PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR PROGRAM

33 N. Stone Avenue, Suite 700 • Tucson, Arizona 85701 • Phone: (520) 724-7400

AIR QUALITY OPERATING PERMIT

(As required by Title 17.12, Article II, Pima County Code)

ISSUED TO

INTER-FAB, INC.
3050 S. ALVERNON WAY
TUCSON, ARIZONA 85713

This air quality operating permit does not relieve applicant of responsibility for meeting all air pollution regulations

THIS PERMIT ISSUED SUBJECT TO THE FOLLOWING: **Conditions contained in Parts A and B.**

PERMIT NUMBER **2905**

PERMIT CLASS **I**

ISSUED: **FEBRUARY 13, 2015**

EXPIRES: **FEBRUARY 12, 2020**

Rupesh Patel

Rupesh Patel, Air Permit Manager, PDEQ

SIGNATURE

TITLE

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SUMMARY

Inter-Fab, Inc. manufactures diving boards and pool slides for swimming pools, artificial rocks, boulders, fountains, waterfalls, and rock wall panels using plastic composites. The company also powder coats and oven cures stainless steel railings, steel diving board stands, steel springs, and miscellaneous bolts and hardware.

The manufacturing process uses fiberglass and thermoset resins and/or gel coats to produce the plastic composites. The air toxics emitted during the production of plastic composites are styrene and methyl methacrylate (MMA). These hazardous air pollutants (HAPs) are emitted at several points in the production of plastic composites, including resin and gel coat application, storage and mixing.

The company has reported to operate largely on a 10-hour per day schedule, four days per week (Monday through Thursday) - approximately 2080 hours per year.

EMISSION ESTIMATES

The following emission rates are included for reference purposes only and are not intended to be enforced by direct measurement unless otherwise noted herein.

The emissions represent the source's potential to emit based on information supplied by the Permittee in their August 2006 permit renewal application, 40 CFR 63 Subpart WWWW and material usage calculations operating in compliance with the provisions of this permit. These emissions shall not be considered as a case-by-case determination of an emission limit for the purpose of determining future permit revisions pursuant to Title 17 of the Pima County Code (PCC 17.12.255.A.3). Emission reductions achieved through add-on emission controls are not included in the determination of potential to emit.

Pollutant	Uncontrolled Emissions (Tons Per Year)	Controlled Emissions (Tons Per Year)
Volatile Organic Compounds (VOC)	104.5	90.0
Total Hazardous Air Pollutants (HAPs)	104.5	90.0

Inter-Fab, Inc. has proposed and accepted a synthetic minor emission limitation condition to control air toxic emissions of VOCs less than 100 tons/year; this establishes the facility as a minor source of VOC emissions for the Prevention of Significant Deterioration (PSD) program. Inter-Fab, Inc. also proposed and accepted a HAPs emission limitation to avoid the more stringent 95 percent emission reduction control requirement of the National Emission Standards for Hazardous Air Pollutants (NESHAP) rule.

AFFECTED EMISSION SOURCE CLASSIFICATION

The Infer-Fab facility is a Class I synthetic minor stationary source for HAPs and VOCs and true minor for all other pollutants. The source is subject to the provisions of 40 CFR 63 Subpart WWWW NESHAP “Reinforced Plastic Composites Production”, the Pima County State Implementation Plan (Pima County SIP) and Title 17 of the Pima County Code.

All terms and conditions of this permit are federally enforceable by the Administrator of the United States Environmental Protection Agency (U.S.EPA) under the Clean Air Act, except as otherwise noted.

PART A

GENERAL PROVISIONS

(References to A.R.S. are references to the Arizona Revised Statutes, references to A.A.C. are references to the Arizona Administrative Code, and references to PCC are references to Title 17 of the Pima County Code)

I. PERMIT EXPIRATION AND RENEWAL [PCC 17.12.180.A.1 & PCC 17.12.160.D.1]

A. This permit is valid for a period of five years from the date of issuance of the permit.

B. The Permittee shall submit an application for renewal of this permit at least 6 months, but not greater than 18 months prior to the date of permit expiration.

II. COMPLIANCE WITH PERMIT CONDITIONS [PCC 17.12.180.A.8.a and b]

A. The Permittee shall comply with all conditions of this permit including all applicable requirements of Arizona air quality statutes A.R.S. Title 49, Chapter 3, and Pima County air quality rules. Any permit noncompliance is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application. In addition, noncompliance with any federally enforceable requirement constitutes a violation of the Clean Air Act.

B. It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

III. PERMIT REVISION, REOPENING, REVOCATION AND REISSUANCE, OR TERMINATION FOR CAUSE [PCC 17.12.180.A.8.c & PCC 17.12.270]

A. The permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a permit revision, revocation and reissuance, or termination; or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

B. The permit shall be reopened and revised under any of the following circumstances:

1. Additional applicable requirements under the Clean Air Act become applicable to a major source with a remaining permit term of three or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to PCC 17.12.280.B. Any permit reopening required pursuant to this paragraph shall comply with provisions in PCC 17.12.280 for permit renewal and shall reset the five-year permit term.

2. Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Control Officer, excess emissions offset plans shall be deemed to be incorporated into the Class I permit.

3. The Control Officer or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

4. The Control Officer or the Administrator determines that the permit needs to be revised or revoked to assure compliance with the applicable requirements.

C. Proceedings to reopen and issue a permit, including appeal of any final action relating to a permit reopening, shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopenings shall be made as expeditiously as practicable. Permit reopenings for reasons other than those stated in paragraph III.B.1 of Part A shall not result in the resetting of the five-year permit term.

IV. POSTING OF PERMIT [PCC 17.12.080]

The Permittee who has been granted an operating permit or an Authorization to Operate (ATO) by PDEQ shall maintain a complete copy of the operating permit and ATO onsite. If it is not feasible to maintain a copy of the operating permit or ATO onsite, the Permittee may request, in writing, to maintain a copy of the permit at an alternate location. Upon written approval by the Control Officer, the Permittee must maintain a complete copy of the permit at the approved alternative location.

V. FEE PAYMENT [PCC 17.12.180.A.9 & PCC 17.12.510]

The Permittee shall pay fees to the Control Officer pursuant to PCC 17.12.510.

VI. ANNUAL EMISSIONS INVENTORY QUESTIONNAIRE [PCC 17.12.320]

A. When requested by the Control Officer, the Permittee shall complete and submit an annual emissions inventory questionnaire. The questionnaire is due by March 31 or ninety days after the Control Officer makes the inventory form available, whichever occurs later, and shall include emission information for the previous calendar year. These requirements apply whether or not a permit has been issued and whether or not a permit application has been filed.

B. The questionnaire shall be on a form provided by or approved by the control officer and shall include the information required by PCC 17.12.320.

VII. COMPLIANCE CERTIFICATION [PCC 17.12.220.A.2]

The Permittee shall submit to the Control Officer a compliance certification that describes the compliance status of the source with respect to each permit condition. Certifications shall be submitted as specified in Part B of this permit.

A. The compliance certification shall include the following:

1. Identification of each term or condition contained in the permit including emission limitations, standards, work practice, or management practices that are the basis of the certification.

2. Identification of the method(s) or other means used by the Permittee for determining the compliance status of the source with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required under PCC 17.12.180 (A)(3), (monitoring including the related recordkeeping and reporting requirements that verify compliance with the monitoring). If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the Clean Air Act, which prohibits knowingly making a false certification or omitting material information.

3. The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall identify each deviation and take it into account in the compliance certification.

4. For emission units subject to 40 CFR 64, the certification shall also identify as possible exceptions to compliance any period during which compliance is required and in which an excursion or exceedance defined under 40 CFR 64 occurred.

5. A progress report on all outstanding compliance schedules submitted pursuant to PCC 17.12.220; and

6. Other facts the Control Officer may require to determine the compliance status of the facility.

B. A copy of all compliance certifications for Class I permits shall also be submitted to the EPA Administrator. The address for the EPA Administrator is:

EPA Region 9 Enforcement Office, 75 Hawthorne St (Air-5), San Francisco, CA 94105

VIII. CERTIFICATION OF TRUTH, ACCURACY AND COMPLETENESS [PCC 17.12.220.A.3]

Any document required to be submitted by this permit, including reports, shall contain a certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required by this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

IX. INSPECTION AND ENTRY [PCC 17.12.220.A.4]

The Permittee shall allow the Control Officer or the authorized representative of the Control Officer upon presentation of proper credentials to:

A. Enter upon the Permittee's premises where a source is located or emissions-related activity is conducted, or where records are required to be kept under the conditions of the permit;

B. Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;

C. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;

D. Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements; and

E. Record any inspection by use of written, electronic, magnetic and photographic media.

X. PERMIT REVISION PURSUANT TO FEDERAL HAZARDOUS AIR POLLUTANT STANDARD [PCC 17.12.160.D.3]

If this source becomes subject to a standard promulgated by the Administrator pursuant to Section 112(d) of the Clean Air Act (Hazardous Air Pollutants), then the Permittee shall, within twelve months of the date on which the standard is promulgated, submit an application for a permit revision demonstrating how the source will comply with the standard.

XI. EXCESS EMISSIONS, PERMIT DEVIATIONS, AND EMERGENCY REPORTING

[PCC 17.12.040]

A. Excess Emissions Reporting [PCC 17.12.040]

1. Excess emissions shall be reported as follows:

   a. The Permittee shall report to the Control Officer any emissions in excess of the limits established by this permit. The report shall be in 2 parts as specified below:

      i. Notification by telephone or facsimile within 24 hours of the time the Permittee first learned of the occurrence of excess emissions that includes all available information from PCC 17.12.040.B. The number to call to report excess emissions is **520-724-7400.** The facsimile number to report excess emissions is **520-838-7432.**

      ii. Detailed written notification by submission of an excess emissions report within 72 hours of the notification under XI.A.1.a.i of Part A. Notifications should be sent to:

      PDEQ Air Program 33 N. Stone Avenue, Suite 700, Tucson, Arizona 85701.

   b. The excess emission report shall contain the following information:

      i. The identity of each stack or other emission point where the excess emission occurred;

      ii. The magnitude of the excess emissions expressed in the units of the applicable emission limitation and the operating data and calculations used in determining the magnitude of the excess emissions;

      iii. The time and duration or expected duration of the excess emissions;

      iv. The identity of the equipment from which the excess emissions emanated;

      v. The nature and cause of the emissions;

      vi. The steps taken, if the excess emissions were the result of a malfunction, to remedy the malfunction and the steps taken or planned to prevent the recurrence of the malfunctions; and

      vii. The steps that were or are being taken to limit the excess emissions; If the source's permit contains procedures governing source operation during periods of startup or malfunction and the excess emissions resulted from startup or malfunction, a list of the steps taken to comply with the permit procedures.

2. In the case of continuous or recurring excess emissions, the notification requirements of this Section shall be satisfied if the source provides the required notification after excess emissions are first detected and includes in the notification an estimate of the time the excess emissions will continue. Excess emissions occurring after the estimated time period or changes in the nature of the emissions as originally reported shall require additional notification pursuant to XI.A.1.a and b of Part A.

B. Permit Deviations Reporting [PCC 17.12.180.A.5.b]

The Permittee shall promptly report deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. Notice in accordance with PCC 17.12.180.E.3.d shall be considered prompt for purposes of this permit.

C. Emergency Provision [PCC 17.12.180.E]

1. An ″Emergency″ means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, that require immediate corrective action to restore normal operation and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emission attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.

2. An emergency constitutes an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the conditions of PCC 17.12.180.E.3 are met.

3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

   a. An emergency occurred and that the Permittee can identify the cause or causes of the emergency;

   b. At the time of the emergency, the permitted facility was being properly operated;

   c. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and

   d. The Permittee submitted notice of the emergency to the Control Officer by certified mail, hand delivery, or facsimile transmission within two working days of the time when emission limitations were exceeded due to the emergency. This notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective action taken.

4. In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.

D. Compliance Schedule [ARS § 49-480.F.3 & 5]

For any excess emission or permit deviation that cannot be corrected within 72 hours, the Permittee is required to submit a compliance schedule to the Control Officer within 21 days of such occurrence. The compliance schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with the permit terms or conditions that have been violated.

E. Affirmative Defenses for Excess Emissions Due to Malfunctions, Startup, and Shutdown.

[PCC 17.12.035]

1. Applicability

This rule establishes affirmative defenses for certain emissions in excess of an emission standard or limitation and applies to all emission standards or limitations except for standards or limitations:

a. Promulgated pursuant to Sections 111 or 112 of the Clean Air Act,

b. Promulgated pursuant to Titles IV or VI of the Clean Air Act,

c. Contained in any Prevention of Significant Deterioration (PSD) or New Source Review (NSR) permit issued by the U.S. E.P.A., or

d. Included in a permit to meet the requirements of PCC 17.16.590.A.5.

2. Affirmative Defense for Malfunctions

Emissions in excess of an applicable emission limitation due to malfunction shall constitute a violation. The Permittee of a source with emissions in excess of an applicable emission limitation due to malfunction has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the owner or operator of the source has complied with the reporting requirements of XIII.B of this Part and has demonstrated all of the following:

a. The excess emissions resulted from a sudden and unavoidable breakdown of process equipment or air pollution control equipment beyond the reasonable control of the operator;

b. The air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;

c. If repairs were required, the repairs were made in an expeditious fashion when the applicable emission limitations were being exceeded. Off-shift labor and overtime were utilized where practicable to ensure that the repairs were made as expeditiously as possible. If off-shift labor and overtime were not utilized, the owner or operator satisfactorily demonstrated that the measures were impracticable;

d. The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;

e. All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;

f. The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance;

g. During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in PCC Chapter 17.08 that could be attributed to the emitting source;

h. The excess emissions did not stem from any activity or event that could have been foreseen and avoided, or planned, and could not have been avoided by better operations and maintenance practices;

i. All emissions monitoring systems were kept in operation if at all practicable; and

j. The Permittee’s actions in response to the excess emissions were documented by contemporaneous records.

3. Affirmative Defense for Startup and Shutdown

   a. Except as provided in XI.E.3.b of Part A, and unless otherwise provided for in the applicable requirement, emissions in excess of an applicable emission limitation due to startup and shutdown shall constitute a violation. The Permittee of a source with emissions in excess of an applicable emission limitation due to startup and shutdown has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the owner or operator of the source has complied with the reporting requirements of XIII.B of Part A and has demonstrated all of the following:

      i. The excess emissions could not have been prevented through careful and prudent planning and design;

      ii. If the excess emissions were the result of a bypass of control equipment, the bypass was unavoidable to prevent loss of life, personal injury, or severe damage to air pollution control equipment, production equipment, or other property;

      iii. The source's air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;

      iv. The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;

      v. All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;

      vi. During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in PCC Chapter 17.08 that could be attributed to the emitting source;

      vii. All emissions monitoring systems were kept in operation if at all practicable; and

      viii. The Permittee's actions in response to the excess emissions were documented by contemporaneous records.

   b. If excess emissions occur due to a malfunction during routine startup and shutdown, then those instances shall be treated as other malfunctions subject to XI.E.2 of Part A.

4. Affirmative Defense for Malfunctions during Scheduled Maintenance

   If excess emissions occur due to a malfunction during scheduled maintenance, then those instances will be treated as other malfunctions subject to XI.E.2 of Part A.

5. Demonstration of Reasonable and Practicable Measures

   For an affirmative defense under XI.E.2 or 3 of Part A, the Permittee of the source shall demonstrate, through submission of the data and information required by XI.E.1 – 5 and XIII.B of Part A, that all reasonable and practicable measures within the owner or operator's control were implemented to prevent the occurrence of the excess emissions.

XII. RECORDKEEPING REQUIREMENTS [PCC 17.12.180.A.4]

A. The Permittee shall keep records of all required monitoring information including recordkeeping requirements established pursuant to PCC 17.12.190, where applicable, for the following:

1. The date, place as defined in the permit, and time of sampling or measurements;

2. The date(s) analyses were performed;

3. The name of the company or entity that performed the analyses;

4. A description of the analytical techniques or methods used;

5. The results of such analyses; and

6. The operating conditions as existing at the time of sampling or measurement.

B. The Permittee shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

C. All required records shall be maintained using a normal business electronic recordkeeping format or printed records including handwritten forms or logbooks utilizing indelible ink.

XIII. REPORTING REQUIREMENTS [PCC 17.12.180.A.5]

The Permittee shall comply with all of the reporting requirements of this permit. These include all of the following:

A. Compliance certifications pursuant to VII of Part A.

B. Excess emissions; permit deviations, and emergency reports in accordance with XI of Part A.

C. Performance test results in accordance with XVII.F of Part A.

D. Reporting requirements are listed in Part B of this permit.

XIV. DUTY TO PROVIDE INFORMATION

[PCC 17.12.180.A.8.e, PCC 17.12.160.G, and PCC 17.12.160.H]

A. The Permittee shall furnish to the Control Officer, within a reasonable time, any information that the Control Officer may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the Control Officer copies of records required to be kept by the permit. For information claimed to be confidential, the Permittee, for Class I sources, shall furnish an additional copy of such records directly to the Administrator along with a claim of confidentiality.

B. If the Permittee has failed to submit any relevant facts or if the Permittee has submitted incorrect information in the permit application, the Permittee shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. In addition, an applicant shall provide additional information as necessary to address any requirements that become applicable to the source after the date it filed a complete application but prior to release of a proposed permit.

XV. PERMIT AMENDMENT OR REVISION [PCC 17.12.245, PCC 17.12.255 & PCC 17.12.260]

The Permittee shall apply for a permit amendment or revision for changes to the facilities which do not qualify for a facility change without revision under XVI of Part A, as follows:

A. Administrative Permit Amendment (PCC 17.12.245);

B. Minor Permit Revision (PCC 17.12.255);

C. Significant Permit Revision (PCC 17.12.260).

The applicability and requirements for such action are defined in the above referenced regulations.

XVI. FACILITY CHANGES ALLOWED WITHOUT PERMIT REVISIONS [PCC 17.12.230]

A. A facility with a Class I permit may make changes without a permit revision if all of the following apply:

1. The changes are not modifications under any provision of Title I of the Clean Air Act (Air Pollution Prevention and Control) or under modifications as defined in A.R.S. 49-401.01;

2. The changes do not exceed the emissions allowable under the permit whether expressed therein as a rate of emissions or in terms of total emissions;

3. The changes do not violate any applicable requirements or trigger any additional applicable requirements;

4. The changes satisfy all requirements for a minor permit revision under PCC 17.12.255; and

5. The changes do not contravene federally enforceable permit terms and conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements.

B. The substitution of an item of process or pollution control equipment for an identical or substantially similar item of process or pollution control equipment shall qualify as a change that does not require a permit revision, if the substitution meets all of the requirements of XVI.A, D and E of Part A.

C. Except for sources with authority to operate under general permits, permitted sources may trade increases and decreases in emissions within the permitted facility, as established in the permit under PCC 17.12.180.A.12 if an applicable implementation plan provides for the emissions trades, without applying for a permit revision and based on the seven working days' notice prescribed in XVI.D of Part A. This provision is available if the permit does not provide for the emissions trading as a minor permit revision.

D. For each change under XVI.A through C of Part A, a written notice, by certified mail or hand delivery, shall be received by the Control Officer and the Administrator a minimum of seven (7)

working days in advance of the change. Notifications of changes associated with emergency conditions, such as malfunctions necessitating the replacement of equipment, may be provided less than 7 working days in advance of the change but must be provided as far in advance of the change, or if advance notification is not practicable as soon after the change as possible.

E. Each notification shall include:

1. When the proposed change will occur;

2. A description of the change;

3. Any change in emissions of regulated air pollutants;

4. The pollutants emitted subject to the emissions trade, if any;

5. The provisions in the implementation plan that provide for the emissions trade with which the source will comply and any other information as may be required by the provisions in the implementation plan authorizing the trade;

6. If the emissions trading provisions of the implementation plan are invoked, then the permit requirements with which the source will comply; and

7. Any permit term or condition that is no longer applicable as a result of the change.

F. The permit shield described in PCC 17.12.310 shall not apply to any change made under XVI.A through C of this Part. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the implementation plan authorizing the emissions trade.

G. Except as otherwise provided for in the permit, making a change from one alternative operating scenario to another as provided under PCC 17.12.180.A.11 shall not require any prior notice under XVI Part A.

H. Notwithstanding any other part of this Section, the Control Officer may require a permit to be revised for any change that when considered together with any other changes submitted by the same source under the provisions of PCC 17.12.230 over the term of the permit, do not satisfy XVI.A of this Part.

XVII. TESTING REQUIREMENTS [PCC 17.12.050]

A. Operational Conditions During Testing

Performance tests shall be conducted while the unit is operating at full load under representative operational conditions unless other conditions are required by the applicable test method or in this permit. With prior written approval from the Control Officer, testing may be performed at a lower rate. Operations during start-up, shutdown, and malfunction (as defined in PCC 17.04.340.A) shall not constitute representative operational conditions unless otherwise specified in the applicable requirement.

B. Tests shall be conducted and data reduced in accordance with the test methods and procedures contained in the Arizona Testing Manual, 40 CFR 52; Appendices D and E, 40 CFR 60; Appendices A through F; and 40 CFR 61, Appendices B and C unless modified by the Control Officer pursuant to PCC 17.12.050.B.

C. Test Plan

At least 14 calendar days prior to performing a test, the Permittee shall submit a test plan to the Control Officer, in accordance with PCC 17.12.050.D and the Arizona Testing Manual.

D. Stack Sampling Facilities

The Permittee shall provide or cause to be provided, performance testing facilities as follows:

1. Sampling ports adequate for test methods applicable to the facility;

2. Safe sampling platform(s);

3. Safe access to sampling platform(s); and,

4. Utilities for sampling and testing equipment.

E. Interpretation of Final Results

Each performance test shall consist of three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard, the arithmetic means of results of the three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the three runs is required to be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the Permittee's control, compliance may, upon the Control Officer's approval, be determined using the arithmetic mean of the results of the other two runs. If the Control Officer or the Control Officer's designee is present, tests may only be stopped with the Control Officer's or such designee's approval. If the Control Officer or the Control Officer's designee is not present, tests may only be stopped for good cause. Good cause includes: forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the Permittee's control. Termination of any test without good cause after the first run is commenced shall constitute a failure of the test. Supporting documentation, which demonstrates good cause, must be submitted.

F. Report of Final Test Results

A written report of the results of all performance tests shall be submitted to the control officer within 30 days after the test is performed. The report shall be submitted in accordance with the Arizona Testing Manual.

XVIII. PROPERTY RIGHTS

[PCC 17.12.180.A.8.d]

This permit does not convey any property rights of any sort, or any exclusive privilege to the Permittee.

XIX. SEVERABILITY CLAUSE [PCC 17.12.180.A.7]

The provisions of this permit are severable. In the event of a challenge to any portion of this permit that results in any provision of this permit being held invalid, the remainder of this permit shall not be affected thereby.

XX. ACCIDENT PREVENTION REQUIREMENTS UNDER THE CLEAN AIR ACT (CAA Section 112(r))

Should this stationary source, as defined in 40 CFR Part 68.3, become subject to the accidental release prevention regulations in Part 68, then the Permittee shall submit a risk management plan (RMP) by the date specified in Section 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 CFR Part 70 and Part B of this permit.

XXI. ASBESTOS REQUIREMENTS (Demolition/ Renovation)

Should this stationary source, pursuant to 40 CFR 61, Subpart M become subject to the National Emission Standards for Hazardous Air Pollutants - Asbestos for asbestos regulations when conducting any renovation or demolition at this premises, then the Permittee shall submit proper notification as described in 40 CFR Subpart M and shall comply with all other applicable requirements of subpart M. The Permittee shall keep a record of all relevant paperwork on file. [40 CFR 61, Subpart M]

XXII. STRATOSPHERIC OZONE DEPLETING SUBSTANCES

The Permittee shall not use, sell, or offer for sale any fluid as a substitute material for use in any motor vehicle, residential, commercial, or industrial air conditioning system, refrigerator or freezer unit, or other cooling or heating device designed to use a chlorofluorocarbon (CFC) or hydrochlorofluorocarbon (HCFC) compound as a working fluid, unless such fluid has been approved for sale and such use by the Administrator. The Permittee shall keep a record of all paperwork relevant to the applicable requirements of 40 CFR 82, Subpart F onsite. [40 CFR 82 & PCC 17.16.710]

PART B
SPECIFIC PROVISIONS

[References are to Title 17 of the Pima County Code unless otherwise noted]

I. APPLICABILITY

[40 CFR 63.5785(a) & PCC 17.12.140.B.1.a]

The Inter-Fab, Inc. facility is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) also known as Maximum Achievable Control Technology (MACT) standard pursuant to 40 CFR 63 Subpart WWWW – "Reinforced Plastic Composites Production".

The NESHAP rule applies to new or existing affected sources at reinforced composites production facilities. In addition, the facility is also required to meet the standards in Title 17 of the Pima County Code (PCC), 17.16.400, "Organic solvents and other organic materials", PCC 17.16.430, "Standards of performance for unclassified sources" and provisions of the Pima County State Implementation Plan (SIP). A comprehensive list of applicable requirements is identified in Attachment 1 of this permit.

The effected sources consist of all parts of the facility engaged in the following operations:

- Open molding.
- Closed molding.
- Mixing.
- Cleaning of equipment used in plastics composites manufacturer.
- HAP containing materials storage.
- Repair on parts the facility also manufactures.

The following operations are specifically excluded any requirements of the NESHAP rule however operations are subject to the PCC and the SIP. [40 CFR 63.5785(a) & (b)]

- Application of mold sealing and release agents.
- Mold stripping and cleaning.
- Repair on parts that the facility did not manufacture, including non-routine manufacture of parts.
- Pre-peg materials (defined as reinforced fabric received pre-coated with resin which is usually cured with the addition of heat.
- Non-gel coat surface coatings.
- Repair or production materials that do not contain resin or gel coat.

II. EMISSION LIMITS & STANDARDS

[PCC 17.12.180]

[Locally Enforceable Condition]

A. Reinforced Plastic Composites Production

1. The Permittee shall not use more polyester resin and vinyl esters or gel-coat products, calculated as a 12-month rolling total, than listed in the following table: [PCC 17.12.190]

[Material Permit Condition]

Product Type	Maximum Pounds of Product per 12-Month Period
Polyester Resins and Vinyl Esters	1,892,222
Gel Coats	361,771

2. The Permittee shall only use non-atomized spray to apply the polyester resin and vinyl esters. [PCC 17.12.190]
[Material Permit Condition]

3. The Permittee shall not use any polyester resin or vinyl ester product containing more than 40.0 percent (40.0%) by weight of styrene. Additionally, no resin consumed on-site shall contain HAPs in excess of the values in the following table: [PCC 17.12.190 & 40 CFR 63.5810(d)(1) Table 7, #2]
[Material Permit Conditions]

Operation	Resin Application Method	Maximum Organic HAP content (% by Weight)
All Operations	Open Molding Application Methods	35.0%
All Operations	Closed Molding Application Methods	40.0%

4. The Permittee shall not use any gel coat products containing more than 37.02 percent (37.02%) by weight of styrene (CAS Number 100425) nor more than 6.1 percent (6.1%) by weight of methyl methacrylate (CAS Number 80626). Additionally, no gel coat consumed on-site shall contain HAPs in excess of 43.5 percent (43.5%) maximum organic HAP content by weight. [PCC 17.12.190 & 40 CFR 63.5810(d) Table 3]
[Material Permit Conditions]

5. Of the 361,771 pounds of gelcoats allowed per 12-month period, no more than 56530 pounds may be applied in the diving board open molding application. [PCC 17.12.190]
[Material Permit Condition]

B. Work Practice Standards **[Material Permit Conditions]**

1. For cleaning operations, the Permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP-containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin. [40 CFR 63 Subpart WWWW, Table 4, #2]

2. For HAP-containing materials storage operations, the Permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety [40 CFR 63 Subpart WWWW, Table 4, #3]

3. The Permittee shall use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation. The Permittee shall close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding material or opening the cover for safety. [40 CFR 63 Subpart WWWW, Table 4, #6 & #7]

4. The Permittee shall not apply any gel coat products using mechanized spray equipment except as allowed in II.A.5 of this Part B. [PCC 17.12.190]

5. The Permittee shall not conduct any filament winding, centrifugal casting, continuous lamination/casting, or pultrusion operations (as defined in Subpart WWWW). [PCC 17.12.190]
[Material Permit Condition]

6. Notwithstanding II.B.3 of this Part, containers of 5 gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e. they are actually being used to apply resin). [40 CFR 63 Subpart WWWW, Table 4, Footnote]

C. Adhesives [Material Permit Conditions]

1. The Permittee shall not use greater than 6,000 gallons of any adhesive, calculated as a 12-month rolling total. For the purposes of this permit, adhesive is defined as an adhesive which contains greater than 60 percent methyl methacrylate monomer and less than 1 percent isopropanol, by weight. [PCC 17.12.190]

2. The Permittee shall not use greater than 600 gallons of any activator, calculated as a 12-month rolling total. For the purposes of this permit, activator is defined as a solution which contains dibutyl phthalate in a quantity of at least 10 percent and no greater than 30 percent, by weight. [PCC 17.12.190]

D. Surface Coating Operations

1. Material Use Limitation [PCC 17.12.190]
[Material Permit Conditions and Federally Enforceable Conditions]

   a. The Permittee shall not use greater than 2,400 gallons of paint products (excluding powder coatings and cleanup solvents), calculated as a 12-month rolling total.

   b. The Permittee shall not allow the combined VOC and HAP content of any painting product, except cleanup solvents, to exceed 6.0 pounds per gallon. [PCC 17.12.190]

2. Operational Limitation

   The Permittee shall not conduct any spray paint operation without minimizing organic solvent emissions. Such operations other than architectural coating and spot painting shall be conducted in an enclosed area equipped with controls containing no less than 96 percent of the overspray. [PCC 17.16.400.C.1]
[Material Permit Condition and Locally Enforceable Condition]

3. Volatile Organic Compound (VOC) Limitation

   The Permittee shall not transport or store VOCs without taking necessary and feasible measures to control evaporation, leakage and other discharge into the atmosphere. [PCC 17.16.400.A]

4. The Permittee shall not either: [PCC 17.16.400.C.2]
[Locally Enforceable Conditions]

   a. Employ, apply, evaporate or dry any architectural coating containing photochemically reactive solvents for industrial or commercial purposes; or,

   b. Thin or dilute any architectural coating with a photochemically reactive solvent.

   c. For purposes of II.D.4.a of this Part, a photochemically reactive solvent shall be any solvent with an aggregate of more than 20 percent of its total volume composed of the chemical compounds classified in subparagraphs a through c of this paragraph or which exceeds any of the following percentage composition limitations, referred to the total volume of solvent:

i. A combination of the following types of compounds having an olefinic or cyclo-olefinic type of unsaturation -- hydrocarbons, alcohols, aldehydes, esters, ethers, or ketones: five percent.

ii. A combination of aromatic compounds with eight or more carbon atoms to the molecule, except ethylbenzene: eight percent.

iii. A combination of ethylbenzene, ketones having branched hydrocarbon structures, trichloroethylene or toluene: 20 percent.

d. Whenever any organic solvent or any constituent of an organic solvent may be classified from its chemical structure into more than one of the groups of organic compounds described in II.D.4.a, b, or c of this Part B it shall be considered to be a member of the group having the least allowable percent of the total volume of solvents.

E. All Operations

1. The Permittee shall keep containers that store VOC and/or HAP-containing materials closed or covered except during the addition or removal of materials. [PCC 17.16.400]

[Material Permit Condition]

2. The Permittee shall not emit gaseous or odorous materials from equipment, operations, or premises under his control in such quantities as to cause air pollution. [PCC 17.16.030 & SIP 344]

[Federally Enforceable Condition]

3. The Permittee shall not cause or permit the effluent from a single emission point, multiple emission point, or fugitive emissions source to have an average optical density greater than 20%. [PCC 17.16.040 & SIP 321]

[Locally Enforceable Condition]

4. The Permittee shall not allow diffusion of visible emissions beyond the property boundary line within which the emissions become airborne without taking reasonably necessary precautions to control generation of airborne particulate matter. [PCC 17.16.050.D.1&2 & SIP 343]

[Federally Enforceable Condition]

5. Materials including solvents or other volatile compounds, paints, acids, alkalies, pesticides, fertilizers and manure shall be processed, stored, used and transported in such a manner and by such means that they will not evaporate, leak, escape or be otherwise discharged into the ambient air so as to cause or contribute to air pollution. Where means are available to reduce effectively the contribution to air pollution from evaporation, leakage or discharge, the installation and use of such control methods, devices, or equipment shall be mandatory. [PCC 17.16.430.F]

[Locally Enforceable Condition]

6. Where a stack, vent or other outlet is at such a level that fumes, gas mist, odor, smoke, vapor or any combination thereof constituting air pollution are discharged to adjoining property, the control officer may require the installation of abatement equipment or the alteration of such stack, vent or other outlet by the owner or operator thereof to a degree that will adequately dilute, reduce or eliminate the discharge of air pollution to adjoining property. [PCC 17.16.430.G]

[Locally Enforceable Condition]

III. MONITORING AND RECORDING REQUIREMENTS

[PCC 17.12.180.A.3 and A.4]

[Locally Enforceable Condition]

A. Reinforced Plastic Composites Production

1. The Permittee shall demonstrate compliance with the product usage requirement in II.A.1 and II.A.5 of this Part by monitoring and recording (within 10 days of the end of the month) the following:

   a. The inventory/usage of resins and gel coats used in each operation type each month.

   b. Yearly totals of resin/gel coat used in each operation type for the most recent 12-consecutive month period. These shall be kept by adding the totals from III.A.1.a of this Part to the record of the previous 11 consecutive months.

2. The Permittee shall be considered in compliance with the spray application method in II.A.2 of this Part by actual inspection of the equipment showing that only non-atomized guns are used.

3. In order to demonstrate compliance with the organic HAP limitations for resins and gel coats in II.A.3 & 4 of this part, the Permittee shall maintain onsite information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS). The Permittee shall use the following procedures, as applicable:

   [40 CFR 63.5797]

   a. Include in the organic HAP total of each product all organic HAPs that are present at 0.1 percent by mass or more for Occupational Safety and Health Administration-defined carcinogens, as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other organic HAP compounds. [40 CFR 63.5797(a)]

   b. If the organic HAP content is provided by the material supplier or manufacturer as a range, you must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content, such as an analysis of the material by EPA Method 311 of appendix A to 40 CFR part 63, exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then you must use the measured organic HAP content to demonstrate compliance. [40 CFR 63.5797(b)]

   c. If the organic HAP content is provided as a single value, you may use that value to determine compliance. If a separate measurement of the total organic HAP content is made and is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then you still may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then you must use the measured organic HAP content to demonstrate compliance.

   [40 CFR 63.5797(c)]

   d. The Product information sheet must contain sufficient information to allow the Permittee to determine the weight or density of the product and the amount (in weight percent of total product) and chemical abstract service (CAS) number of each volatile organic compound and hazardous air pollutant contained in the product.

   [PCC 17.12.190]

B. Work Practice Standards

At least once during each calendar month, the Permittee shall conduct an on-site inspection. The inspection shall be conducted while resins or gel coats are being applied and shall address the following items:

1. That the cleanup solvent used contains no VOC or HAP constituents (except as provided in II.B.1 of this Part).

2. That all storage vessels containing VOC or HAP are completely covered (except as provided in II.B.2 of this Part).

3. That covers on resin and gel coat mixers have no visible gaps (except as provided in II.B.3 of this Part).

4. That odors and visible emissions are not observed outside the production buildings.

5. That architectural coatings used on site are not photo-chemically reactive.

6. Monitoring records of this monthly inspection shall include, at a minimum, the date of the inspection, the name and signature of the person conducting the inspection, the inspection results of each item checked (specifically items III.B.1.through 5) with discrepancies noted, and any corrective action taken.

C. Adhesives

The Permittee shall demonstrate compliance with the product usage requirement in II.C.1 of this Part by recording (within 10 days of the end of the month) the following:

1. The inventory/usage of Adhesives used each month.

2. Yearly totals of Adhesives used for the most recent 12-consecutive month period. These shall be kept by adding the totals from III.C.1.a of this Part to the record of the previous 11 consecutive months.

D. Surface Coating Operations

The Permittee shall demonstrate compliance with the product usage requirement in II.D.1 of this Part by recording (within 10 days of the end of the month) the following:

1. The amount (gallons), the VOC content (percent by weight), and the HAP content (percent by weight) of paint products (excluding powder coatings and cleanup solvents) used during the previous calendar month.

2. Yearly totals of paint products used for the most recent 12-consecutive month period. These shall be kept by adding the totals from III.D.1 of this Part to the record of the previous 11 consecutive months.

E. All Operations

1. The Permittee shall maintain on site a manufacturer's product information sheet (Material Safety Data Sheet or its equivalent) for each product used in the Permittee's process.

    a. The product information sheet must contain sufficient information to allow the Permittee to determine the weight or density of the product and the amount (in weight percent of total product) and chemical abstract service (CAS) number of each volatile organic compound and hazardous air pollutant contained in the product.

    b. Where the product information sheet contains content information of a product constituent in terms of a range of values (e.g., 40% to 60 %), the Permittee shall assume the content of the constituent to be the highest value of the range.

2. Using the information recorded in III.A through D of this Part, within ten working days of the beginning of each new calendar month, the Permittee shall calculate and record each of the following (in tons) for the previous month:

    a. Total VOC and HAP emissions from each of the polyester resins and vinyl esters application operations:

        i. Manually applied (hand layup).

        ii. Mechanized atomized application.

    b. Total VOC and HAP emissions from gel coat application operations.

    c. Total VOC and HAP emissions from painting operations (excluding powder coatings and cleanup solvents).

    d. Total VOC and HAP emissions from adhesives and activators used containing those constituents.

    e. The total VOC and total HAP emissions from all operations in the previous 12-consecutive months. Rolling 12-month totals shall be calculated by taking the twelve most recent completed calendar months and adding the totals for each of those months. For the purposes of these calculations, the Permittee may use the following procedures:

        i. Providing the Permittee is in compliance with II.A.1, 2, & II.B.4 of this Part, the Permittee may assume that all polyester resins and vinyl esters used during the period had a styrene content of 35% by weight. In that case, the Permittee may use the following emission factors:

            (A) For manual application (hand layup open-molding operations): 94 pounds of VOC and HAP emitted per ton of resin or ester processed.

            (B) For mechanized non-atomized application: 77 pounds of VOC and HAP emitted per ton of resin or ester processed.

        ii. Providing the Permittee is in compliance with II.A.1, 4, & II.B.4 of this Part, the Permittee may assume that all gel coats used during the period had a styrene content of 35% by weight and 5% by weight of methyl methacrylate. In that case, the Permittee may use the following emission factor: 336 pounds of VOC and HAP emitted per ton of gel coat processed for Infusion processes and 214 pounds of VOC and HAP emitted per ton of gel coat processed for open molding processes.

iii. Providing the Permittee is in compliance with II.D.1 of this Part, the Permittee may assume that all paint products applied had a combined VOC and HAP content of 6 pounds per gallon.

iv. Providing the Permittee is in compliance with II.C.1 & 2 of this Part, the Permittee may assume that all adhesives and activators applied had a combined VOC and HAP content of 0.44 pounds per gallon of adhesive and 3.2 pounds per gallon of activator.

v. The Permittee's use of other emission factors is contingent upon approval, in advance of their use, by the EPA Administrator and the Control Officer.

3. At least once during each calendar month, the Permittee shall conduct and record the results of an on site inspection. The inspection shall be conducted while resins or gel coats are being applied and shall address the following items:

a. That the solvent used in any fiberglass cleanup operation contains no VOC or HAP constituents (except as provided in II.B.1 of this Part).

b. That all resins used do not have a styrene or HAP content greater than the values allowed by II.A.3 of Part B.

c. That all gel coats used do not have a styrene, methyl methacrylate, or HAP content greater than the values allowed by II.A.4 of This Part.

d. That all paint products used contain no more than 6 pounds per gallon of VOC.

e. That all activators used contain no more than 20 percent dibutyl phthalate by weight.

f. That all storage vessels containing VOC or HAP are completely covered except as provided in II.A.5.b of this Part.

g. That covers on resin and gel coat mixers have no visible gaps except as provided in II.A.5.c of this Part.

h. That odors and visible emissions are not observed outside the production buildings. If visible emissions are observed, then the Permittee shall make arrangements to have an EPA Method 9 opacity test conducted by an individual currently certified in Method 9 procedures.

i. That architectural coatings used on site are not photochemically reactive.

j. That spray painting and coating operations are conducted within an enclosure.

k. Records of monthly inspections shall include, at minimum, the date of the inspection, the name and signature of the person conducting the inspection, the inspection results of each item checked (i.e., items III.B.4.a through j this Part) with discrepancies noted, results of any opacity tests conducted, and any corrective action taken.

4. The Permittee shall maintain a record of the particulate removal efficiencies of all paint booth dry particulate filters used.

IV. REPORTING REQUIREMENTS

[PCC 17.12.180.A.5 & PCC 17.12.210]
[Locally Enforceable Conditions]

A. Semiannual Summary Reports of Required Monitoring.

1. The Permittee shall submit semiannual summary reports of the following monitoring and/or recordkeeping requirements:

   a. The most recent complete 12-month rolling totals (in tons) of total VOC and total HAP emissions resulting from the use of polyester resins and vinyl esters in each of the following categories:

      i. open molding application methods

      ii. infusion process (closed molding applications).

   b. The most recent complete 12-month rolling totals (in tons) of total VOC and total HAP emissions resulting from the use of gel coat applications.

   c. The most recent complete 12-month rolling totals (in tons) of total VOC and total HAP emissions resulting from the use of VOC and HAP containing cleanup solvents.

   d. The most recent complete 12-month rolling totals (in tons) of total VOC and total HAP emissions resulting from the use of adhesives and activators.

   e. The most recent complete 12-month rolling totals (in tons) of total VOC and total HAP emissions resulting from all paint products applied.

   f. A summary of the results of the monthly inspections conducted since the last semiannual report.

2. Summary reports shall be due by January 31st (covering the period July 1st through December 31st) and July 31st (covering the period January 1st through June 30th) of each year. The first summary report due after permit issuance may not cover a 6-month period. All instances of excess emissions and deviations from permit requirements as defined in XI of Part A, shall be clearly identified in such reports.

B. Compliance Certification Reporting:

The Permittee shall submit semiannual compliance certifications to the Control Officer. The Compliance Certification Reports are due by January 31st and July 31st of each year and shall cover the same periods as the semiannual summary reports (IV.A.2 of this Part). The first report due after permit issuance may not cover a 6-month period. (See VII of Part A, for detailed information on this report).

[PCC 17.12.210.A.2]
[Locally Enforceable Condition]

1. The compliance certification shall include the following: **[Federally Enforceable Conditions]**

   a. The Permittee shall include a statement in each compliance report that all resins and gel coats still meet the organic HAP limits in II.A.3 & 4 of this Part. If after any compliance report, the Permittee changes to a higher organic HAP resin or gel coat, or increases the resin or gel coat organic HAP content, or changes to a higher emitting resin or gel coat application method the Permittee shall demonstrate compliance with II.A.3 & 4, begin collecting resin and gel coat use records for a 12-month rolling average (in accordance with 40 CFR 63.5810.(a) through (c), if necessary), and/or submit the appropriate revision pursuant to Title 17 Chapter 12 of the Pima County Code. [40 CFR 63.5895(d) & 40 CFR 5900(a)(2)]

b. A statement that there were no deviations during that reporting period if there were no deviations from any emission limitations (emission limit and operating limit opacity limit, and visible emission limit) that apply and there were no deviations from the requirements for work practice standards in II.B of this Part. [40 CFR 63.5910(a)]

c. If a deviation from any emission limit, operating limit, or work practice standard has occurred (including period of startup, shutdown, and malfunction) during the reporting period, the Permittee shall submit the following information: [40 CFR 63.5910(a)]

i. The total operating time of each affected source during the reporting period.

ii. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

d. The Permittee shall report if the source has met or exceeded the 90 tpy organic HAP emissions threshold. The Permittee shall include with this report any request for an exemption under 40 CFR 63.5805(e) as follows: [40 CFR 63.5910(f)]

i. The Permittee may at the same time request a one-time exemption from the requirements of 40 CFR 63.5805(b) or (d) in the compliance report if the Permittee can demonstrate all of the following: [40 CFR 63.5805(e)]

(A) The exceedance of the threshold was due to circumstances that will not be repeated.

(B) The average annual organic HAP emissions from the potentially affected operations for the last 3 years were below 100 tpy.

(C) Projected organic HAP emissions for the next calendar year are below 100 tpy, based on projected resin and gel coat use and the HAP emission factors calculated according to the procedures in this permit.

ii. If the source had received an exemption under 40 CFR 63.5805(e) and subsequently exceeds the 100 tpy organic HAP emissions threshold, the Permittee shall report this exceedance as required in 40 CFR 63.5805(f).

2. The following administrative information shall be included in each compliance certification: [40 CFR 63.5910(c)]

a. The company name and address.

b. A statement by a responsible official with that official's name, title, and signature, signifying the truth, accuracy, and completeness of the content of the report.

C. Emissions Inventory Reporting:

The Permittee shall complete and submit an annual emissions inventory questionnaire when requested by the Control Officer. (See VI of Part A, for additional information on this report). [PCC 17.12.320]

[Locally Enforceable Condition]

V. TESTING REQUIREMENTS

[PCC 17.12.180.A.3.a & PCC 17.20.010]

[Locally Enforceable Condition]

For purposes of demonstrating compliance, these test methods shall be used, provided that for the purpose of establishing whether or not the facility has violated or is in violation of any provision of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable federal requirements if the appropriate performance or compliance procedures or methods had been performed.

A. EPA Test Reference Method 9 shall be used to monitor compliance with the opacity standard in II.E.3 of this Part.

B. If the Control Officer has reasonable cause to believe that a manufacturer's product information sheet referenced in III.A.4 of this Part is deficient, the Control Officer may require the Permittee to conduct testing to confirm the validity of the information contained within the sheet in question.

C. Testing for odors at the facility to determine compliance with the standard in II.E.2 of this Part, is not normally necessary because the use of good modern practices prevents the emission of odors beyond the property boundary. The Control Officer may require the Permittee to test for odor emissions if the Control Officer has reasonable cause to believe a violation of a standard has been committed.

[PCC 17.20.010]

PART C
APPLICABLE REGULATIONS

Requirements specifically identified as applicable:

Compliance with the terms contained in this permit shall be deemed compliance with the following *federally applicable requirements* in effect on the date of permit issuance:

Title 40 of the Code of Federal Regulations Part 63:

Subpart WWWW	National Emission Standards for Hazardous Pollutants: Reinforced Plastics Composites Production.

State Implementation Plan, Pima County:

Rule 321	Emissions-Discharge: Opacity Limiting Standards and Applicability
Rule 343	Visibility Limiting Standard
Rule 344	Odor limiting Standard

Compliance with the terms contained in this permit shall be deemed compliance with the following *non-federally applicable requirements* in effect on the date of permit issuance:

Pima County Code (PCC) Title 17, Chapter 17:

17.16.030	Odor Limiting Standards
17.12.035	Affirmative defenses for excess emissions due to malfunctions, startup, and shutdown
17.12.040	Reporting requirements
17.12.050	Performance tests
17.12.080	Permit display or posting
17.12.160	Permit application processing procedures for Class I permit
17.12.180	Permit contents for Class I permits
17.12.190	Permits containing synthetic emission limitations and standards
17.12.220	Compliance plan - Certification
17.12.245	Administrative permit amendments
17.12.255	Minor permit revisions
17.12.260	Significant permit revisions
17.12.270	Permit reopenings - Revocation and reissuance - Termination
17.12.310	Permit shields
17.12.320	Annual emissions inventory questionnaire
17.12.510	Fees related to Class I permit
17.16.030	Odor Limiting Standards
17.16.040	Standards and Applicability (Visible Emissions)
17.16.050	Visibility Limiting Standards
17.16.400	Organic Solvents and Other Organic Materials
17.16.430	Standards of Performance for Unclassified Sources
17.20.010	Source Sampling, Monitoring, and Testing (Section A)

PART D
EQUIPMENT LIST

1. Powder Coating Oven

   Manufacturer; Industrial Process Equipment, Inc.
   Model; Russ Rumsey #1428.
   Manufactured; approx. 1998.
   Maximum Capacity; 800,000 Btu

2. Powder Coating Spray Booth with two 18” stacks.

3. Three Rock Product Spray Booths with 36” stacks.

4. Diving Board Process/ City Pool Slide Area.

5. Pool Slides Process Area.

6. Gel Coat Booth (Alvernon Building).

7. Infusion Area (Closed molding) Alvernon Building.