

**TEXAS NATURAL RESOURCE CONSERVATION COMMISSION SITE-SPECIFIC STATE  
IMPLEMENTATION PLAN REVISION**

**BELL HELICOPTER TEXTRON INCORPORATED**

**1. STATE IMPLEMENTATION PLAN**

The Dallas/Fort Worth (DFW) ozone nonattainment area consists of four counties (Collin, Dallas, Denton, and Tarrant) and was designated, in accordance with the Federal Clean Air Act Amendments of 1990 (FCAA), as a nonattainment area for the ozone national ambient air quality standard (NAAQS) on November 15, 1990. The FCAA required the state to develop and adopt a state implementation plan (SIP) which would reduce ozone precursor emissions by an amount sufficient for the DFW area to achieve attainment of the ozone NAAQS by November 15, 1996. The two ozone precursor emissions are volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>), however, Urban Airshed Modeling has shown that NO<sub>x</sub> reductions would be excessive and unnecessary toward ozone attainment in the DFW area. The FCAA also required reasonably available control technology (RACT) to be applied to specific VOC emission source categories. These VOC RACT controls are specified in 30 TAC Chapter 115, concerning Control of Air Pollution From Volatile Organic Compounds.

30 TAC Chapter 115, §115.421(a)(9)(iii) limits the VOC emissions from the coating of miscellaneous metal parts and products to 6.7 pounds per gallon of solids (or 3.5 pounds per gallon of coating) delivered to the application system as an extreme performance coating, based upon RACT. This rule is also known as the Miscellaneous Metal Parts Coating RACT.

Pursuant to 30 TAC Chapter 115, §115.423(a)(4), the Executive Director of the Texas Natural Resource Conservation Commission (TNRCC) may approve requirements different from those in 30 TAC Chapter 115, §115.421(a)(9) based upon the determination that such requirements are an appropriate alternate reasonably available control technology (ARACT) which will result in the lowest emissions rate that is technologically and economically reasonable. This approval constitutes a site-specific revision of the SIP and must be approved by the U. S. Environmental Protection Agency (EPA), Region 6, before it is effective.

**2. REASONS FOR THE SITE-SPECIFIC SIP REVISION**

Bell Helicopter Textron Incorporated (Bell) has demonstrated in their application that the coatings being used at the facility (Bell Plant 1) have the lowest feasible VOC content, even though these coatings do not comply with current limitations specified in 30 TAC Chapter 115, §115.421(a)(9). Safety, performance, and specifications prevent Bell from using all compliant coatings at their facility.

Safety - The coating operation which has the largest exceedance in regard to 30 TAC Chapter 115, §115.421(a)(9)(A)(iii) is the Adhesive Prime Booth in which coating materials are used to hold the helicopter's metal rotor blades together. Those materials must have special physical properties in order to ensure the safety of helicopters.

Performance - Bell's helicopters are required to have a specific operating temperature range from -67°F to 180°F which very few commercially-available coatings meet.

Specifications - Most of the coating activities at Bell are conducted in support of the military production line and coating parameters are strictly regulated by military specifications.

Bell has submitted a cost summary to the TNRCC Engineering Services Section (ESS) for a number of further add-on control options. The least expensive option for an individual painting booth is estimated to have an annualized cost of \$22,424 per ton of VOC emissions reduced and, therefore, considered cost prohibitive. Besides the add-on control options, Bell also evaluated several facility redesign options such as, exhaust recirculation, air flow reduction, and ARACT source consolidation, which are infeasible at this time.

### **3. BACKGROUND INFORMATION**

Bell manufactures helicopters and helicopter parts for private, commercial, and military use at its Fort Worth, Texas facility, also known as Bell Plant 1. The Fort Worth facility is covered by TNRCC Account Number TA-0054-T. As part of its manufacturing operations, Bell coats helicopters, rotors, and helicopter parts with extreme performance coatings.

Bell was issued a Notice of Violation (NOV) by the TNRCC Region 4 Office on September 25, 1992, for exceeding 6.7 pounds of VOC per gallon of solids limit on an individual line basis. Bell submitted an ARACT application on December 22, 1993, as allowed under 30 TAC Chapter 115, §115.423(a)(4) to resolve the NOV. An Agreed Order was signed on November 18, 1994, which requires Bell to obtain this ARACT.

### **4. SUBSTANCE OF THE SITE-SPECIFIC SIP REVISION**

Bell provided information in their application and subsequent amendments that the site-specific revision is an appropriate ARACT which will result in the lowest emission rate that is technologically and economically reasonable.

#### VOC Vapor Recovery Systems

Bell evaluated control options for the ARACT sources. Bell has already put VOC emissions control devices on two booths which are the most reasonable sources to be controlled. Bell installed a carbon concentrator/incineration system (KPR), which achieves an overall VOC destruction efficiency of 90%, to control the VOC emissions from the Blade Paint Shop (see **Provision 17**). The emissions from the Blade Paint Shop, if released uncontrolled to the atmosphere, would represent nearly half of the total ARACT source VOC emissions. After being controlled by the KPR system, the VOC emissions from this shop represent only 7.7% of the total ARACT source VOC emissions.

In addition to the KPR system, Bell installed four carbon canisters in the Rotor Touch-Up Booth which have a manufacturer guaranteed minimum VOC removal efficiency of 85% (see **Provision 18**). The emissions from the Rotor Touch-Up Booth are small compared to the emissions from the Blade Paint Shop, but in case of KPR failure, the work load from the Blade Paint Shop will be routed through the Rotor Touch-Up Booth and the emissions will be controlled by the carbon canisters.

### Compliant Coatings

Bell has and will continue to investigate and test compliant coatings to replace currently utilized non-compliant coatings and implement them when feasible. To date, Bell has found some possible substitutes in lacquer, epoxy primer, and urethane enamel coating categories and has been successful in their efforts to replace epoxy primers, which represent 20% (by volume) of the total coatings used at Bell, with water-based primers.

The VOC limitation on each coating is governed by **Provisions 8 and 11** and **Table II**. As this ARACT must be reviewed every two years pursuant to 30 TAC Chapter 115, §115.423(a)(4) (see **Provision 3**), the TNRCC may, at that time, request information on any new, lower VOC coatings that may have been developed during the interim.

### Other Measures to Reduce Emissions

Bell will be implementing several equipment, coatings, and solvent changes to reduce VOC emissions as far as possible without more add-on controls.

- Bell indicated in their application that high transfer efficiency application equipment is used to apply the coatings at their facility. Bell currently uses high volume/low pressure (HVLP), electrostatic, and air brush application equipment (see **Provision 15**) all with a transfer efficiency of at least 60% which reduces the amount of coatings used, and subsequently reduces the VOC emissions.
- Bell will use automatic equipment in the Adhesive Prime Booth and the Blade Paint Booth except during unexpected situations (see **Provision 16**).
- Bell will handle all waste, spills, and cleaning in a manner that minimizes air emissions (see **Provisions 20, 21 and 22**).
- Where feasible, Bell will substitute low vapor pressure (<5 mm Hg) solvents for the higher vapor pressure solvents currently used for the wipedown of parts and assemblies in some of the booths (see **Provision 23**). Bell will begin production testing of low vapor pressure solvents as soon as Permit R-1996 is approved, even though the proposed EPA Aerospace National Emission Standards for Hazardous Air Pollutants (NESHAP) allows wipe solvent vapor pressures up to 45 mmHg.
- Bell is planning to purchase and install 10 enclosed gun cleaners for the washing of ARACT source spray equipment within three months of the final ratification of this ARACT. Although this action will reduce emissions, this action is not an enforceable provision of the ARACT.
- Bell is also planning to purchase and install plural component mixing systems at the Conveyor Prime and Blade Paint Shop within six months of the final ratification of this ARACT. These mixing systems will replace both the existing pressure pot system at the Conveyor Prime Booth and the prime and topcoat pressure pot systems at the Blade Paint Shop. The new mixing systems will

provide substantial savings in both paint and thinner use. Although this action will reduce emissions, this action is not an enforceable provision of the ARACT.

### Estimated VOC Reduction

Bell has already achieved a total VOC emissions reduction of 41% from 58.0 tons per year (based on 1992 production) to 34.1 tons per year at the time of this ARACT submittal. However, some of the VOC emissions in this ARACT are not regulated by 30 TAC Chapter 115, e.g., some solvents are not used for wipe down of metal parts, some parts being coated are fiberglass, and some glue never touches metal. It is very difficult to quantify these usages separately from other VOC. Therefore, not all VOC in this ARACT is required to be controlled, but will be to an unquantifiable degree, resulting in VOC reduction which 30 TAC Chapter 115 would not currently achieve.

Also, it is difficult to quantify the total VOC emissions reduction from the equipment, coatings, and solvent changes at this time. However, the reduction is expected and should be revealed in future solvent, paint, and thinner usage records.

### Flexibility Provisions in the ARACT

This ARACT contains certain provisions which allow Bell to add new emissions sources and coatings at those sources up to 5 tons per year without amending the ARACT as long as the coatings were approved in the Table II (see **Provisions 13 and 14**). Five tons per year is an insignificant amount of emissions which will not jeopardize the air quality in Dallas/Fort Worth ozone nonattainment area. The EPA has been involved in the negotiation and has indicated that the five tons per year flexibility, as the provision is currently written, is approvable. However, TNRCC Executive Director approval is required before Bell can add any coating.

This ARACT also has a provision (see **Provision 6**) which allows Bell to rescind the applicability of this ARACT if the regulation affecting coating operations at aerospace production facilities is less stringent in the future and Bell determines that they can completely comply with the applicable requirements of Chapter 115 at that time. Thirty (30) days prior notice to TNRCC is required before Bell rescinds this ARACT.

The ARACT has provisions which allow Bell to add any coating source or coating category which complies with the applicable requirements of Chapter 115 without amending the ARACT (see **Provisions 9 and 12**). Those changes will be evaluated by TNRCC staff at the earliest ARACT review.

### Recordkeeping

The ARACT contains certain recordkeeping requirements which will allow the TNRCC to verify the ARACT compliance (see **Provisions 4, 5, 10 and 19**).

### ARACT Documents

The ARACT consists of the Bell ARACT submittal documents and the Provisions document. The Bell ARACT submittal documents are not included as part of this site-specific SIP, however, copies are maintained on file by Bell, the TNRCC ESS, and the TNRCC Region 4 office. The Provisions document was developed by the TNRCC ESS and agreed by Bell to ensure the enforceability of the ARACT. This

Provisions document is included as an attachment to this site-specific SIP and constitutes part of the Bell ARACT as allowed in 30 TAC Chapter 115, Subchapter E, §115.423, concerning Alternate Control Requirements, in lieu of the control technology requirements specified in §115.421, concerning Surface Coating Processes.

ATTACHMENT 1

ALTERNATE REASONABLY AVAILABLE CONTROL TECHNOLOGY  
BELL HELICOPTER TEXTRON INCORPORATED  
PROVISIONS

## **ALTERNATE REASONABLY AVAILABLE CONTROL TECHNOLOGY**

### **BELL HELICOPTER TEXTRON INCORPORATED**

#### **PROVISIONS**

1. This Alternate Reasonably Available Control Technology (ARACT), as allowed in Title 30 of the Texas Administrative Code, Chapter 115 (30 TAC 115), Subchapter E, §115.423, concerning Alternate Control Requirements, shall apply to the facility designated as Bell Helicopter Textron Incorporated, Plant 1 (Bell) and which is covered by Texas Natural Resource Conservation Commission (TNRCC) Account No. TA-0054-T.
2. This ARACT addresses only issues associated with 30 TAC Chapter 115, §115.421(a)(9) and shall apply in lieu thereof. This ARACT is defined by the submittal by Bell to the TNRCC dated December 22, 1993 as appropriately amended or supplemented, and the ARACT Provisions. Compliance with this ARACT does not ensure compliance with all TNRCC or federal rules and regulations.
3. Bell shall submit the ARACT plan for review by TNRCC staff in accordance with the requirements of Chapter 115, §115.423(a)(4). The time period for the ARACT review shall begin at the effective date of this ARACT.
4. A copy of these ARACT Provisions, the ARACT submittal dated December 22, 1993, and subsequent corrections or allowable changes will be kept together at the plant site and made available at the request of personnel from the TNRCC or any air pollution control agency with appropriate jurisdiction.
5. Material Safety Data Sheets for all materials that have the potential of emitting volatile organic compounds (VOC) in use from the last ARACT review will be kept at the plant site.
6. If any provision of this ARACT is more stringent than any new regulation governing this site, or than a permit governing new or existing sources affected by this ARACT, then for the purposes of complying with this ARACT, the ARACT condition will govern and be the standard by which compliance will be demonstrated. If at any time after issuance of this ARACT, Bell determines that they can completely comply with the applicable requirements of Chapter 115 that may affect coating operations at aerospace production facilities, Bell may rescind the applicability of this ARACT provided they give TNRCC 30 days prior notice.
7. If any provision of this ARACT is equivalent to those that may be introduced by any new regulation, or new permit governing new or existing sources affected by this ARACT, and differs only in terms of units of measure, then the new provision may be used without modifying this ARACT.
8. Coating sources at this site are limited to those listed in the attached Table I, except as may be allowed in Provision 9 and Provision 13. Bell will physically identify and mark in a conspicuous location all sources listed in the attached Table I as follows:
  - A. The facility identification numbers (FIN) as listed in the attached Table I, and

B. The emission point numbers (EPN) listed in the attached Table I.

Nothing in this ARACT shall limit any permit requirements that may become applicable to the production equipment listed in the Table I.

9. Bell may add any coating source at this site without amendment to this ARACT, provided:
  - A. The combined use of coatings and solvents used by the source complies with any applicable requirements of Chapter 115, §115.421(a), or
  - B. The source is controlled in a manner that complies with the requirements of Chapter 115, §115.423(a)(3), or
  - C. The source qualifies for an alternate method of control pursuant to Chapter 115, §115.910.

Any coating source added under this provision will be incorporated into Table I at the earliest ARACT review required by Provision 3. Nothing in this provision shall limit any permit requirements that may become applicable for any new coating source and/or add-on control equipment.

10. Recordkeeping required by this ARACT that may be additional to current requirements of Chapter 115, effective orders, or permits will not begin until the effective date of this ARACT and subsequently shall be required to be maintained only for the months beginning after that date.
11. The VOC content, as applied, of all coatings used shall comply with the categorical limitations set forth in the attached Table II. The records required in Provision 19 will be the method of demonstrating continuous compliance with this provision.
12. Bell may do the following without amending this ARACT:
  - A. Add to Table II any new production coating category with an associated VOC content limit not to exceed 3.5 pounds per gallon of coating, as applied. Any production coating category added under this provision will be incorporated into Table II at the earliest ARACT review required by Provision 3.
  - B. Use new production coatings in categories listed in Table II, or which are allowed under Subparagraph A of this provision, provided the VOC contents of those coatings comply with the categorical limits. Information on any production coating added under this provision will be provided at the earliest ARACT review for incorporation into the background information document for this ARACT.

Compliance with this provision shall not relieve Bell from satisfying any applicable permit requirements under 30 TAC 116, concerning Permits.

13. Bell may petition the Executive Director of the TNRC to allow the addition of new emission sources and coatings at those sources which will not meet the applicable requirements of Chapter 115, §§115.421(a), 115.423(a)(3) or 115.910 provided they are coatings already approved on Table II of this ARACT. Approval of such a petition will not constitute an amendment of this ARACT provided the following requirements are met:

- A. The aggregate use of coatings at all sources added through this provision and which have not been available for public comment is limited to an aggregate of five tons of VOC emissions during any consecutive 12-month period.
- B. Prior to adding sources affected by this provision, Bell must receive express written notice from the TNRCC that the Executive Director has approved the petition for the addition of those sources. Such approval by the TNRCC will not be granted any earlier than 45 days after certified receipt of the petition to ensure adequate comment time for U. S. Environmental Protection Agency (EPA) Region 6 and any local air pollution program having jurisdiction. Within 30 days after certified receipt of the petition, the Executive Director will determine whether the information required by the petition is complete. A determination of approval or disapproval will be made by the TNRCC Executive Director within 60 days after the information supplied by Bell for the petition has been deemed complete. Approval by the TNRCC will not protect Bell from later timely denial by EPA and subsequent voiding of approval by the TNRCC.
- C. Bell must send a copy of a petition affected by this provision to the TNRCC Region 4 office in Arlington, Engineering Services Section at the TNRCC Austin office, EPA Region 6 office in Dallas, and any local air pollution control program having jurisdiction.
- D. A petition for a source to be added, per this provision, must include justification that the coatings proposed to be used at the source have the VOC limits which are the lowest possible, taking into account technical feasibility and economic reasonableness. Such justification will, at a minimum, include verification that no low-solvent coating alternatives for work performed at the source exist and that no add-on control options exist that are technically feasible and economically reasonable. The petition must also include a listing of specific coatings to be used at the source.

Adherence to the guidelines detailed above will not guarantee approval by the TNRCC Executive Director of a petition made per this provision. Denial of a petition may be made by EPA. Within 15 days after TNRCC approval, EPA may notify the TNRCC of the EPA disapproval of the petition. Such notification shall be in writing and shall include a statement of the reason(s) for the disapproval and a specific listing of changes to the petition which might make the petition acceptable. Upon receipt of a timely disapproval, the Executive Director shall notify Bell of the disapproval. A petition is considered acceptable by EPA if EPA provides notification to the Executive Director that no EPA disapproval is forthcoming, or EPA does not provide written notice of denial within 15 days after the TNRCC's approval. Compliance with this provision shall not relieve Bell from satisfying any applicable permit requirements under 30 TAC 116.

- 14. Sources approved under Provision 13 will be listed on the attached Table III and the TNRCC will formally notify EPA Region 6 of any sources approved per Provision 13. A source may be removed from the five ton aggregate limitation, and subsequently moved from Table III to Table I, by amending this ARACT which will require public hearing and approval by EPA Region 6.
- 15. All coating operations except those which occur in the Blade Paint Shop, the Maintenance Shop, the Hobby Shop, and the Loft (Tooling) shall use high-volume/low pressure, electrostatic, or air brush application equipment. Aerosol coating operations shall be exempted from this provision. An exception will be made for the use of conventional paint application equipment for spraying DuPont Imron paint onto commercial helicopters in the helicopter paint shop.

16. All coating operations in the Adhesive Prime Booth and in the Blade Paint Shop shall be applied with automatic equipment except the coating operations to the leading and trailing edges and to the ends of the helicopter blades, at times in which the automatic equipment is inoperative, during touch-up, abnormal production or testing applications. In such instances, application will occur with equipment with an advertised transfer efficiency of 60% or higher. Failed equipment shall be repaired or replaced within 14 calendar days of failure.
17. All emissions from the Blade Paint Shop will be routed to a carbon concentrator/incineration system (KPR) control unit which obtains a minimum device control efficiency of 90%. The KPR control unit is a hybrid control consisting of a rotating carbon cylinder and a subsequent catalytic incinerator which achieves the final destruction of the emissions. If the KPR control unit is down, the work load in the Blade Paint Shop may occur in the Rotor Touch-Up Booth.
18. All emissions from the Rotor Touch-up Booth will be routed to activated carbon canisters which achieve a minimum of 85% device control efficiency. The 85% control efficiency is assumed to be achieved when the VOC concentration is 100 parts per million by volume (ppmv) or less at 100% volume of the carbon bed unless the company demonstrates to the satisfaction of the Executive Director that the control efficiency requirement is met at a higher concentration. The granular activated carbon shall be replaced using the following procedures.
  - A. Monitoring shall be performed at least monthly under normal operating condition in the Rotor Touch-Up Booth to determine the VOC concentrations as methane or n-hexane from each carbon canister. Each activated carbon canister shall be sampled at 70%, 90% and 100% volume of the carbon bed. The monitoring must comply with Title 40 Code of Federal Regulations, Part 60 (40 CFR 60), Appendix A, Method 21 (Determination of VOC leaks). In the event that the KPR control unit is down and the work load in the Blade Paint Shop is transferred to the Rotor Touch-Up Booth, the above monitoring shall be performed within 24 hours after the work load transfer. Monitoring shall be done weekly thereafter for the duration that the Blade Paint Shop work load continues in the Rotor Touch-up Booth. Within 24 hours after the KPR unit is in operation and the work load has been transferred back to the Blade Paint Shop, the activated carbon canisters shall be monitored to determine the saturation level. If the level is less than 90% volume of the carbon bed, monitoring may be resumed on a monthly basis.

In lieu of 40 CFR 60 Appendix A, Method 21, the above monitoring may be performed using 40 CFR 60, Appendix A, Method 25A or 25B.

- B. Once the VOC concentration is determined to be equal to or greater than 100 ppmv as methane or n-hexane from any carbon canister at 90% volume of the carbon bed, the granular activated carbon within the affected canister shall be replaced within 14 days from the day that the VOC concentration is detected as 100 ppmv or above.
- C. After each granular activated carbon replacement, monitoring according to the schedule in (A) of this provision shall be performed within 24 hours after the affected carbon canister is in service.
- D. The frequency of monitoring specified in (A) of this provision may be reduced by the Executive Director of TNRCC at the request of Bell if a saturation indicator, which is approved by the TNRCC, is installed in the carbon canister to detect the breakthrough of the carbon bed, or if

sufficient monitoring data has been accumulated through implementation of (A) to justify the reduction.

19. The following records from the last ARACT review will be maintained at the plant site and be made readily available at the request of personnel of the TNRCC or any air pollution control agency with jurisdiction. These records may, at the discretion of any air pollution control program having jurisdiction, be used to determine violations of the limitations in Provision 11. Nothing in this paragraph shall limit any permit requirements that may become applicable.
  - A. Daily solvent (wipe solvent or otherwise) and coating use and the VOC content, as applied, of the coatings will be tracked for each coating source. At a minimum, solvent use at each source will be segregated into the amounts and type used for wipe solvent, spray-gun cleaning, diluent, and other. A source will be considered to be a booth, or the series of booths within the Helicopter Paint Shop, or in areas with no booth the distinguishable production area.
  - B. The data recorded in Provision 19(A) will be reduced monthly and a report produced monthly that represents coating emissions on a daily basis and tons emitted for the previous 12-month period.
  - C. Records of the KPR operating times and temperatures will be tracked.
  - D. Records of the activated carbon canister monitoring and inspection results shall be kept.
  - E. The daily, monthly, and annual records required in Provisions 19(A) through (D) will be kept in a central location with examples of the method of data reduction including units, conversion factors, assumptions, and the basis of the assumptions.
20. All waste paint and solvents from coating operations will be stored in closed containers until removed to the Bell Part B permitted Treatment Storage and Disposal Facility (TSDF) or recycled in a manner that minimizes air emissions.
21. All spills of coatings or solvents will be cleaned up immediately and the waste materials, rags and other absorbent materials will be stored in closed containers until removed from the site to the Bell Part B permitted TSDF or recycled in a manner that minimizes air emissions.
22. All paint gun cleanup from coating operations will be performed in systems located near the paint booths that totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing and draining procedures, except when cleaning pots and transfer lines, in the event of equipment failure, or temporary unavailability of equipment. In these cases, cleaning solvent will be directed into closed containers using procedures that reduce fugitive emissions. Failed equipment shall be repaired or replaced within 14 calendar days of failure.
23. Upon receiving authorization under 30 TAC Chapter 116, §116.111, Bell shall begin testing, and where feasible, implementing a low vapor pressure wipe solvent cleaning system which complies as follows.
  - A. The wipe solvent will have a vapor pressure less than 5 mm of mercury at 25°C.

- B. The wipe solvent will be contained in dispensers (e.g., plunger cans, pre-saturated wipe dispensers, etc.) which prevent evaporation of the solvents from occurring until ready for use.
  - C. Immediately after use soiled wipers will be placed into sealed step cans until removed from the coating operation site in accordance with Resource Conservation and Recovery Act (RCRA) requirements.
  - D. Wipers will only be exposed to the ambient atmosphere while in use.
  - E. Complete conversion to the wipe solvent cleaning system in the Helicopter Paint Shop will occur within three months of the TNRCC approval of this ARACT or authorization under 30 TAC Chapter 116, §116.111, whichever is latest.
  - F. Final analysis of conversion of other operations in the facility which can be converted to the low vapor pressure wipe solvent will be addressed in the first ARACT review required under Provision 3.
24. A training program to educate wipe solvent users on appropriate wiper handling and the environmental importance of the low vapor pressure wipe solvent system will be developed by the company. New employees will be trained when initially beginning work in an area using wipe solvent and all applicable employees will be retrained annually. This retraining may occur during annual RCRA training.

#### **ATTACHMENTS**

- Table I: ARACT EMISSION POINT NUMBERS AND FACILITY IDENTIFICATION NUMBERS
- Table II: ARACT COATING LIMITATIONS
- Table III: SOURCES ADDED PER PROVISION 13

**TABLE I**

**ARACT EMISSION POINT NUMBERS & FACILITY IDENTIFICATION NUMBERS**

**Texas Natural Resource Conservation Commission  
Account No. TA-0054-T**

<b><u>Production Equipment Description</u></b>	<b><u>Bldg</u></b>	<b><u>FIN</u></b>	<b><u>EPN(S)</u></b>
Conveyor Prime Booth	36	PNT 47 CONVVP	60A, 60B, 88
Detail Parts Booth	36	PNT 47 DETPT	24
Cabin Prime Booth	36	PNT 73 CABIN	53-1 to 53-6
Adhesive Prime Booth	2	APSB	21A, 21B, 21C
Maintenance Shop	20	PNT 36 MAINT	14
Hobby Shop	25	PNT 81 HOBBY	66
The Loft (Tooling)	21	P-40	13
Helicopter Paint Shop	30	PNT 55 FINAL	23-1 to 23-30
Upholstery Shop	30	PNT 77 UPHOL	61
Blade Paint Shop	2	P-65-B	K1, K2
Rotor Touch-Up Booth	2	PNT 65 TRT 10	

**TABLE II**

**ARACT COATING LIMITATION**

**Texas Natural Resource Conservation Commission  
Account No. TA-0054-T**

<b><u>Production Equipment Description</u></b>	<b><u>Coating Category</u></b>	<b><u>Limit (lbs VOC/gal coating)</u></b>
Conveyor Prime Booth	Water-Based Primer	2.9
Detail Parts Booth	Conductive Coating	6.0
	Epoxy Sanding Surfacer	5.0
	Urethane Enamel	5.4
	Water-Based Primer	2.9
	Walkway Coating	4.3
	Aerosol	6.8
	Lacquer	6.9
	Epoxy Coating	5.4
Cabin Prime Booth	Fuel Cell Coating	5.5
	Conductive Coating	6.0
	Water-Based Primer	2.9
	Epoxy Sanding Surfacer	5.0
	Fuel Cell Coating	5.5
	Urethane Enamel	5.4
	Walkway Coating	4.3
	Lacquer	6.9
	Aerosol	6.8
	Epoxy Coating	5.4
Adhesive Prime Booth	Adhesive Primer	6.9
Maintenance Shop	Aerosol	6.8
	Lacquer	6.9
	Latex	0.7
	Acrylic Enamel	2.9
	Epoxy	2.5
Hobby Shop	Aerosol	6.8
	Urethane Enamel	5.4
The Loft (Tooling)	Urethane Enamel	5.4
	Aerosol	6.8

**TABLE II - CONTINUED**

**ARACT COATING LIMITATION**

**Texas Natural Resource Conservation Commission  
Account No. TA-0054-T**

<b><u>Production Equipment Description</u></b>	<b><u>Coating Category</u></b>	<b><u>Limit (lbs VOC/gal coating)</u></b>
Helicopter Paint Shop	Conductive Coating	6.0
	Fuel Cell Coating	5.5
	Epoxy Sanding Surfacer	5.0
	Urethane Enamel	5.4
	Water-Based Primer	2.9
	Walkway Coating	4.3
	Aerosol	6.8
	Lacquer	6.9
	Epoxy Coating	5.4
Upholstery Shop	Adhesive	5.9
Blade Paint Shop	Conductive Coating	6.0
	Urethane Enamel	5.6
	VOC-Based Primer	5.6
Rotor Touch-Up Booth	Lacquer	6.9

**TABLE III**

**SOURCES ADDED PER PROVISION 13**

**Texas Natural Resource Conservation Commission  
Account No. TA-0054-T**

<u>Production Equipment Description</u>	<u>EPNS</u>	<u>FINS</u>	<u>Coating Category</u>	<u>Limit (lbs VOC/gal coating)</u>
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Unless incorporated into Table I through an amendment to this ARACT, the aggregate VOC emissions from sources listed on this table shall not exceed five (5) tons during any consecutive 12-month period.