500	200	Bolts, nuts, rivets and washers		
Houston TX 77003	Houston TX 77003 1320	713-356-3501	210,000	\$25,000,000 - \$100,000,000		
Pres.	Mr. Tom Connolly					
Highland Thread, Inc.						
11700 Gloger St.	11700 Gloger St	281-986-5100	132	Bolts, nuts, rivets and washers		
Houston TX 77039	Houston TX 77039 6308	281-986-5151	200,000	\$15,000,000 - \$20,000,000		
Pres., R & D, Sales & Mktg. Mgr.	Mr. Eric White					
Lone Star Fasteners						
24131 W. Hardy R	24131 W Hardy Rd	281-353-1191	150	Bolts, nuts, rivets and washers		
Spring TX 77373	Spring TX 77373 5769	281-353-4989	60,000	\$20,000,000 - \$20,000,000		
Pres.	Mr. Bruce Ross					

MNI EZ Select - Contact Selection Summary Report

Company Name		Mailing Address		Telephone	Employees	Primary SIC Description
Address	Contact Name	FAX	Square Footage	Annual Sales		
Title						
Accurate Automatic Mfg. Corp.						
703 Business Way	703 Business Way	972-442-6700	50	Screw machine products		
Wylie TX 75098	Wylie TX 75098 3961	972-442-4969	21,000	\$1,000,000 - \$5,000,000		
Pres.	Mr. Don Lewis					
Alcoa Fastening Systems						
8001 Imperial Dr.	P.O. Box 8117	254-776-2000	500	Bolts, nuts, rivets and washers		
Waco TX 76714	Fort Worth TX 76110	254-751-5259	300,000	\$100,000,000 - \$499,999,999		
Pres.	Mr. Donald C. Busby					
Alloy & Stainless Fasteners, Inc.						
11625 Charles St.	11625 Charles Rd	713-466-3031	73	Bolts, nuts, rivets and washers		
Houston TX 77041	Houston TX 77041 2407	713-466-9591	30,000	\$20,000,000 - \$30,000,000		
Pres.	Mr. Garfield Edmonds					
All-Pro Threaded Products						
1915 Peyco Dr. N.	1915 Peyco Dr N	817-467-1377	50	Bolts, nuts, rivets and washers		
Arlington TX 76001	Arlington TX 76001 6705	817-784-1219	30,000	\$14,000,000 - \$14,000,000		
Pres.	Mr. Jerry Dunsmore					
Anco Fastener Mfg., Inc.						
984 E. Main St.	PO Box 605	972-436-9781	20	Bolts, nuts, rivets and washers		
Lewisville TX 75057	Lewisville TX 75067 0605	972-436-1405	3,240	\$8,000,000 - \$8,000,000		
Pres.	Mr. Walter Anderson					
Automatic Products Corp.						
2735 Forest Ln.	2735 Forest Ln	972-272-6422	110	Screw machine products		
Garland TX 75042	Garland TX 75042 6510	972-494-0533	118,000	\$10,000,000 - \$10,000,000		
Pres., CEO	Mr. Gary E. Tedford					
Central Industrial Supply Co., Inc.						
2357 W. Jefferson	2357 W. Jefferson St	972-647-1191	200	Screw machine products		
Grand Prairie TX 75051	Grand Prairie TX 75051 1137	972-988-6035	150,000	N/A		
CFO	Mr. Bryan Keyes					
Conveyors, Inc.						
620 S. 4th St.	620 S 4th Ave	817-473-4645	135	Screw machine products		
Mansfield TX 76063	Mansfield TX 76063 1928	817-473-3024	60,000	\$10,000,000 - \$15,000,000		
Pres., Opers. Mgr.	Mr. Kenneth Collins					

Company Name	Address	Title	Mailing Address	Contact Name	Telephone	FAX	Employees	Square Footage	Primary SIC Description	Annual Sales
Cox Mfg. Co., Inc.	5500 N. Loop 1604	TX 78247	5500 N Loop 1604 E San Antonio TX 78247 4690	Mr. Bill Cox	210-657-7731 210-657-2345		65 30,000		Screw machine products	\$6,500,000 - \$9,999,999
Dan-Loc Bolt & Gasket	725 N. Drennan St.	TX 77003	725 N Drennan St Houston TX 77003 1320	Mr. Tom Connolly	713-356-3500 713-356-3501		200 210,000		Bolts, nuts, rivets and washers	\$25,000,000 - \$100,000,000
Highland Thread, Inc.	11700 Gloger St.	TX 77039	11700 Gloger St Houston TX 77039 6308	Mr. Eric White	281-986-5100 281-986-5151		132 200,000		Bolts, nuts, rivets and washers	\$15,000,000 - \$20,000,000
Industrial Anchors, Inc.	7225 Frint Rd.	TX 77705	PO Box 20978 Beaumont TX 77720 0978	Ms. Cheryl L. Moore	409-842-0222 409-842-9404		50 25,325		Bolts, nuts, rivets and washers	\$1,000,000 - \$2,500,000
Ingram Industries, Inc.	463 Cty. Rd. 2516	TX 75103	463 Cty. Rd. 2516 Canton TX 75103	Mr. Richard Ingram	903-848-8411 903-848-7205		25 15,500		Bolts, nuts, rivets and washers	\$1,000,000 - \$5,000,000
Interstate Fittings, Inc.	2200 Singleton Biv	TX 75212	PO Box 224429 Dallas TX 75222 4429	Mr. C. F. Burley	214-637-6720 214-634-0330		78 95,000		Bolts, nuts, rivets and washers	N/A
J L K Industries, Inc.	14545 Sommerme	TX 77041	PO Box 40143 Houston TX 77240 0143	Mr. Phillip McMahon	713-462-7761 713-462-4715		22 35,000		Bolts, nuts, rivets and washers	\$1,000,000 - \$5,000,000
Kager Industries	3168 N. State Hwy.	TX 78624	3168 N State Highway 16 Fredericksburg TX 78624 5803	Mr. Robert Kager	830-997-9391 830-997-2528		20 25,000		Screw machine products	\$1,000,000 - \$2,500,000

Company Name	Address	Mailing Address	Telephone	Employees	Primary SIC Description	Annual Sales
Title	Contact Name	FAX	Square Footage			
K-T Bolt Mfg. Co., Inc.						
1150 Katy Fort Ben						
Katy TX 77493	PO Box 683	281-391-2196	32	Bolts, nuts, rivets and washers	\$1,000,000 - \$5,000,000	
Pres.	Mr. Charles Peck	281-391-2673	40,000			
L F C Industries						
1221 Corporate Dr.						
Arlington TX 76006	1221 Corporate Dr W	817-640-1322	45	Bolts, nuts, rivets and washers	\$5,000,000 - \$5,000,000	
Pres.	Mr. B. Kelly Koons	817-652-1566	28,000			
Landreth Fastener Corp.						
8700 Scranton St						
Houston TX 77075	PO Box 262446	713-944-7400	70	Bolts, nuts, rivets and washers	\$10,000,000 - \$10,000,000	
Pres.	Mr. Tom Landreth	713-944-8277	60,000			
Lok-Mor, Inc.						
661 Airport Rd.						
Mansfield TX 76063	PO Box 151224	817-477-0232	85	Bolts, nuts, rivets and washers	\$5,000,000 - \$10,000,000	
Pres.	Mr. Jerry Dunsmore	817-453-2923	50,000			
Lone Star Fasteners						
24131 W. Hardy R						
Spring TX 77373	24131 W Hardy Rd	281-353-1191	150	Bolts, nuts, rivets and washers	\$20,000,000 - \$20,000,000	
Pres.	Mr. Bruce Ross	281-353-4989	60,000			
Madden Bolt Corp.						
13420 Hempstead						
Houston TX 77040	13420 Hempstead Rd	713-939-9999	40	Bolts, nuts, rivets and washers	\$5,000,000 - \$5,000,000	
Pres.	Mr. David Madden	713-939-7200	40,000			
Nick's Fastener						
6121 Griggs Rd.						
Houston TX 77023	6121 Griggs Rd	713-645-3480	50	Bolts, nuts, rivets and washers	\$2,500,000 - \$5,000,000	
Pres.	Ms. Belinda Nichols	713-645-5924				
Pac-Fas						
1509 Alabama St.						
South Houston TX 77587	PO Box 897	713-946-4962	60	Bolts, nuts, rivets and washers	N/A	
Pres.	Mr. Howard Bearman	713-946-4427	82,000			

Company Name	Address	Title	Mailing Address	Contact Name	Telephone	FAX	Employees	Square Footage	Primary SIC Description	Annual Sales
Pyle Machine Co.	4116 Garland Dr.		4201 Clay Ave		817-485-6011		25		Screw machine products	\$1,000,000 - \$5,000,000
	Fort Worth TX 76117		Fort Worth TX 76117 1704		817-581-7660		6,300			
		Pres.	Mr. Eldon Pyle							
R K Automatic, Inc.	2425 Thomas Rd.		PO Box 14686		817-831-3731		24		Screw machine products	\$1,000,000 - \$5,000,000
	Fort Worth TX 76117		Fort Worth TX 76117 0686		817-834-1668		12,000			
		Pres.	Mr. Kenneth Davis							
Shopco Mfg., Inc.	1125 S. Cedar Hill		PO Box 689		972-291-7183		22		Screw machine products	\$1,000,000 - \$5,000,000
	Cedar Hill TX 75104		Cedar Hill TX 75106 0689		972-291-7186		12,400			
		Pres., R & D Mgr.	Mr. Joe Ballard							
South Texas Bolt & Fittings Corp.	4845 Homestead R		4845 Homestead Rd Ste 5		713-673-5376		45		Bolts, nuts, rivets and washers	\$5,000,000 - \$10,000,000
	Houston TX 77028		Houston TX 77028 5835		713-673-5379					
		Pres.	Mr. Paul Ledbetter							
Texas Coldheaders, Inc.	581 Benjamins Way		581 Benjamins Way		972-221-0838		25		Bolts, nuts, rivets and washers	\$500,000 - \$999,999
	Lewisville TX 75057		Lewisville TX 75057 2675		972-436-8983					
		Pres., Pur., Sales & Mktg. Mgr.	Mr. John Amis							
Texas Screw Products	1519 Fulton St.		PO Box 1983		713-230-2500		50		Bolts, nuts, rivets and washers	\$10,000,000 - \$15,000,000
	Houston TX 77009		Houston TX 77291 1983		713-227-7805		34,000			
		Pres.	Mr. Walter Negley							
Tex-Thread, Inc.	3317 W. 11th St.		3317 W 11th St		713-802-1091		37		Bolts, nuts, rivets and washers	\$6,000,000 - \$6,000,000
	Houston TX 77008		Houston TX 77008 6109		713-802-2950		20,000			
		Pres., Fin., Pur. & R & D Mgr.	Mr. Troy Palmer							
U. S. Bolt Mfg., Inc.	12895 S. Main St.		PO Box 35535		713-726-1000		30		Bolts, nuts, rivets and washers	\$1,000,000 - \$5,000,000
	Houston TX 77035		Houston TX 77235 5535		713-726-1144		30,000			
		Chrm.	Mr. Walter Nagley							

5. Petition for Adoption of Rule Pursuant to 30 TAC §20.15

§20.15. Petition for Adoption of Rules. Any person may petition the commission to request the adoption of a rule. Petitions shall be submitted in writing to: Executive Director, Texas Commission on Environmental Quality, P.O. Box 13087, Austin, Texas 78711-3087, and shall comply with the following requirements:

(1) each rule requested must be submitted by separate petition;

In this petition, it is proposed to add a definition for metal fasteners in 30 TAC § 115.420(b) (9). This petition is to make the limit consistent with the limit for metal fasteners in 30 TAC § 115.421(a) (11) (B) {Aerospace Coatings}. A separate petition is being submitted concurrently to add a category for metal fasteners in 30 TAC § 115.421(a) (9) (A) (Miscellaneous Metal Parts and Products {MMPP}).

The rationale behind this proposal is that on September 28, 2005 (effective October 20, 2005) the TCEQ adopted a regulation which incorporated surface coating operations in Ellis County, Texas into the control requirements of 30 TAC § 115.420 through § 115.429. The TCEQ's MMPP surface coating regulation when adopted initially in 1979 and as amended over the years did not take into account the effect on various industry SIC codes affected by the regulation. The regulation affects SIC groups 33 through 39.

The USEPA has taken steps towards recognizing this problem. The Air Toxics MMPP regulation in 40 CFR 63, Subpart Mmmm has an exemption for "Wet Fastener Installation Coatings" in the regulation. In this exemption there is no VOC coating limit for "Wet Fastener Installation Coating" wherein a primer or sealant is applied by dipping, brushing or daubing to fasteners which are installed before the coating is cured. Also, some of the large air quality management districts in California have this exemption in their MMPP rules.

Also, the EPA's RACT Control Technique Guideline (CTG) for Aerospace coatings and Air Toxics Aerospace coatings regulation in 40 CFR 63 both have specific limits for "Wet Fastener Installation Coatings" in the regulation. These limits are 5.67 PVPg of coating. These limits are believed to have been derived by EPA from a California Air Resources Board regulation on aerospace coatings.

(2) each petition must state the name and address of the petitioner;

The petitioner for this application will be:

Mr. Jim Rainey
Southwest Spray, Inc.
1702 Jack McKay Boulevard
Ennis, TX 75119

Office – (972)875-5665
FAX – (972)875-5666

Copies of all correspondence should also be sent to:

Bill Smalling, P.E.
Air & Waste Engineering, Inc.
2000 Dairy Ashford
Suite 230
Houston, TX 77077
Office – (281)493-5399
FAX – (281)493-5699

Bob Rader, Esq.
2777 Stemmons Freeway
Suite 1125
Dallas, TX 75207
Office – (214)630-4700
FAX – (214)630-9996

(3) each petition shall include:

(A) a brief explanation of the proposed rule;

It is proposed to add a definition for metal fasteners in 30 TAC § 115.420(b) (9). Also, it is proposed to add a category for metal fasteners in 30 TAC § 115.421(a) (9) (A) to make the limit consistent with the limit for fasteners in 30 TAC § 115.421(a) (11) (B) {Aerospace Coatings}.

(B) the text of the proposed rule prepared in a manner to indicate the words to be added or deleted from the text of the current rule, if any;

*It is proposed to add a definition for metal fasteners in 30 TAC § 115.420(b) (9). The wording proposed to be added is in **SMALL CAPS**.*

§115.420. Surface Coating Definitions.

(b) Specific surface coating definitions. The following terms, when used in this division, shall have the following meanings, unless the context clearly indicates otherwise.

(9) Miscellaneous metal parts and products coating.

(G) FASTENERS (METAL) - ANY CATEGORY OF COATED METAL PRODUCTS, INCLUDING THOSE WHICH ARE INCLUDED IN THE STANDARD INDUSTRIAL CLASSIFICATION CODE GROUPS 3451 (SCREW MACHINE PRODUCTS) AND 3452 (BOLTS, NUTS, SCREWS, RIVETS, AND WASHERS).

In a separate petition, it is proposed to add a category for metal fasteners in 30 TAC § 115.421(a) (9) (A) to make the limit consistent with the limit for fasteners in 30 TAC § 115.421(a) (11) (B) {Aerospace Coatings}. The wording proposed to be added is in

SMALL CAPS.

§ 115.421. Emission Specifications.

(a) No person in the Beaumont/Port Arthur, Dallas/Fort Worth, El Paso, and Houston/Galveston areas as defined in § 115.10 of this title (relating to Definitions) may cause, suffer, allow, or permit volatile organic compound (VOC) emissions from the surface coating processes affected by paragraphs (1) - (15) of this subsection to exceed the specified emission limits. These limitations are based on the daily weighted average of all coatings delivered to each coating line, except for those in paragraph (10) of this subsection which are based on paneling surface area, and those in paragraph (14) of this subsection which, if using an averaging approach, must use one of the daily averaging equations within that paragraph. The owner or operator of a surface coating operation subject to paragraph (11) of the subsection may choose to comply by using the monthly weighted average option as defined in § 115.420(b)(1)(XX) of this title (relating to Surface Coating Definitions).

(9) Miscellaneous metal parts and products (MMPP) coating.

(A) VOC emissions from the coating of MMPP shall not exceed the following limits for each surface coating type:

(v) **FOR METAL FASTENER COATINGS: 5.67 POUNDS PER GALLON (0.675 KG/LITER) OF COATING (MINUS WATER AND EXEMPT SOLVENT).**

(C) a statement of the statutory or other authority under which the proposed rule is to be promulgated; and

Texas Health and Safety Code (See Below)*, Texas Water Code (Generally), and 30 TAC § 20.15.

*Vernon's Texas Statutes and Codes Annotated; Health and Safety Code; Title 5. Sanitation and Environmental Quality; Subtitle C. Air Quality; Chapter 382, Clean Air Act; Subchapter B, Powers and Duties of Commission; § 382.017. Rules;

(a) The commission may adopt rules. The commission shall hold a public hearing before adopting a rule consistent with the policy and purposes of this chapter.

(b) If the rule will have statewide effect, notice of the date, time, place, and purpose of the hearing shall be published one time at least 20 days before the scheduled date of the hearing in at least three newspapers, the combined circulation of which will, in the commission's judgment, give reasonable circulation throughout the state. If the rule will have effect in only a part of the state, the notice shall be published one time at least 20 days before the scheduled date of the hearing in a newspaper of general circulation in the area to be affected.

(c) Any person may appear and be heard at a hearing to adopt a rule. The executive director shall make a record of the names and addresses of the

persons appearing at the hearing. A person heard or represented at the hearing or requesting notice of the commission's action shall be sent by mail written notice of the commission's action.

(d) Subsections (a) and (b) notwithstanding, the commission may adopt rules consistent with Chapter 2001, Government Code, if the commission determines that the need for expeditious adoption of proposed rules requires use of those procedures.

(e) The terms and provisions of a rule adopted by the commission may differentiate among particular conditions, particular sources, and particular areas of the state. In adopting a rule, the commission shall recognize that the quantity or characteristic of air contaminants or the duration of their presence in the atmosphere may cause a need for air control in one area of the state but not in other areas. In this connection, the commission shall consider:

(1) the factors found by it to be proper and just, including existing physical conditions, topography, population, and prevailing wind direction and velocity; and

(2) the fact that a rule and the degrees of conformance with the rule that may be proper for an essentially residential area of the state may not be proper for a highly developed industrial area or a relatively unpopulated area.

(f) Except as provided by Sections 382.0171-382.021 or to comply with federal law or regulations, the commission by rule may not specify:

(1) a particular method to be used to control or abate air pollution;

(2) the type, design, or method of installation of equipment to be used to control or abate air pollution; or

(3) the type, design, method of installation, or type of construction of a manufacturing process or other kind of equipment.

(D)an allegation of injury or inequity that could result from the failure to adopt the proposed rule.

Incineration:

The U. S. E. P. A. document *Control of Volatile Organic Emissions from Existing Stationary Sources - Volume VI: Surface Coating of Miscellaneous Metal Parts and Products* (EPA-450/2-78-015) (p. iv) defines reasonably available control technology as the lowest emission limit that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility.

For the three paint booths at Southwest Spray Painters, preliminary engineering estimates indicate the cost of add-on controls, such as an incinerator, would be approximately ONE MILLION EIGHT HUNDRED THOUSAND DOLLARS (\$1,800,000.00). Assuming the system collects and controls around 80% of the permitted emissions of 25 tpy (20 tpy), the cost per ton controlled is about \$90,000.00. This would not be "reasonably available considering technological and economic feasibility."

VOC Limit Compliance

Southwest Spray, Inc. coats metal fasteners (SIC Codes 3451 and 3452). The company has found very little availability of low gloss high performance exterior grade 2-part polyurethane paints which meets the 3.0 pounds of VOC per gallon limit (PVPG) in 30 TAC § 115.421(a)(9)(A). Due to the unusual shape of the parts (fasteners) being painted, the parts must be painted from four directions to achieve full coverage. This results in four full wet coats on some areas of the part. The use of a 3.0 or 3.5 PVPG coating results in a dry film paint thickness of 2.0 mils or above. The precision tolerances – on drivers*, on threads and on pressure surfaces - cause coatings on the part over 2.0 mils to render the part unusable. (*In layman's terms, a "driver" on a fastener is the slot into which the screwdriver fits.) That is, any coating over 2.0 mils may cause the part to be useless in the application for which it was designed.

Also, due to the low "hide" characteristics* of the 3.0 or 3.5 PVPG coatings, more paint has to be applied to achieve cosmetic quality. (*In simplified layman's terms, the "hide" characteristic of paint indicates the percentage of surface area covered by the desired color of paint.) This likely would produce coatings thicknesses well above 2.0 mils. This would produce an even larger negative effect on part quality.

The coatings, which we are presently using and which meet the requested 5.67 PVPG limit, enable us to produce parts with an acceptable coating thickness. The only way we know we could comply with the limit without using incineration is to relocate to an ozone attainment county. The cost to relocate would be over two million dollars.

Finally, in order to use Xylan 1424 as described in some of the TCEQ PBRs, a phosphate pre-washing line would have to be installed. The cost of installing a phosphate washing line would effectively eliminate any profit margin currently achievable at the Ennis, Texas location.

Implementing either of the above two measures would not be "reasonably available considering technological and economic feasibility", because Southwest Spray would be forced out of business.