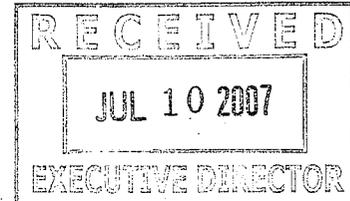


Air & Waste Engineering, Inc.
2000 Dairy Ashford, Suite 230
Houston, Texas 77077
(281) 493-5399 FAX (281) 493-5699
July 9, 2007



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

FEDEX

**Re: Petition for Rulemaking Dated June 14, 2007
Southwest Spray, Inc.**

Dear Mr. Shankle:

This relates to the Petition for Rulemaking dated June 14, 2007 submitted on behalf of Southwest Spray, Inc. ("Southwest Spray").

Bell Helicopter ARACT:

A document entitled "TEXAS NATURAL RESOURCE CONSERVATION COMMISSION SITE-SPECIFIC STATE IMPLEMENTATION PLAN REVISION - BELL HELICOPTER TEXTRON INCORPORATED" has come to our attention. The document is undated, but is believed to have been issued in 1995 or 1996. The rule change allows for a site specific control technology for Bell Helicopter. This was incorporated into the Texas SIP by the EPA in 40 CFR 52.2299(c) (100).

In Page 8 (copy enclosed) of the Provisions - Table II, the Plan allows emissions from the "Detail Parts Booth". If the "Walkway Coating", which is obviously for larger parts, is removed, the average coating content for the remaining parts is 5.49 pounds of VOC per gallon (PVPG).

Bell's ARACT plan was withdrawn because the TCEQ incorporated the Aerospace CTG/RACT into 30 TAC 115.421. However, the Aerospace CTG/RACT limits, which were incorporated into Chapter 115, are comparable to the limits in the aforementioned Bell ARACT plan.

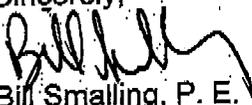
This relates to our request because the "Detail Parts Booth" is likely for the smaller parts at the Bell plant. Additionally, the "Detail Parts Booth" in the Bell ARACT plan furnishes a template for Southwest Spray's requirements for its

Mr. Glenn Shankle, Executive Director
Texas Commission on Environmental Quality
Petition for Rulemaking Dated June 14, 2007
Southwest Spray, Inc.
Page 2

fastener coating operations. In fact, the parts coated by Southwest Sprays are likely much smaller than even the parts coated by this booth. The average VOC content of the paint used by the booth approximates our requested 5.75 PVPG. This is germane to our request because it supports our contention that very small parts can only be coated effectively with higher VOC content coating.

We respectfully, request that the petition for rulemaking dated June 14, 2007 be approved. If you have any questions, please contact us at (281) 493-5399.

Sincerely,


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

BSm/dv

Enclosure

Cc: Ms. Teresa Hurley, TCEQ, MC-206

Jim Rainey, Southwest Spray, Inc.

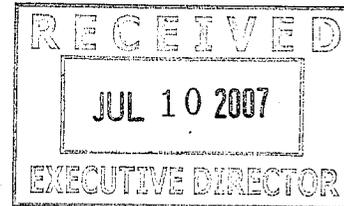


TABLE II
ARACT COATING LIMITATION

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

<u>Production Equipment Description</u>	<u>Coating Category</u>	<u>Limit (lbs VOC/gal coating)</u>
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
	Fuel Cell Coating	5.5
Cabin Prime Booth	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