

# PERMIT BOOK

STATE OF MISSOURI



## DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

### PERMIT TO CONSTRUCT

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to construct the air contaminant source(s) described below, in accordance with the laws, rules and conditions as set forth herein.

Permit Number: **07 2 0 1 0 - 0 0 8** Project Number: 2010-05-004

Parent Company: Brunswick Corp.

Parent Company Address: 1 North Field Court, Lake Forest, IL 60045

Installation Name: Lowe Boats, Inc.

Installation Number: 105-0006

Installation Address: 2900 Industrial Drive, Lebanon, MO 65536

Location Information: Laclede County, S27, T34N, R16W

Application for Authority to Construct was made for:  
Addition of four paint booths. This review was conducted in accordance with Section (6),  
Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

- 
- Standard Conditions (on reverse) are applicable to this permit.
- Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

JUL 22 2010

EFFECTIVE DATE

Handwritten signature of Kyla L. Moore in cursive script.

DIRECTOR OR DESIGNEE  
DEPARTMENT OF NATURAL RESOURCES

## STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

**You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review.** In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Departments' Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available within 30 days of actual startup. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.

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**SPECIAL CONDITIONS:**

The permittee is authorized to construct and operate subject to the following special conditions:

*The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."*

Lowe Boats, Inc.  
Laclede County, S27, T34N, R16W

1. **Superseding Condition**  
The conditions of this permit supersede Special Condition 1 found in the previously issued Permit Number 092002-011 issued by the Air Pollution Control Program.
2. **Emission Limitation – Volatile Organic Compounds (VOCs)**
  - A. Lowe Boats, Inc. shall emit less than 249.0 tons of VOCs in any consecutive 12-month period from the entire installation. This limit applies to the VOC emissions from all equipment/ processes installed or permitted at Lowe Boats, Inc. as of the date of this permit. Table 1 lists all known VOC emission sources at the Lowe Boats facility.

**Table 1: VOC Emission Sources at Lowe Boats**

<b>Emission Unit</b>	<b>Description</b>
EU0020	Paint Room #1 - Primer Booth
EU0030	Paint Room #1 - Top Coat Booth
EU0040	Paint Room #2 – Primer Booth
EU0050	Paint Room #3 – Top Coat Booth
EU0060	Paint Room #2 - Multipurpose Booth
EU0070	Boat Assembly/Solvent Usage
EU0080	Other Cleaning Solutions
EU0090	Carpet Gluing 12
EU0100	Carpet Gluing 12A
EU0110	Carpet Gluing 12B
EU0120	Non-Carpet/Fabric Adhesive Operations
EU0130	Paint Room #1 - Drying Oven
EU0140	Paint Room #3 - Paint Booth Drying Oven
EU0150	Paint Room #2 - Drying Oven
EU0160	Paint Room #3 - Wash Booth Drying Oven
EU0180	Paint Room #2 - Spray Booth Poly
EU0190	Paint Room #2 - Spray Booth Topcoat
EU0200	Paint Room #3 - Spray Booth Primer
EU0210	Paint Room #3 - Multi-Purpose Booth

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**SPECIAL CONDITIONS:**

The permittee is authorized to construct and operate subject to the following special conditions:

- B. Attachment A or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Condition 2.A.
3. Use of Alternative Coatings in Paint Booths (EU0180, EU0190, EU0200, and EU0210)
- A. When considering using an alternative material in the new paint booth that is different than a material listed in the Application for Authority to Construct, Lowe Boats, Inc. shall calculate the potential emissions of volatile organic compounds (VOCs) and each individual HAP in the alternative material for the project.
  - B. Lowe Boats, Inc. shall seek approval from the Air Pollution Control Program before use of the alternative material in the following cases:
    - 1) If the project's potential VOC emissions with the use of an alternative material is equal to or greater than 100.9 tons per year (tpy).
    - 2) If the potential individual HAP emissions for the alternative material is equal to or greater than the Screening Model Action Levels (SMAL) for any compound listed in Appendix B.
  - C. Lowe Boats, Inc. shall use the pre-approved electronic spreadsheet as shown in Appendix A or an equivalent approved recordkeeping page to show compliance with Special Condition 3.A and 3.B.
4. Control Device Requirements
- A. Lowe Boats, Inc. shall control emissions from each spray gun using a paint booth equipped with high efficiency filters. The paint booths (EU0180, EU0190, EU0200, and EU0210) and high efficiency filters (CD8, CD9, CD10, and CD11) shall be maintained in accordance with the manufacturer's specifications. Replacement filters shall be kept on hand at all times.
  - B. Only one spray gun may be operated in each paint booth at a time.
  - C. Lowe Boats, Inc. shall not replace the spray guns or modify the spray guns such that the current application rates as given in the application are exceeded.

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**SPECIAL CONDITIONS:**

The permittee is authorized to construct and operate subject to the following special conditions:

5. **Operational Requirement**  
Lowe Boats, Inc. shall keep all VOC and HAP emitting solvents, paints, and cleaning solutions in sealed containers whenever the materials are not in use. Lowe Boats, Inc. shall provide and maintain suitable, easily read, permanent markings on all VOC and HAP emitting solvent, paints and cleaning solution containers used with this equipment.
6. **Record Keeping and Reporting Requirements**
  - A. Lowe Boats, Inc. shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used.
  - B. Lowe Boats, Inc. shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE  
SECTION (6) REVIEW

Project Number: 2010-05-004  
Installation ID Number: 105-0006  
Permit Number:

Lowe Boats, Inc.  
2900 Industrial Drive  
Lebanon, MO 65536

Complete: May 3, 2010

Parent Company:  
Brunswick Corp.  
1 North Field Court  
Lake Forest, IL 60045

Laclede County, S27, T34N, R16W

REVIEW SUMMARY

- Lowe Boats, Inc. has applied for authority to install four additional paint booths (EU0180, EU0190, EU0200, and EU0210).
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment. HAPs of concern from this process are all isomers of xylenes (CAS #1330-20-7), ethyl benzene (CAS #100-41-4), methyl isobutyl ketone (CAS #108-10-1), toluene (CAS #108-88-3), cobalt carboxylate mixture (CAS #27253-31-2) and diphenylmethane-4,4-diisocyanate (also known as "MDI", CAS #101-68-8).
- None of the New Source Performance Standards (NSPS) apply to the installation.
- 40 CFR Part 63, Subpart VVVV, *National Emission Standards for Hazardous Air Pollutants for Boating Manufacturing*, applies to the installation.
- The paint booths are equipped with high efficiency filters in order to control particulate matter emissions from the spray gun overspray.
- This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of VOCs for the project are above de minimis levels. The entire installation has been conditioned to less than 250 tons of VOC per year. All other criteria pollutants for the project are below de minimis levels.
- This installation is located in Laclede County, an attainment area for all criteria pollutants.
- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and

fugitive emissions are not counted toward major source applicability.

- VOC and PM<sub>10</sub> ambient air quality modeling was not performed for this review for the following reasons: 1) No model is currently available which can accurately predict ambient ozone concentrations caused by this installation's VOC emissions. 2) No modeling needed on PM<sub>10</sub> since potential PM<sub>10</sub> emissions of the application are below de minimis levels.
- Modeling was performed on xylenes and MDI since the potential emissions of each exceeded their respective Screening Model Action Levels (SMALs).
- Emissions testing is not required for the new equipment.
- An amendment to your Part 70 Operating Permit is required for this installation within 1 year of equipment startup.
- Approval of this permit is recommended with special conditions.

## INSTALLATION DESCRIPTION

Lowe Boats, Incorporated (Lowe Boats) operates an aluminum boat manufacturing plant in Lebanon, Missouri. The operation consists of metal fabrication, woodworking, surface coating, adhesive application, solvent wipedown, drying ovens and general assembly and storage of the finished units. Lowe Boats is an existing major source of HAPs and is conditioned to below major source levels for VOC emissions.

This installation was issued a Part 70 Operating Permit No. OP2007-032 in July of 2007. The following construction permits have been issued to Lowe Boats from the Air Pollution Control Program.

Table 2: Previously Issued Construction Permits

Permit Number	Description
1097-005	Installation of plywood cutting (EP05), paint booth (EP10), carpet gluing (EP12), solvent usage (EP15), welding (EP19), and plasma cutters (EP20).
092002-011	Installation of two new paint booths and relocation of the existing carpet gluing operations to different areas within this aluminum boat manufacturing plant.
022004-002	Addition of a third wash booth at the installation.
042005-008	Addition of pneumatic spray equipment to an existing paint booth.

## PROJECT DESCRIPTION

Lowe Boats is seeking authority to add two spray booths to Paint Room #2 and two spray booths to Paint Room #3. Currently, in Paint Room #2, they are applying all primer and topcoat to the boats in the existing paint booth, EU0040. With this project, they will add two spray booths, EU0180 and EU0190, one dedicated to applying a polyurea liner and the other for applying topcoat. The existing spray booth will be changed to a primer only spray booth.

For Paint Room #3, they are currently applying all primer and topcoat in the existing spray booth, EU0050. With this project, they will add two spray booths, EU0200 and EU0210 to Paint Room #3. The first one will be dedicated to primer application and the existing spray booth, EU0050, will be changed to a dedicated topcoat spray booth. Solvent is used at EU0050 to flush the paint line and to clean the paint guns. The existing multi-purpose spray booth, EU0060, which was originally servicing both paint rooms, will now be dedicated to Paint Room #2 and a new multipurpose spray booth (EU0210) is being added to Paint Room #3. The multi-purpose booths are used for touch-up purposes.

Table 3: New Emission Units

Paint Room #2		
EU0180	Spray Booth Poly	CD8 – Panel Filter
EU0190	Spray Booth Topcoat	CD9 – Panel Filter
Paint Room #3		
EU0200	Spray Booth Primer	CD10 – Panel Filter
EU0210	Multi-Purpose Booth	CD11 – Panel Filter

Each new paint booth will operate only one spray gun at a time. The addition of these booths/guns is necessary to improve efficiency, increase throughput through the paint line, and improve cycle time of the paint lines. However, due to the bottleneck nature of the assembly portion of the plant, the manufacturing rate of boats is not expected to increase.

Since the potential emissions for the paint rooms themselves may increase, this project was viewed as a modification to the existing paint rooms and potential emissions associated with existing spray booths, EU0040 and EU0050, are included in the project’s potential emissions. The drying ovens associated with these paint rooms are not considered to be modified since actual combustion of fuel in the drying ovens will not increase as a result of this project.

In the event of a modification, a potential minus actuals calculation can be used to determine the project’s potential emission increase. However, a potential minus actuals test was not conducted in this case since the subtraction of a 2-year average actual emissions would not change the type of review needed for this permit.

The maximum hourly design rates for the coatings applied in the paint rooms are indirectly limited by the number of boats that can be manufactured. Boat production rates were derived from maximum production levels. The maximum coating usages are based on the amount of product used per boat (see Table 4). The maximum boat production for the lines containing Paint Room #2 and Paint Room #3 are 0.5 and 1.2 boats per hour, respectively. In Paint Room #2, the amount and types of coating product used is dependent on the paint manufacturer (PPG and Niles).

Table 4: Product Usage per Boat (gallons per boat)

Coating	Paint Room #2 PPG	Paint Room #2 Niles	Spray Booth	Paint Room #3 Niles	Spray Booth
Paint	0.62	2.8	EU0190	0.62	EU0050
Hardener	0.31	--	EU0190	0.31	EU0050
Reducer	0.08	--	EU0190	0.08	EU0050
Primer	0.43	0.5	EU0040	0.43	EU0200
Catalyst	0.07	--	EU0040	0.07	EU0200
Solvent	--	--	N/A	0.83	EU0050
Gatorhyde lining HP82 A	2	2	EU0180	--	N/A
Gatorhyde lining HP82 B	2	2	EU0180	--	N/A

N/A=Not Applicable

Low Boats estimates that less than 20 percent of the total boats produced will receive a polyurea liner. Since no limits are being put on the amount of boats receiving the liner, the potential emissions are based on the assumption that all boats will receive the liner.

#### EMISSIONS/CONTROLS EVALUATION

The project's potential emissions are primarily VOCs and HAPs that are associated with coating applied in the new spray booths (EU0180, EU0190, EU0200 and EU0210) and existing spray booths (EU0040 and EU0050). However, some PM<sub>10</sub> is emitted from the solids contained in coatings. A description of the emission factors sources and calculation methods are described as follows.

- Potential emissions were estimated using a mass balance approach and information obtained from the Material Safety Data Sheets (MSDS).
- 100 percent of the VOC and HAP content of the paints, primers, hardeners, reducer, polyurea liner and solvents are assumed to be emitted into the atmosphere.
- PM<sub>10</sub> emissions and non-VOC HAPs from the application of the coatings were evaluated based on the solids and the individual non-VOC HAP content of the paint as well as the transfer efficiency from the spray application. A 50% transfer efficiency was used for the air assisted spray guns used on the PPG paint (Paint Room #2) and primer used in Paint Room #3. A 75% transfer efficiency was used for the airless gun used with the Niles paint (Paint Room #2) and for the electrostatic gun used for paint in Paint Room #3. If not specifically stated in the MSDS, the solids content of the material was estimated by taking the density of the material and subtracting out the volatile content. The remainder was assumed to be PM<sub>10</sub>. A control efficiency of 95% was given for use of high efficiency filters in each of the paint booths.
- According to the manufacturer of the polyurea liner, the MDI portion (a HAP) of the coating remains a solid up to a temperature in excess of 122 °F. Since the lines is being applied at room temperature and is not subject to heat in excess of 122 °F, the MDI is being treated as a particulate and therefore its emission were estimated in the same manner as PM<sub>10</sub>.
- The potential emissions for total VOCs, combined HAPs, each individual HAP and PM<sub>10</sub> were evaluated based on the worst case potential emissions for each type of

coating.

The following table provides an emissions summary for this project. Existing potential emissions were taken from Permit Number 042005-008. Existing actual emissions were taken from the installation's 2009 Emission Inventory Questionnaire (EIQ). Potential emissions of the application represent the potential of the equipment associated with the new spray booths and the affected existing spray booths as described above: All potential emissions assume continuous operation (8,760 hours per year).

Table 5: Emissions Summary (tons per year)

Pollutant	<sup>1</sup> Regulatory De Minimis Levels	<sup>2</sup> Existing Potential Emissions	Existing Actual Emissions (2009 EIQ)	Potential Emissions of the Application	Installation Conditioned Potential
PM <sub>10</sub>	15.0	N/D	0.14	3.07	N/A
SOx	40.0	N/D	0.00	N/A	N/A
NOx	40.0	N/D	0.00	N/A	N/A
VOC	40.0	<249.0	23.63	100.86	<249.0
CO	100.0	N/D	0.00	N/A	N/A
HAPs	10.0/25.0	Major	N/D	19.13	<sup>3</sup> Subpart VVVV
Xylenes	10.0	N/D	N/D	14.22	<sup>3</sup> Subpart VVVV
MIBK	10.0	N/D	N/D	1.29	<sup>3</sup> Subpart VVVV
Ethyl Benzene	10.0	N/D	N/D	3.08	<sup>3</sup> Subpart VVVV
MDI	0.1	N/D	N/D	0.10	<sup>3</sup> Subpart VVVV
Cobalt compounds	0.1	N/D	N/D	1E-04	<sup>3</sup> Subpart VVVV

N/A = Not Applicable; N/D = Not Determined

<sup>1</sup> The regulatory levels listed for individual HAPs are Screening Model Action Levels (SMAL).

<sup>2</sup>The installation was permitted with a plantwide limit of 249 ton per year VOCs in Construction Permit No. 042005-008 and Operating Permit No. OP2007-032.

<sup>3</sup>40 CFR Part 63, Subpart VVVV contains HAP emission limitations for aluminum surface coating operations. The MACT regulation limits the weighted-average organic HAP content for all aluminum coating materials in the aluminum surface coating operations. The specifics of the emission limits can be found at 40 CFR §63.5743.

## PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of VOCs for the project are above de minimis levels. The entire installation has been conditioned to less than 250 tons of VOC per year. All other criteria pollutants for the project are below de minimis levels.

## APPLICABLE REQUIREMENTS

Lowe Boats, Inc. shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved.

### GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information, 10 CSR 10-6.110*  
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required June 1 for the previous year's emissions.
- *Operating Permits, 10 CSR 10-6.065*
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin, 10 CSR 10-6.170*
- *Restriction of Emission of Visible Air Contaminants, 10 CSR 10-6.220*
- *Restriction of Emission of Odors, 10 CSR 10-3.090*

### SPECIFIC REQUIREMENTS

- *Maximum Achievable Control Technology (MACT) Regulations, 10 CSR 10-6.075, National Emission Standards for Hazardous Air Pollutants for Boating Operations, 40 CFR Part 63, Subpart VVVV*

## AMBIENT AIR QUALITY IMPACT ANALYSIS

The xylenes and MDI potential emissions exceeded their respective Screening Model Action Levels. A Screen 3 modeling analysis was performed to determine if the Risk Assessment Levels for xylenes and MDI would be exceeded at or beyond the property line of the Lowe Boats facility. The stack parameters and the nearest property boundary from each stack as provided by the applicant are listed in Table 6. For this project, xylene has the potential to be emitted from EU00190, EU0040, EU0050 and EU0200. MDI is emitted from spray booth EU0180. Modeled emission rates for xylene and MDI as well as the modeled impact obtained from Screen 3 are summarized in Table 7.

Table 6: Stack Parameters

Stack No.	Height (ft)	Diameter (ft)	Temperature (F)	Flowrate (acfm)	Nearest Property Boundary (ft)
EU0190	20	4	77	17,570	193.5
EU0040	20	4	77	17,570	217.7
EU0050	20	4	77	17,570	183.8
EU0200	20	4	77	17,570	149.25
EU0180	20	4	77	17,570	217.7

Table 7: Ambient Air Quality Impact Analysis

Pollutant	Stack No.	Emission Rate (lb/hr)	Modeled Impact ( $\mu\text{g}/\text{m}^3$ )	Risk Assessment Level ( $\mu\text{g}/\text{m}^3$ )	Time Period			
Xylene	EU0190	0.296						
	EU0040	0.072						
	EU0050	0.006						
	EU0200	0.35						
	<b>Total</b>					52.69	250.0	24-hour
	<b>Total</b>					10.54	11.8	Annual
MDI	EU0180	0.023	1.86	2.667	8-hour			

As indicated in the above table, the xylene and MDI emissions from the emission units added or modified under this permit are expected to be in compliance with the Risk Assessment Levels for all averaging time periods.

### STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

\_\_\_\_\_  
Susan Heckenkamp  
Environmental Engineer

\_\_\_\_\_  
Date

### PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated April 26, 2010, received May 3, 2010, designating Brunswick Corp. as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Southwest Regional Office Site Survey, dated May 21, 2010.

**Attachment A - VOC Compliance Worksheet**

Lowe Boats, Inc.  
 Laclede County, S27, T34N, R16W  
 Project Number: 2010-05-004  
 Installation ID Number: 105-0006  
 Permit Number:

This sheet covers the period from \_\_\_\_\_ to \_\_\_\_\_.  
 (month, year) (month, year)

Column 1	Column 2 (a)	Column 3	Column 4	Column 5
Material Used (Name, Type)	Amount of Material Used (Include Units)	Density (lbs/gal)	VOC Content (Weight %)	VOC Emissions (Tons)
Fuel Usage	Monthly Amount of Fuel Combusted (1,000 gallons)		VOC Emission Factor (lb/1,000 gal)	VOC Emissions (Tons)
			0.05	
(b) Total VOC Emissions Calculated for this Month in Tons:				
(c) 12-Month VOC Emissions Total from Previous Month's Attachment A, in Tons:				
(d) Monthly VOC Emissions Total (b) from Previous Year's Attachment A, in Tons:				
(e) Current 12-month Total of VOC Emissions in Tons: [(b) + (c) - (d)]				

**Instructions: Choose appropriate VOC calculation method for units reported:**

(a) 1) If usage is in tons - [Column 2] x [Column 4] = [Column 5];  
 2) If usage is in pounds - [Column 2] x [Column 4] x [0.0005] = [Column 5];  
 3) If usage is in gallons - [Column 2] x [Column 3] x [Column 4] x [0.0005] = [Column 5].  
 4) For fuel usage in 1,000 gallons - [Column 2] x [Column 4] x [0.0005] = [Column 5];

(b) Summation of [Column 5] in Tons;  
 (c) 12-Month VOC emissions total (e) from last month's Attachment A, in Tons;  
 (d) Monthly VOC emissions total (b) from previous year's Attachment A, in Tons;  
 (e) Calculate the new 12-month VOC emissions total. **A 12-Month VOC emissions total (e) equal to or less than 249.0 tons indicates compliance.**

# Appendix A

## Alternative Coatings Calculation Sheet

# Appendix B

## **Table of Hazardous Air Pollutants, Screening Model Action Levels, and Risk Assessment Levels, Rev 4**