

**PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR PROGRAM**

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

**AIR QUALITY PERMIT**

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

**ISSUED TO**

**S.R. SMITH, L.L.C.  
TUCSON FACILITY**

**3050 S. ALVERNON WAY  
TUCSON, AZ 85713**

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

THIS PERMIT ISSUED SUBJECT TO THE FOLLOWING: **Terms and Conditions contained in Parts A, B and Attachments 1 through 4.**

PERMIT NUMBER **6229**

PERMIT CLASS **I**

PERMIT ISSUED DATE: **SEPTEMBER 11, 2020**

EXPIRATION DATE: **SEPTEMBER 10, 2025**



SIGNATURE

**Rupesh Patel, Air Program Manager, PDEQ**

TITLE

**TABLE OF CONTENTS**

**Summary** ..... 4

**Part A: General Conditions** ..... 6

1. Permit Expiration and Renewal ..... 6

2. Compliance with Permit Conditions ..... 6

3. Permit Revision, Reopening, Revocation and Reissuance, or Termination for Cause ..... 6

4. Posting of Permit ..... 7

5. Fee Payment ..... 7

6. Annual Emissions Inventory Questionnaire ..... 7

7. Compliance Certification ..... 7

8. Certification of Truth, Accuracy and Completeness ..... 8

9. Inspection and Entry ..... 8

10. Permit Revision Pursuant to Federal Hazardous Air Pollutant Standard ..... 8

11. Excess Emissions, Permit Deviations, And Emergency Reporting ..... 9

12. Recordkeeping Requirements ..... 13

13. Reporting Requirements ..... 13

14. Duty to Provide Information ..... 13

15. Permit Amendment or Revision ..... 14

16. Facility Changes Allowed Without Permit Revisions ..... 14

17. Testing Requirements ..... 15

18. Property Rights ..... 16

19. Severability Clause ..... 17

20. Permit Shield ..... 17

21. Accident Prevention Requirements Under the Clean Air Act (CAA Section 112(r)) ..... 17

22. Requirement to Obtain Activity Permits ..... 17

23. Stratospheric Ozone Depleting Substances ..... 17

    24–25 [Reserved]

**Part B: Specific Conditions** ..... 18

**§ 1: Authority, Classification, and Permit Organization** ..... 18

26 – 30

**§ 2: Applicability** ..... 19

31 – 35

**§ 3: Definitions** ..... 20

**§ 4: Emission Limitations and Standards** ..... 28

36. Voluntary Limitations ..... 28

a. RPC Production ..... 28

b. Adhesives & Activators ..... 28

c. Surface Coating Operations ..... 28

d. Facility-Wide ..... 28

37. RPC Production – Emission Limitations ..... 29

a. Organic HAP Emission Factors ..... 29

b. Organic HAP Emission Limits ..... 29

c. Work Practice Standards ..... 31

38. Surface Coating Operations – Local Standards ..... 32

39.	Facility – Wide Provisions	33
a.	General Control Requirements	33
b.	Operation and Maintenance Requirements	33
c.	Materials Handling Requirements	33
d.	Gaseous or Odorous Materials	34
e.	Opacity	34
f.	Visibility Limiting Standard	34
<b>§ 5:</b>	<b>Monitoring and Recordkeeping Requirements</b>	<b>36</b>
41.	RPC Production	36
42.	RPC Work Practice Standards	36
43.	Adhesives & Activators	37
44.	Surface Coating Operations	37
45.	All Operations - Records	37
<b>§ 6:</b>	<b>Reporting</b>	<b>40</b>
50.	Excess Emissions and Permit Deviations	40
51.	Semiannual Summary Reports of Required Monitoring	40
52.	Compliance Certification	41
<b>§ 7:</b>	<b>Testing</b>	<b>42</b>
<b><u>Attachment 1:</u></b>	<b>Applicable Regulations</b>	<b>43</b>
<b><u>Attachment 2:</u></b>	<b>Equipment List</b>	<b>45</b>
<b><u>Attachment 3:</u></b>	<b>Summary of Monitoring &amp; Recordkeeping Provisions</b>	<b>47</b>

## SUMMARY

### Location Information

This individual air quality permit is issued to S.R. Smith, L.L.C., the Permittee, for their manufacturing facility located at 3050 S. Alvernon Way, Tucson, AZ 85713. The source is located on two parcels identified by Pima County Assessor's as 132-04-120C and 132-04-109C.

The facility manufactures diving boards and pool slides for swimming pools using plastic composites.

The manufacturing process uses fiberglass and thermoset resins and/or gel coats to produce the plastic composites. The primary air toxics emitted from the facility 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 facility maintains a Class I air quality permit as a major source of HAP (styrene) subject to 40 CFR Part 63, Subpart WWWW – NESHAP: Reinforced Plastics Composites Production. The facility has accepted limits as provided in this permit to limit the emissions from the facility to less than 90 tons per year of VOC and 90 tons per year of HAPs on a 12-consecutive month rolling total basis.

The facility also operates a wood shop and production area dust collection system as part of the manufacturing operations.

The company operates primarily Monday through Friday, 8 hours per day (2080 hrs), with a second shift being utilized in the summer months (May-August). Operating hours in summer months are usually Monday through Saturday, 10 hr days (1080 additional hours). ~ 35% capacity vs 8760 hours per year.

Regulated pollutants emitted from the facility includes Particulate Matter, VOC, and HAP.

The following emission rates are for reference purposes only and are used to establish baseline emissions for the source. They are based on recent usage and operations data. They are not intended to be enforceable emission limits subject to direct measurement unless specified in Part B of this permit. The estimates are a result of information provided in the renewal application submitted August 16, 2019 and emission factors presented in the Technical Support Document associated with this permit.

**Table 1**

Emission Source – Operation	Controlled Facility-Wide Regulated Pollutant Emissions (tons/yr)								
	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	SO <sub>2</sub>	CO	VOC	HAP Total	HAP Styrene	HAP MMA
<b>Reinforced Plastics Operations</b>									
<b>30501 – Diving Boards</b>	-	-	-	-	-	10.10	10.10	10.10	-
<b>30506 – Infusion Closed Molding Area 1</b>									
Gel Coating	-	-	-	-	-	1.86	1.86	1.77	0.09
Infusion	-	-	-	-	-	1.81	1.81	1.81	-
Gluing	-	-	-	-	-	0.08	.08	-	0.08
<b>30508 – Infusion Closed Molding Area 2</b>	-	-	-	-	-	0.05	0.05	0.05	0.00
<b>30509 – Fiberglass Diving Bases (incl. Spray Booths 1-3)</b>	-	-	-	-	-	3.64	3.64	3.46	0.18
<b>30510 – Fiberglass Hand Lay-Up (Reinforcements for Infusion Areas)</b>	-	-	-	-	-	0.77	0.77	0.77	-

**Table 1 (Continued)**

Emission Source – Operation	Controlled Facility-Wide Regulated Pollutant Emissions (tons/yr)								
	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	SO <sub>2</sub>	CO	VOC	HAP Total	HAP Styrene	HAP MMA
<b>30511 – Aluminum Diving Boards (Spray Booth)</b>									
Xylene	-	-	-	-	-	0.10	0.10		
MEK	-	-	-	-	-	0.06	-		
Toluene	-	-	-	-	-	0.01	0.01		
<b>Other Facility Operations</b>									
Wood Shop and Production Area Dust Collection System Normalized to 21% (18.48/89.03) of Allowable	1.84 <sup>1</sup>	1.84 <sup>1</sup>	-	-	-	-	-	-	-
<b>Facility Baseline (2019)</b> Based on supplied current production data	<b>1.84<sup>1</sup></b>	<b>1.84<sup>1</sup></b>	-	-	-	<b>18.48</b>	<b>18.42</b>	<b>17.96</b>	<b>0.35</b>
<b>Allowable (See TSD)</b>	<b>8.91<sup>1</sup></b>	<b>8.91<sup>1</sup></b>				<b>89.03</b>	<b>89.03</b>	<b>72.77</b>	<b>9.06</b>

<sup>1</sup> Note: These emissions estimates have been determined by the Control Officer to be insignificant.  
(See page 3 of Air Quality Permit #6229 - TSD).

**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 CONDITIONS**

*(Unless otherwise noted, references in this permit are to Title 17 of the Pima County Code (PCC), Arizona Revised Statutes (ARS), Arizona Administrative Code (AAC), or the Pima County State Implementation Plan (SIP). Underlined text are hyperlinked references to either definitions in this permit, Conditions within the permit, or to external web servers that contain the referenced provision)*

### **1. Permit Expiration and Renewal**

[PCC 17.11.090.A & PCC 17.12.010.D.1]

- a. This permit is valid for a period of five years from the date of issuance.
- b. The Permittee shall submit an application for renewal of this permit at least 6 months, but not more than 18 months prior to the date of permit expiration.

### **2. Compliance with Permit Conditions**

[PCC 17.12.040.A.8.a & b]

- a. The Permittee shall comply with all Conditions of this permit including all applicable requirements of the 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.

### **3. Permit Revision, Reopening, Revocation and Reissuance, or Termination for Cause**

[PCC 17.12.040.A.8.c & PCC 17.12.130]

- 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, 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:
  - i. Additional applicable requirements under the Clean Air Act become applicable to a major source with a remaining 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 17.12.140.B. Any permit reopening required pursuant to this paragraph shall comply with provisions in PCC 17.12.140 for permit renewal and shall reset the five-year permit term.
  - ii. Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the Class I permit.
  - iii. 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.
  - iv. 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 reissue 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, except for reopenings under Condition 3.b.i above, affect only those parts of the permit for which cause to reopen exist. Such reopenings shall be made as expeditiously as practicable. Permit reopenings for reasons other than those stated in Condition 3.b.i above shall not result in a resetting of the five-year permit term.

#### 4. Posting of Permit

[PCC 17.11.060, SIP Rule 222 & ARS 49-485]

The Permittee shall maintain a complete copy of this permit onsite. If it is not feasible to maintain a copy of the permit 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.

#### 5. Fee Payment

[PCC 17.12.040.A.9 & PCC 17.12.220, SIP Reg 24]

The Permittee shall pay fees to the Control Officer pursuant to PCC 17.12.220.

#### 6. Annual Emissions Inventory Questionnaire

[PCC 17.12.160 & SIP Rule 623]

- a. The Permittee shall complete and submit to the Control Officer 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 17.12.160.

#### 7. Compliance Certification

[PCC 17.12.040.A.5 & PCC 17.12.080.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 on the dates and frequency specified in Condition 52.a of this permit.

- a. The compliance certification shall include the following:
  - i. 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;
  - ii. 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 17.12.040 (A)(3), (monitoring including the related recordkeeping and reporting requirements that verify compliance with monitoring). If necessary, the Permittee also shall identify any other material information that must be included in the certification to comply with § 113(c)(2) of the Clean Air Act, which prohibits knowingly making a false certification or omitting material information;
  - iii. 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 be based on the methods or means in Condition 7.a.ii above. The certification shall identify each deviation and take it into account in the compliance certification;

- iv. 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;
  - v. All instances of deviations from permit requirements reported pursuant to Condition 11.b as well as progress reports on all outstanding compliance schedules submitted pursuant to PCC 17.12.080; and
  - vi. 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**

**8. Certification of Truth, Accuracy and Completeness**

[PCC 17.12.080.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.

**9. Inspection and Entry**

[PCC 17.12.080.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.

**10. Permit Revision Pursuant to Federal Hazardous Air Pollutant Standard**

[PCC 17.12.010.D.3]

If this source becomes subject to a standard promulgated by the Administrator pursuant to § 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.

## 11. Excess Emissions, Permit Deviations, and Emergency Reporting

### a. Excess Emissions Reporting

[PCC 17.12.170]

#### i. 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. Such report shall be in two parts as specified below:

(i) Notification by telephone, facsimile or e-mail within 24 hours of the time when the Permittee first learned of the occurrence of excess emissions including all available information in Condition 11.a.i.(b) below. The number to call to report excess emissions is **520-724-7400**. The facsimile number to report excess emissions is **520-838-7432**. The e-mail to report excess emissions is [Air.Permits@pima.gov](mailto:Air.Permits@pima.gov)

(ii) Detailed written notification by submission of an excess emissions report within 72 hours of the notification in Condition 11.a.i.(a)(i) above. Notifications should be sent to:

**PDEQ Air Program 33 N. Stone Avenue, Suite 700, Tucson, Arizona 85701.**  
[Air.Permits@pima.gov](mailto:Air.Permits@pima.gov)

(b) The 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 date, 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) If the excess emissions were the result of a malfunction, the steps taken 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 this permit contains procedures governing source operation during periods of startup or malfunction and the excess emissions resulted from start-up or malfunction, a list of the steps taken to comply with permit procedures.

ii. In the case of continuous or recurring excess emissions, the notification requirements 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 Condition 11.a.i above.

## b. Permit Deviations Reporting

[PCC 17.12.040.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. Prompt reporting shall mean that the report was submitted to the Control Officer by certified mail, facsimile, e-mail ([Air.Permits@pima.gov](mailto:Air.Permits@pima.gov)) or hand delivery within two working days of the time when emission limitations were exceeded due to an emergency or within two working days of the time when the Permittee first learned of the occurrence of a deviation from a permit requirement.

## c. Emergency Provision

[PCC 17.12.040.E]

- i. 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.
- ii. An emergency constitutes an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if Condition 11.c.iii below is met.
- iii. 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, e-mail ([Air.Permits@pima.gov](mailto:Air.Permits@pima.gov)) 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.
- iv. In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- v. This provision is in addition to any emergency or upset provision contained in any applicable requirement.

## d. Compliance Schedule

[ARS § 49-480.F.3 &amp; 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 17.12.180]

## i. 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 §§ 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.

## ii. Affirmative Defense for Malfunctions

Emissions in excess of an applicable emission limitation due to malfunction shall constitute a violation. The Owner or operator 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 in Condition 11.a above 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.

iii. Affirmative Defense for Startup and Shutdown

- (a) Except as provided in Condition 11.e.iii.(b) below, 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 Condition 11.a above 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 Condition above.

iv. 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 Condition 11.e.ii above.

v. Demonstration of Reasonable and Practicable Measures

For an affirmative defense under Condition 11.e.ii or iii above, the Permittee of the source shall demonstrate, through submission of the data and information required by Conditions 11.e.i through v and Condition 11.a above, that all reasonable and practicable measures within the owner or operator's control were implemented to prevent the occurrence of the excess emissions.

**12. Recordkeeping Requirements**

[PCC 17.12.040.A.4]

- a. The Permittee shall keep records of all required monitoring information including recordkeeping requirements established pursuant to PCC 17.12.080, where applicable, for the following:
  - i. The date, place as defined in the permit, and time of sampling or measurements;
  - ii. The date(s) analyses were performed;
  - iii. The name of the company or entity that performed the analyses;
  - iv. A description of the analytical techniques or methods used;
  - v. The results of such analyses; and
  - vi. 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 or other data recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.
- c. All required records shall be maintained either in an unchangeable electronic format or printed records including hand written forms or logbooks utilizing indelible ink.

**13. Reporting Requirements**

[PCC 17.12.040.A.5]

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

- a. Compliance certifications pursuant to Condition 7 above.
- b. Excess emissions; permit deviations, and emergency reports in accordance with Condition 11 above.
- c. Performance test results in accordance with Condition 17.g below.
- d. Other reports required by any of the Conditions in Part B of this permit.

**14. Duty to Provide Information**

[PCC 17.12.040.A.8.e, PCC 17.12.010.H, &amp; PCC 17.12.010.I, SIP Rule 621]

- 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.

**15. Permit Amendment or Revision**

[PCC 17.12.100, PCC 17.12.110 &amp; PCC 17.12.120]

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 Condition 16 below as follows:

- a. Administrative Permit Amendment (PCC 17.12.100);
- b. Minor Permit Revision (PCC 17.12.110);
- c. Significant Permit Revision (PCC 17.12.120).

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

**16. Facility Changes Allowed Without Permit Revisions**

[PCC 17.12.090]

- a. The Permittee may make changes without a permit revision if all of the following apply:
  - (i) 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(24);
  - (ii) 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;
  - (iii) The changes do not violate any applicable requirements or trigger any additional applicable requirements;
  - (iv) The changes satisfy all requirements for a minor permit revision under PCC 17.12.110; and
  - (v) 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 Conditions 16.a, d, and e.
- 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 17.12.040.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 Condition 16.d below. This provision is available if the permit does not provide for the emissions trading as a minor permit revision.
- d. For each change under Conditions 16.a through c above, 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:
  - (i) When the proposed change will occur;
  - (ii) A description of the change;
  - (iii) Any change in emissions of regulated air pollutants;
  - (iv) The pollutants emitted subject to the emissions trade, if any;
  - (v) 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;
  - (vi) If the emissions trading provisions of the implementation plan are invoked, then the permit requirements with which the source will comply; and
  - (vii) Any permit term or Condition that is no longer applicable as a result of the change.
- f. The permit shield described in Condition 20 below shall not apply to any change made under this Condition. 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 17.12.040.A11 shall not require any prior notice under this section.
- h. Notwithstanding any other part of this Condition, 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 these provisions over the term of the permit, do not satisfy the requirements in Condition 16.a.

## 17. Testing Requirements

[PCC 17.11.210, SIP Reg 50, SIP Rule 212]

- a. New sources required to conduct performance testing shall do so within 60 days after the source has achieved the capability to operate at its maximum production rate on a sustained basis but no later than 180 days after initial startup of such sources. The Permittee shall conduct performance testing as specified in Part B of this permit and at such other times as may be required by the Control Officer. The Permittee shall furnish the Control Officer a written report or the results of the tests.
- b. Operational Conditions
 

Performance tests shall be conducted under such conditions as the Control Officer shall specify to the plant operator based on representative performance of the source unless other conditions are required by the applicable test method or in this permit. The Permittee shall make available to the Control Officer such records as may be necessary to determine the conditions of the performance tests. 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.
- c. 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 17.11.210.B. For opacity standards in this permit, the opacity of visible emissions shall be determined by EPA Test Method 9, Appendix A, 40 CFR Part 60 or by EPA approved Alternate Method ALT-082.

d. 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 17.11.210.D and the Arizona Testing Manual. This test plan must include the test duration, test location(s), test methods, and source operation and other parameters that may affect the test results.

e. Stack Sampling Facilities

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

- i. Sampling ports adequate for test methods applicable to the facility;
- ii. Safe sampling platform(s);
- iii. Safe access to sampling platform(s); and,
- iv. Utilities for sampling and testing equipment.

f. Interpretation of Final Results *(Please see Part B of the permit for Specific Conditions)*

Unless otherwise specified in Part B or Part C of this permit, 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 mean of the 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.

g. 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 and PCC 17.11.210.A. If additional time is needed to submit the results, the Permittee shall send a written request for an extension describing the circumstances and specifying the time needed to submit the report for approval by the Control Officer. [AZ Testing Manual Page 8 (4 weeks ~ 30 days)]

**18. Property Rights**

[PCC 17.12.040.A.8.d]

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

**19. Severability Clause**

[PCC 17.12.040.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 permit term or Condition of this permit being held invalid, the remainder of this permit shall not be affected thereby.

**20. Permit Shield**

[PCC 17.11.080]

Compliance with the Conditions of this permit shall be deemed compliance with the applicable requirements identified in the permit as of the date of permit issuance, provided that such applicable requirements are included and expressly identified in the permit. The permit shield shall not apply to any change made in accordance with Conditions 15.b and 16 above.

**21. Accident Prevention Requirements under The Clean Air Act (CAA § 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 §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.

**22. Requirement to Obtain Activity Permits**

[PCC Chapter 17.14]

a. The Permittee shall not allow or commence demolition or renovation of any NESHAP facility, as defined in 40 CFR Part 61, Subpart M, National Emission Standards for Hazardous Air Pollutants – Asbestos, without first obtaining an activity permit from the Control Officer in accordance with PCC 17.14.060. Should this stationary source, pursuant to 40 CFR Part 61, Subpart M, become subject to asbestos regulations when conducting any renovation or demolition at this premises, then the Permittee or operator shall submit proper notification as described in 40 CFR Part 61, 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.

[PCC 17.14.060 &amp; 40 CFR 61, Subpart M]

b. The Permittee shall not ignite, cause to be ignited, permit to be ignited, allow or maintain any open outdoor fire without first obtaining an activity permit from the Control Officer or delegated authority unless exempted under PCC 17.14.080.C.

[PCC 17.14.080]

c. The Permittee shall not conduct, cause, or allow land stripping, earthmoving, blasting, trenching or road construction without first obtaining an activity permit from the Control Officer in accordance with PCC 17.14.040.

[PCC 17.14.040]

**23. Stratospheric Ozone Depleting Substances**

[40 CFR 82 &amp; PCC 17.16.710]

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.

**24-25. [Reserved]**

## **PART B: SPECIFIC CONDITIONS**

*(Unless otherwise noted, references in this permit are to Title 17 of the Pima County Code (PCC), Arizona Revised Statutes (ARS), Arizona Administrative Code (AAC), or the Pima County State Implementation Plan (SIP). Underlined text are hyperlinked references to either definitions or Conditions within this permit, or to external web servers that contain the text of the referenced provision.)*

### **§ 1: Authority, Classification, and Permit Organization**

[PCC 17.11.010]

#### 26. Statutory Authority [PCC 17.11.010, 17.11.020, 17.11.090.A, 17.12.010 and ARS § 49-480, SIP Rules 103, 111, 301]

Emissions from the facility, specifically the emissions from the equipment and operations described in the permit application, which fall under SIC Code (3089), are subject to enforceable limitations in the Specific Conditions in this Part B. This permit is issued pursuant to ARS § 49-480 and authorizes the construction and/or operation of the equipment and operations listed in the equipment list in Attachment 2 of this permit. This authorization is based on the regulations in effect on the date of issuance of this permit, and a finding that the allowable emissions from the facility, specifically the emissions from the equipment and operations more fully described in the permit application constitute a “major source” within the meaning of PCC 17.04.340.A(128). Compliance with the Conditions of this permit shall be deemed to be compliant with any applicable requirement and regulation identified in this permit as of the date of issuance. Notwithstanding the above findings, this permit shall not relieve the Permittee nor their subcontractors from compliance with all local or county codes, state statutes and federal laws or from obtaining permits for other operations or activities when required.

#### 27. Permit Classification

Class I; Major Source; Stationary: The permitted facility sources constitute an existing major source of a single HAP (Stryrene), a major source of a combination of HAPs (Styrene and MMA), The facility is a synthetic minor source of VOC, and a true minor source of all other pollutants based on 8760 hours of operation per year and the limitations in this permit and other sources at the facility aggregated under the same SIC Code (3089).

#### 28. Permitted Sources & Permit Sections

Except as provided in Title 17 of the PCC, until this permit expires, or is revised, or is revoked, the Permittee is allowed to discharge air contaminants from the facility and equipment and operations listed in the equipment list in accordance with the limitations, standards and requirements in the Specific Conditions of this permit. The Specific Conditions in this Part B have been organized into the following permit sections (§§):

§ 1: Authority, Classification, and Permit Organization (This Section);

§ 2: Applicability;

§ 3: Definitions;

§ 4: Emission Limitations and Standards;

§ 5: Monitoring and Recordkeeping;

§ 6: Reporting Requirements; and

§ 7: Testing Requirements

#### Attachments

1: Applicable Regulations

2: Equipment List, Exempt Sources, & Insignificant Activities

3: Summary of Monitoring and Recordkeeping Requirements

4: Checklists and Sample Forms

#### 29. Applicability of more than one standard

[PCC 17.16.010.B SIP Rule 331.B]

If more than one emission limit or standard in this permit is applicable to the same source the more stringent standard or emission limit shall apply.

#### 30. [Reserved]

## § 2: Applicability

### 31. Sources Subject to NESHAP Subpart WWWW.

The facility is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) also known as the Maximum Achievable Control Technology (MACT) standards pursuant to 40 CFR Part 63, Subpart WWWW – Reinforced Plastic Composites (RPC) Production. [PCC 17.16.530.B(80)]

- a. 40 CFR Part 63, Subpart WWWW applies to each new or existing affected source at reinforced plastic composites production facilities. For the purpose of this permit, the facility as of the date of issuance of this permit constitutes an existing affected source.
- b. The affected source consists of all parts of the facility engaged in the following operations: Open molding, closed molding, centrifugal casting, continuous lamination, continuous casting, polymer casting, pultrusion, sheet molding compound (SMC) manufacturing, bulk molding compound (BMC) manufacturing, mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations on parts the Permittee also manufactures.
- c. The following operations are specifically excluded from any requirements in 40 CFR Part 63, Subpart WWWW, however such other operations and equipment at the facility may remain subject to PCC and the SIP:  
Application of mold sealing and release agents; mold stripping and cleaning; repair of parts that you did not manufacture, including non-routine manufacturing of parts; personal activities that are not part of the manufacturing operations (such as hobby shops on military bases); prepreg materials as defined in §63.5935; non-gel coat surface coatings; application of putties, polyputties, and adhesives; repair or production materials that do not contain resin or gel coat; research and development operations as defined in section 112(c)(7) of the CAA; polymer casting; and closed molding operations (except for compression/injection molding). Note that the exclusion of certain operations from any requirements applies only to operations specifically listed in this paragraph. The requirements for any co-located operations still apply.
- d. Production resins that must meet military specifications are allowed to meet the organic HAP limit contained in that specification. In order for this exemption to be used, you must supply to the permitting authority the specifications certified as accurate by the military procurement officer, and those specifications must state a requirement for a specific resin, or a specific resin HAP content. Production resins for which this exemption is used must be applied with nonatomizing resin application equipment unless you can demonstrate this is infeasible. You must keep a record of the resins for which you are using this exemption.

### 32. Facility-Wide Operations

Title 17 of the PCC applies to the facility and all sources of air contaminants located at the facility except as exempted in the Technical Support Document associated with this permit. Facility-wide provisions in this permit may include voluntary facility-wide (synthetic) operating limitations, general control requirements, operation and maintenance requirements, general materials handling requirements, provisions for gaseous and odorous materials, opacity (optical density), and visibility limiting standards that apply to the facility. In addition Facility-Wide operations may include prescribed visible emissions (VE) checks and/or periodic Method 9 opacity determinations for permitted sources and/or documentation of any necessary and reasonable precautions to control fugitive dust.

33-35 [Reserved]

### § 3: Definitions

The following definitions shall have the meaning as defined in the Clean Act or Title 17 of the Pima County Code, and NESHAP Subpart WWWW unless otherwise provided in this permit. Terms below marked with an asterisk (\*) are terms defined in NESHAP Subpart WWWW. If a term is not otherwise defined, it shall be interpreted in accordance with normal business use.

**Activator** means a solution which contains dibutyl phthalate in a quantity of at least 10 percent and no greater than 30 percent by weight.

**Adhesive** means an adhesive which contains greater than 60% methyl methacrylate monomer and less than 1 percent isopropanol, by weight.

**Administrator** means the Administrator of the U.S. Environmental Protection Agency or his/her authorized representative or the Administrator of a state air pollution control agency. Contact Information: Phone (415) 947-8715; Website: [www.epa.gov/region9](http://www.epa.gov/region9)

**Air Pollution or Air Pollutant** means the presence in the outdoor atmosphere of one or more air contaminants or combination thereof, in sufficient quantities, which either alone or in connection with other substances, by reason of their concentration and duration are or tend to be injurious to human, plant, or animal life; or causes damage to property; or unreasonably interferes with the enjoyment of life or property of a substantial part of a community, or obscures visibility; or which in any way degrades the quality of the ambient air below the standards established by the board of supervisors.

**Bulk molding compound (BMC)\*** means a putty-like molding compound containing resin(s) in a form that is ready to mold. In addition to resins, BMC may contain catalysts, fillers, and reinforcements. Bulk molding compound can be used in compression molding and injection molding operations to manufacture reinforced plastic composites products.

**BMC manufacturing\*** means a process that involves the preparation of BMC.

**Centrifugal casting\*** means a process for fabricating cylindrical composites, such as pipes, in which composite materials are positioned inside a rotating hollow mandrel and held in place by centrifugal forces until the part is sufficiently cured to maintain its physical shape.

**Charge\*** means the amount of SMC or BMC that is placed into a compression or injection mold necessary to complete one mold cycle.

**Cause** means with respect to the Control Officer's ability to deny a permit application or terminate a permit that:

- a. The Control Officer has reasonable cause to believe that the permit was obtained by fraud or misrepresentation.
- b. The Control Officer determines that an applicant has failed to disclose a material fact required by the permit application form or the regulation applicable to the permit, of which the applicant had or should have had knowledge at the time the application was submitted.
- c. The terms and Conditions of the permit have been or are being violated.

**Cleaning\*** means removal of composite materials, such as cured and uncured resin from equipment, finished surfaces, floors, hands of employees, or any other surfaces.

**Clear production gel coat\*** means an unpigmented, quick-setting resin used to improve the surface appearance and/or performance of composites. It can be used to form the surface layer of any composites other than those used for molds in tooling operations.

**Closed molding\*** means a grouping of processes for fabricating composites in a way that HAP-containing materials are not exposed to the atmosphere except during the material loading stage (*e.g.*, compression molding, injection molding, and resin transfer molding). Processes where the mold is covered with plastic (or equivalent material) prior to resin application, and the resin is injected into the covered mold are also considered closed molding.

**Composite\*** means a shaped and cured part produced by using composite materials.

**Composite materials\*** means the raw materials used to make composites. The raw materials include styrene containing resins. They may also include gel coat, monomer, catalyst, pigment, filler, and reinforcement.

**Compression molding\*** means a closed molding process for fabricating composites in which composite materials are placed inside matched dies that are used to cure the materials under heat and pressure without exposure to the atmosphere. The addition of mold paste or in-mold coating is considered part of the closed molding process. The composite materials used in this process are generally SMC or BMC.

**Compression/injection molding\*** means a grouping of processes that involves the use of compression molding and/or injection molding.

**Concealment** with regard to an emission source shall include:

- a. The use of gaseous diluents to achieve compliance with an opacity standard or with a standards which based on the concentration of a pollutant in the gasses discharged to the atmosphere.
- b. Operating in a piecemeal fashion to avoid compliance with a standard that would otherwise apply to the source on the basis of its size; and
- c. Operating in a manner, under conditions, or during such times that emissions cannot be observed.

**Continuous casting\*** means a continuous process for fabricating composites in which composite materials are placed on an in-line conveyor belt to produce cast sheets that are cured in an oven.

**Continuous lamination\*** means a continuous process for fabricating composites in which composite materials are typically sandwiched between plastic films, pulled through compaction rollers, and cured in an oven. This process is generally used to produce flat or corrugated products on an in-line conveyor.

**Controlled emissions\*** means those organic HAP emissions that are vented from a control device to the atmosphere.

**Control Officer** means the director of Pima County Department of Environmental Quality who shall serve as the executive head of the Pima County air quality control district, or one of his authorized agents. Contact Information: Phone: (520) 724-7400; [Pima County DEQ - air](#).

**Corrosion-resistant gel coat\*** means a gel coat used on a product made with a corrosion-resistant resin that has a corrosion-resistant end-use application.

**Corrosion-resistant end-use applications\*** means applications where the product is manufactured specifically for an application that requires a level of chemical inertness or resistance to chemical attack above that required for typical reinforced plastic composites products. These applications include, but are not limited to, chemical processing and storage; pulp and paper production; sewer and wastewater treatment; power generation; potable water transfer and storage; food and drug processing; pollution or odor control; metals production and plating; semiconductor manufacturing; petroleum production, refining, and storage; mining; textile production; nuclear materials storage; swimming pools; and cosmetic production, as well as end-use applications that require high strength resins.

**Corrosion-resistant industry standard\*** includes the following standards: ASME RTP-1 or Sect. X; ASTM D5364, D3299, D4097, D2996, D2997, D3262, D3517, D3754, D3840, D4024, D4160, D4161, D4162, D4184, D3982, or D3839; ANSI/AWWA C950; UL 215, 1316 or 1746, IAPMO PS-199, or written customer requirements for resistance to specified chemical environments.

**Corrosion-resistant product\*** means a product made with a corrosion-resistant resin and is manufactured to a corrosion-resistant industry standard, or a food contact industry standard, or is manufactured for corrosion-resistant end-use applications involving continuous or temporary chemical exposures.

**Corrosion-resistant resin\*** means a resin that either:

- a. Displays substantial retention of mechanical properties when undergoing ASTM C-581 coupon testing, where the resin is exposed for 6 months or more to one of the following materials: Material with a pH  $\geq 2.0$  or  $\leq 3.0$ , oxidizing or reducing agents, organic solvents, or fuels or additives as defined in 40 CFR 79.2. In the coupon testing, the exposed resin needs to demonstrate a minimum of 50 percent retention of the relevant mechanical property compared to the same resin in unexposed condition. In addition, the exposed resin needs to demonstrate an increased retention of the relevant mechanical property of at least 20 percentage points when compared to a similarly exposed general-purpose resin. For example, if the general-purpose resin retains 45 percent of the relevant property when tested as specified above, then a corrosion-resistant resin needs to retain at least 65 percent (45 percent plus 20 percent) of its property. The general-purpose resin used in the test needs to have an average molecular weight of greater than 1,000, be formulated with a 1:2 ratio of maleic anhydride to phthalic anhydride and 100 percent diethylene glycol, and a styrene content between 43 to 48 percent; or
- b. Complies with industry standards that require specific exposure testing to corrosive media, such as UL 1316, UL 1746, or ASTM F-1216.

**Deviation** means any instance in which an affected source, subject to this permit, or an owner or operator of such a source, fails to meet any requirement or obligation established by this permit, including but not limited to any emission limitation or work practice standard; or fails to meet any emission limitation, (including any operating limit), or work practice standard in 40 CFR Part 63, Subpart WWWW during startup, shutdown, or malfunction (SSM), regardless of whether or not such failure is permitted by 40 CFR Part 63, Subpart WWWW.

Note: Subpart WWWW of 40 CFR Part 63 requires a startup, shutdown, and malfunction plan only for sources using add on controls.

**Doctor box\*** means the box or trough on an SMC machine into which the liquid resin paste is delivered before it is metered onto the carrier film.

**Director** means the director of the Arizona Department of Environmental Quality. Contact Information: Phone: (602) 771-2285; ADEQ - Air Quality Division

**Federally enforceable** means:

- a. The requirements of the New Source Performance Standards and National Emission Standards for Hazardous Air Pollutants contained in Articles VI and Article VII of Chapter 17.16.
- b. The requirements of such other state or county rules or regulations approved by the administrator, including the requirements of approved state and county operating and new source review permit programs that have been approved by the administrator.
- c. The requirements of any applicable implementation plan.
- d. Emissions limitations, controls, and other requirements, and any associated monitoring, recordkeeping and reporting requirements, which are entered into voluntarily by a source pursuant to PCC 17.11.190.

**Filament application\*** means an open molding process for fabricating composites in which reinforcements are fed through a resin bath and wound onto a rotating mandrel. The materials on the mandrel may be rolled out or worked by using nonmechanical tools prior to curing. Resin application to the reinforcement on the mandrel by means other than the resin bath, such as spray guns, pressure-fed rollers, flow coaters, or brushes is not considered filament application.

**Filled Resin\*** means that fillers have been added to a resin such that the amount of inert substances is at least 10 percent by weight of the total resin plus filler mixture. Filler putty made from a resin is considered a filled resin.

**Fillers\*** means inert substances dispersed throughout a resin, such as calcium carbonate, alumina trihydrate, hydrous aluminum silicate, mica, feldspar, wollastonite, silica, and talc. Materials that are not considered to be fillers are glass fibers or any type of reinforcement and microspheres.

**Fire retardant gel coat\*** means a gel coat used for products for which low-flame spread/low-smoke resin is used.

**Fluid impingement technology\*** means a spray gun that produces an expanding non-misting curtain of liquid by the impingement of low-pressure uninterrupted liquid streams.

**Food contact industry standard\*** means a standard related to food contact application contained in Food and Drug Administration's regulations at 21 CFR 177.2420.

**Gel Coat\*** means a quick-setting resin used to improve surface appearance and/or performance of composites. It can be used to form the surface layer of any composites other than those used for molds in tooling operations.

**Gel coat application\*** means a process where either clear production, pigmented production, white/off-white or tooling gel coat is applied.

**Hazardous Air Pollutant (HAP)** means a pollutant listed in § 112(b) of the CAA.

**HAP containing material** means a material that contains any volatile or nonvolatile HAP that is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d) at a concentration greater than 0.1 percent by mass, or greater than 1.0 percent by mass for any other HAP compound. For the purpose of determining whether materials used contain the HAP compounds, the Permittee may rely on formulation data provided by the manufacturer or supplier, such as the safety data sheet (SDS), as long as it represents HAP compound in the material that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d) and at 1.0 percent by mass or more for other HAP compounds.

**HAP-containing materials storage\*** means an ancillary process which involves keeping HAP-containing materials, such as resins, gel coats, catalysts, monomers, and cleaners, in containers or bulk storage tanks for any length of time. Containers may include small tanks, totes, vessels, and buckets.

**High Performance gel coat\*** means a gel coat used on products for which National Sanitation Foundation, United States Department of Agriculture, ASTM, durability, or other property testing is required.

**High strength gel coat\*** means a gel coat applied to a product that requires high strength resin.

**High Sulfur Oil** means fuel oil containing 0.90 percent or more by weight of sulfur.

**Injection molding\*** means a closed molding process for fabricating composites in which composite materials are injected under pressure into a heated mold cavity that represents the exact shape of the product. The composite materials are cured in the heated mold cavity.

**Low Flame Spread/Low Smoke Products\*** means products that meet the following requirements. The products must meet both the applicable flame spread requirements and the applicable smoke requirements. Interior or exterior building application products must meet an ASTM E-84 Flame Spread Index of less than or equal to 25, and Smoke Developed Index of less than or equal to 450, or pass National Fire Protection Association 286 Room Corner Burn Test with no flash over and total smoke released not exceeding 1000 meters square. Mass transit application products must meet an ASTM E-162 Flame Spread Index of less than or equal to 35 and ASTM E662 Smoke Density Ds @ 1.5 minutes less than or equal to 100 and Ds @ 4 minutes less than to equal to 200. Duct application products must meet ASTM E084 Flame Spread Index less than or equal to 25 and Smoke Developed Index less than or equal to 50 on the interior and/or exterior of the duct.

**Major source threshold** means the lowest applicable emissions rate for a pollutant that would cause the source to be a major source as defined in PCC 17.04.340.A.128.

**Malfunction** means any sudden and unavoidable failure of APC equipment, process equipment or a process to operate in a normal manner, but does not include failures that are caused by poor maintenance, careless operations or any other upset condition or equipment breakdown that could have been prevented by the exercise of reasonable care.

- a. The Permittee has an affirmative defense for excess emissions due to malfunction, startup, and shutdown as provided in Condition 11.e of this permit.
- b. For NESHAP sources listed in this permit: [40 CFR 63.6(e)]  
During a period of startup, shutdown, or malfunction, the general duty to minimize emissions requires that the owner or operator reduce emissions from the affected source to the greatest extent which is consistent with safety and good air pollution control practices. The general duty to minimize emissions during a period of startup, shutdown, or malfunction does not require the owner or operator to achieve emission levels that would be required by the applicable standard at other times if this is not consistent with safety and good air pollution control practices, nor does it require the owner or operator to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved.

**Material permit condition** means a condition that satisfies all of the following:

- a. The condition is in a permit or permit revision issued by the Control Officer.
- b. The condition is identified within the permit as a material permit condition.
- c. The condition is one of the following:
  - i. An enforceable emission standard imposed to avoid classification as a major modification or major source or to avoid triggering any other applicable requirement.
  - ii. A requirement to install, operate or maintain a maximum achievable control technology or hazardous air pollutant reasonably available control technology required pursuant to the requirements of A.R.S. § 49-426.06.
  - iii. A requirement for the installation or certification of a monitoring device.
  - iv. A requirement for the installation of APC equipment.
  - v. A requirement for the operation of APC equipment.
  - vi. Any opacity standard required by Section 111 (Standards of Performance for New Stationary Sources) or Title I, Part C or D (Air Pollution Prevention and Control) of the Act.
- d. Violation of the condition is not covered by subsections A through F, or H through J of A.R.S. § 49-464 or subsections A through F, or H through J of A.R.S. § 49-514.

**Manual resin application\*** means an open molding process for fabricating composites in which composite materials are applied to the mold by pouring or by using hands and nonmechanical tools, such as brushes and rollers. Materials are rolled out or worked by using nonmechanical tools prior to curing. The use of pressure-fed rollers and flow coaters to apply resin is not considered manual resin application.

**Mechanical resin application\*** means an open molding process for fabricating composites in which composite materials (except gel coat) are applied to the mold by using mechanical tools such as spray guns, pressure-fed rollers, and flow coaters. Materials are rolled out or worked by using nonmechanical tools prior to curing.

**Mixing\*** means the blending or agitation of any HAP-containing materials in vessels that are 5.00 gallons (18.9 liters) or larger, and includes the mixing of putties or polyputties. Mixing may involve the blending of resin, gel coat, filler, reinforcement, pigments, catalysts, monomers, and any other additives.

**Mobile equipment** means any device that may be drawn and/or driven on a roadway including, but not limited to, heavy-duty trucks, truck trailers, fleet delivery trucks, buses, mobile cranes, bulldozers, street cleaners, agriculture equipment, motor homes, and other recreational vehicles (including camping trailers and fifth wheels).

**Modification or modify** means a physical change in or change in the method of operation of a source that increases the emissions of any regulated air pollutant emitted by such source by more than any relevant de minimis amount or that results in the emission of any regulated air pollutant not previously emitted by more than such de minimis amount. An increase in emissions at a minor source shall be determined by comparing the source's potential to emit before and after the modification. The following exemptions apply:

- a. A physical or operational change does not include routine maintenance, repair or replacement.

- b. An increase in the hours of operation or if the production rate is not considered an operational change unless such increase is prohibited under any federally enforceable permit condition or other permit condition that is enforceable as a practical matter.
- c. A change in ownership at a source is not considered a modification.

**Mold\*** means a cavity or matrix into or onto which the composite materials are placed and from which the product takes its form.

**Neat gel coat\*** means the resin as purchased for the supplier, but not including any inert fillers.

**Nonatomized mechanical application\*** means the use of application tools other than brushes to apply resin and gel coat where the application tool has documentation provided by its manufacturer or user that this design of the application tool has been organic HAP emissions tested, and the test results showed that use of this application tool results in organic HAP emissions that are no greater than the organic HAP emissions predicted by the applicable nonatomized application equation(s) in Table 1 to this subpart. In addition, the device must be operated according to the manufacturer's directions, including instructions to prevent the operation of the device at excessive spray pressures. Examples of nonatomized application include flow coaters, pressure fed rollers, and fluid impingement spray guns.

**Noncorrosion-resistant resin\*** means any resin other than a corrosion-resistant resin or a tooling resin.

**Noncorrosion-resistant product\*** means any product other than a corrosion-resistant product or a mold.

**Nonpoint Source** means, for the purpose of this permit, any source of air contaminants which due to a lack of an identifiable emission point or plume cannot be considered a point source, including fugitive dust producing activities. In applying this criteria, such items as air curtain destructors, heater planers, and conveyor transfer points shall be considered to have identifiable plumes.

**Non-routine manufacture\*** means that you manufacture parts to replace worn or damaged parts of a reinforced plastic composites product, or a product containing reinforced plastic composite parts, that was originally manufactured in another facility. For a part to qualify as non-routine manufacture, it must be used for repair or replacement, and the manufacturing schedule must be based on the current or anticipated repair needs of the reinforced plastic composites product, or a product containing reinforced plastic composite parts.

**Operation** means any physical or chemical action resulting in the change in location, form, physical properties or chemical character of a material. For the purpose of NESHAP, Subpart WWWW, **Operation\*** means a specific process typically found at a reinforced plastic composites facility. Examples of operations are noncorrosion-resistant manual resin application, corrosion-resistant mechanical resin application, pigmented gel coat application, mixing and HAP-containing materials storage.

**Operation group\*** means a grouping of individual operations based primarily on mold type. Examples are open molding, closed molding, and centrifugal casting.

**Open molding\*** means a process for fabricating composites in a way that HAP-containing materials are exposed to the atmosphere. Open molding includes processes such as manual resin application, mechanical resin application, filament application, and gel coat application. Open molding also includes application of resins and gel coats to parts that have been removed from the open mold.

**Petroleum liquids** means petroleum, condensate, and any finished or intermediate products manufactured in a petroleum refinery but does not mean Number 2 through Number 6 fuel oils as specified in ASTM D-396-90a (Specification for Fuel Oils), gas turbine fuel oils Numbers 2-GT through 4-GT as specified in ASTM D-2880-90a (Specification for Gas Turbine Fuel Oils), or diesel fuel oils Numbers 2-D and 4-D as specified in ASTM D-975-90 (Specification for Diesel Fuel Oils).

**Pigmented gel coat\*** means a gel coat that has a color, but does not contain 10 percent of more titanium dioxide by weight. It can be used to form the surface layer of any composites other than those used for molds in tooling operations.

**Polymer casting\*** means a process for fabricating composites in which composite materials are ejected from a casting machine or poured into an open, partially open, or closed mold and cured. After the composite materials are poured into the mold, they are not rolled out or worked while the mold is open, except for smoothing the material and/or vibrating the mold to remove bubbles. The composite materials may or may not include reinforcements. Products produced by the polymer casting process include cultured marble products and polymer concrete.

**Portable Source** means any building, structure, facility or installation subject to regulation under ARS § 49-426 that emits or may emit any air pollutant and is capable of being operated at more than one location.

**Preform Injection\*** means a form of pultrusion where liquid resin is injected to saturate reinforcements in an enclosed system containing one or more chambers with openings only large enough to admit reinforcements. Resin, which drips out of the chamber(s) during the process, is collected in closed piping or covered troughs and then into a covered reservoir for recycle. Resin storage vessels, reservoirs, transfer systems, and collection systems are covered or shielded from the ambient air. Preform injection differs from direct die injection in that the injection chambers are not directly attached to the die.

**Prepreg materials\*** means reinforcing fabric received precoated with resin which is usually cured through the addition of heat.

**Pultrusion\*** means a continuous process for manufacturing composites that have a uniform cross-sectional shape. The process consists of pulling a fiber-reinforcing material through a resin impregnation chamber or bath and through a shaping die, where the resin is subsequently cured. There are several types of pultrusion equipment, such as open bath, resin injection, and direct die injection equipment.

**Repair\*** means application of resin or gel coat to a part to correct a defect, where the resin or gel coat application occurs after the part has gone through all the steps of its typical production process, or the application occurs outside the normal production area. For purposes of this subpart, rerouting a part back through the normal production line, or part of the normal production line, is not considered repair.

**Resin transfer molding\*** means a process for manufacturing composites whereby catalyzed resin is transferred or injected into a closed mold in which fiberglass reinforcement has been placed.

**Sheet molding compound (SMC)\*** means a ready-to-mold putty-like molding compound that contains resin(s) processed into sheet form. The molding compound is sandwiched between a top and a bottom film. In addition to resin(s), it may also contain catalysts, fillers, chemical thickeners, mold release agents, reinforcements, and other ingredients. Sheet molding compound can be used in compression molding to manufacture reinforced plastic composites products.

**SMC manufacturing\*** means a process which involves the preparation of SMC.

**Source** means any building, structure, facility or installation that may cause or contribute to air pollution or the use of which may eliminate, reduce or control the emission of air pollution. Source also means the Permittee as a facility-wide entity.

**Tooling gel coat\*** means a gel coat that is used to form the surface layer of molds. Tooling gel coats generally have high heat distortion temperatures, low shrinkage, high barcol hardness, and high dimensional stability.

**Tooling resin\*** means a resin that is used to produce molds. Tooling resins generally have high heat distortion temperatures, low shrinkage, high barcol hardness, and high dimensional stability.

**Uncontrolled oven organic HAP emissions\*** means those organic HAP emissions emitted from the oven through closed vent systems to the atmosphere and not to a control device. These organic HAP emissions do not include organic HAP emissions that may escape into the workplace through the opening of panels or doors on the ovens or other similar fugitive organic HAP emissions in the workplace.

**Uncontrolled wet-out area organic HAP emissions\*** means any or all of the following: Organic HAP emissions from wet-out areas that do not have any capture and control, organic HAP emissions that escape from wet-out area enclosures, and organic HAP emissions from wet-out areas that are captured by an enclosure but are vented to the atmosphere and not to an add-on control device.

**Unfilled\*** means that there has been no addition of fillers to a resin or that less than 10 percent of fillers by weight of the total resin plus filler mixture has been added.

**Vapor-suppressed resin\*** means a resin containing a vapor suppressant added for the purpose of reducing styrene emissions during curing.

**VHAP Containing\*** means a HAP containing material that contains volatile HAP contaminants.

**Volatile Organic Compounds (VOC)\*** means any compound of carbon, excluding carbon monoxide (CO), carbon dioxide (CO<sub>2</sub>), carbonic acid, metallic carbides, or carbonates, and ammonium carbonate, which participates in atmospheric photochemical reactions. This includes any organic compound other than those in the definition in PCC 17.04.340.A(250), which have been determined to have negligible photochemical reactivity.

**Volatile Organic Liquid (VOL)** means any organic liquid which can emit volatile organic compounds (as defined in 40 CFR 51.100) into the atmosphere.

**White and off-white gel coat\*** means a gel coat that contains 10 percent of more titanium dioxide by weight.

**Work practice standard\*\*** means any design, equipment, work practice, or operational standard, or combination thereof, that is promulgated pursuant to section 112(h) of the Clean Air Act.

**§ 4: Emission Limitations and Standards**

[17.12.040.A.2]

36. Voluntary Limitations

[PCC 17.11.190]

**[Federally Enforceable & Material Permit Conditions]**

a. Reinforced Plastic Composites (RPC) Production

- i. The Permittee shall not conduct any filament winding, centrifugal casting, continuous lamination/casting, or pultrusion operations without submitting a significant revision as provided in Condition 15 and demonstrating how the facility will comply with 40 CFR Part 63, Subpart WWWW and Title 17 of the PCC.
- ii. The Permittee shall not exceed the following emission rates from the facility:
  - (a) 90 Tons/year of VOC; and
  - (b) 10 Tons/year of any single HAP, except styrene as allowed in 40 CFR Part 63, Subpart WWWW.
- iii. The Permittee shall not use more polyester resin and vinyl esters or gel coat resin products calculated as a 12 month rolling total, than listed in the following table:

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

- iv. The Permittee shall only use non-atomized spray to apply the polyester resin and vinyl esters.
- v. Of the 361,771 pounds of gelcoats allowed per 12-month period in Condition 36.a.ii, no more than 56,530 pounds per 12-month period may be applied in the diving board open molding operation.
- vi. The Permittee shall not apply any gel coat product using mechanized spray equipment except as provided in Condition 36.a.v.
- vii. Unless the Permittee submits a facility change notification pursuant to Condition 16 demonstrating compliance with 40 CFR Part 63, Subpart WWWW, the Permittee shall not use any polyester or vinyl ester product that contains more than 40.0 percent (40.0%) by weight styrene (as applied) nor shall resins used in production processes contain HAPs in excess of the values in the following Table.
 

[40 CFR 63.5810(d)(1) Table 7, Row #5]

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%

- viii. Unless the Permittee submits a facility change notification pursuant to Condition 16 demonstrating compliance with 40 CFR Part 63, Subpart WWWW, the Permittee shall not use any gel coat products that exceed the allowable HAP contents in Condition 37.b.
 

[40 CFR 63.5810(d) Table 3]

b. Adhesives & Activators

- i. The Permittee shall not use greater than 6000 gallons of any Methacrylate adhesive, calculated as a 12-consecutive month total.
- ii. The Permittee shall not use greater than 600 gallons of any Methacrylate activator, calculated as a 12-consecutive month total.

c. Surface Coating Operations

- i. The Permittee shall not use greater than 2,400 gallons of paint products (excluding cleanup solvents), calculated as a 12-consecutive month total.
- ii. 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.

d. Facility Wide Operations

When so indicated in the equipment list of this permit, the Permittee shall restrict or limit the operations of emission sources to the respective operating limits.

37. RPC Production – Emission Limitations

- a. Organic HAP emission Factors: The Permittee shall use the equations in Table 1 of 40 CFR Part 63, Subpart WWWW and as summarized below, to calculate the organic HAP emission factors from RPC molding operations in order to determine compliance with the limits in this permit and the table set out in Condition 37.b.

**[Material Permit Condition]**

[40 CFR 63.5796, 63.5799(a)(1) and (b), and 63.5810(a)(1), and PCC 17.12.040.a.2]

Operation Type	Application	Resin Type	Organic HAP Emissions Factor (EF) Equation for Materials less than 33% Organic HAP <sup>1, 2</sup>	Organic HAP Emissions Factor (EF) Equation for Materials with 33% or more organic HAP <sup>1, 2</sup>
1) Open Molding	Manual Resin	Non-vapor-suppressed	$EF=0.126*\%HAP*2000$	$EF=((0.286*\%HAP)-0.0529)*2000$
2) Open Molding	Atomized Mechanical Resin	Non-vapor-suppressed	$EF=0.169*\%HAP*2000$	$EF=((0.714*\%HAP)-0.18)*2000$
3) Open Molding	Non-atomized Mechanical Resin	Non-vapor-suppressed	$EF=0.107*\%HAP*2000$	$EF=((0.157*\%HAP)-0.0165)*2000$
4) Open Molding	Atomized Mechanical Resin with robotic or automated spray control <sup>3</sup>	Non-vapor-suppressed	$EF=0.169*\%HAP*2000*0.77$	$EF=((0.714*\%HAP)-0.18)*0.77*2000$
5) Open Molding	Atomized Spray Gelcoat	Non-vapor-suppressed	$EF=0.445*\%HAP*2000$	$EF=((1.03646*\%HAP)-0.195)*2000$
6) Open Molding	Non-atomized Spray Gelcoat	Non-vapor-suppressed	$EF=0.185*\%HAP*2000$	$EF=((0.4506*\%HAP)-0.0529)*2000$
7) Open Molding	Manual Gelcoat	Non-vapor-suppressed	$EF=0.126*\%HAP*2000$ (for emission estimate only) <sup>4</sup>	$EF=((0.286*\%HAP)-0.0529)*2000$ (for emission estimate only) <sup>4</sup>
8) Closed Molding	Infusion Closed Molding	Non-vapor-suppressed	$EF=0.03*\%HAP*2000$	$EF=0.03*\%HAP*2000$ Note: Per AP-42

Footnotes:

- <sup>1</sup> The organic HAP emission factors have units of lbs of organic HAP per ton of resin or gelcoat applied.
- <sup>2</sup> Percent HAP means total weight percent of organic HAP (styrene, methyl methacrylate (MMA) and any other organic HAP) in the resin or gelcoat prior to the addition of fillers, catalyst, and promoters. Input the percent HAP as a decimal, i.e. 33% HAP should be input as 0.33 not 33.
- <sup>3</sup> This equation is based on an organic HAP emissions factor equation developed for mechanical atomized controlled spray. It may only be used for automated or robotic spray systems with atomized spray. All spray operations using hand held spray guns must use the appropriate mechanical atomized or mechanical non-atomized organic HAP emissions factor equation. Automated or robotic spray systems using non-atomized spray should use the appropriate non-atomized mechanical resin application.
- <sup>4</sup> Do not use this equation for determining compliance with emission limits in Tables 3 or 5 of 40 CFR Part 63, Subpart WWWW. To determine compliance with emission limits you must treat all gel coats as if it were applied as part of your gelcoat spray application operations. If you apply gelcoat by manual techniques only, you must treat the gelcoat as if it were applied with atomized spray and use Equation 1f of Table 1 to 40 CFR 63, Subpart WWWW (row 5) in the above table)

to determine compliance with the appropriate emission limits in Table 3 or 5 of 40 CFR Part 63, Subpart WWWW. To estimate emissions from manually applied gelcoat, you may either include the gelcoat quantities you apply manually with the quantities applied using spray, or use this equation to estimate emissions from the manually applied portion of your gelcoat.

- b. The Permittee must meet the following organic HAP emission limits and/or allowable organic HAP contents for all resins or gelcoats applied in RPC open molding operations:

**[Material Permit Condition]**  
[40 CFR 63.5796, 63.5799(a)(1) and (b), and 63.5810(a)(1), and 17.12.040.a.2]

Resin type and Application Method	Operation	Organic HAP emissions limit <sup>1</sup>	Highest Resin Weight Percent Organic HAP Content, Or Weighted Average Weight Percent Organic HAP Content Allowed <sup>2</sup>
Open molding – Corrosion resistant and/or High Strength (CR/HS)	Mecahnical Resin Application	113 lb/ton	46.4%
	Manual Resin Application	123 lb/ton	40.0%
Open molding – (non-CR/HS)	Mechanical ResinApplication	88 lb/ton	38.4%
	Manual Resin Application	87 lb/ton	33.7%
Open Molding – Tooling	Mechanical Resin Application	254 lb/ton	91.5%
	Manual Resin Application	157 lb/ton	46.0%
Open Molding – Gel Coat <sup>3</sup>	Tooling gel coating	440 lb/ton	40.0%
	White/off white pigmented gel coating	267 lb/ton	31.7%
	All other pigmented gel coating	377 lb/ton	37.0%
Open Molding – Gel Coat <sup>3</sup>	CR/HS or high performance gel coat	605 lb/ton	48.0%
	Fire retardant gel coat	854 lb/ton	60.0%
	Clear production gel coat	522 lb/ton	44.0%

Applicability: As required in 40 CFR 63.5796, 63.5805(a) through (c) and (g), 63.5810(a),(b) and (d), 63.5835(a), 63.5895(c) and (d), and 63.5915(c), the Permittee must meet the appropriate organic HAP emissions limits listed in the above table.

Footnotes:

- <sup>1</sup> Organic HAP emission limits for open molding are expressed as lb/ton. The Permittee must be at or below these values based on a 12 month rolling average.
- <sup>2</sup> A compliant resin or gelcoat means that its organic HAP content is used to calculate an organic HAP emissions factor, the factor calculated does not exceed the appropriate organic HAP emissions limit shown in the table.
- <sup>3</sup> These limits are for spray application of gelcoat. Manual gelcoat application must be included as part of spray gelcoat application for compliance purposes using the same organic HAP emissions factor equation and organic HAP emissions limit. If the Permittee only applies the gelcoat with manual application, the manually applied gelcoat will be treated as if it were applied with atomized spray for compliance determinations.

- c. Work Practice Standards **[Material Permit Conditions]**

As specified in 40 CFR § 63.5805, the Permittee must meet the following work practice standards that apply:

- i. For a closed molding operation using compression or injection molding, the Permittee must uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For

machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting. [Table 4 to Subpart WWWW, Row #1]

- ii. For a cleaning operation, 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. [Table 4 to Subpart WWWW, Row #2]

- iii. For HAP-containing materials storage operation, the Permittee must 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. [Table 4 to Subpart WWWW, Row #3]

- iv. For all mixing or BMC manufacturing operations, the Permittee must <sup>1</sup>:

[Table 4 to Subpart WWWW, Rows # 6 - 8]

- (a) 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.
- (b) Close any mixer vents when actual mixing is occurring except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to 95% efficient control device are exempt from this requirement.
- (c) Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

<sup>1</sup> Note: 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 actively being used to apply resin).

### 38. Surface Coating Operations – Local Standards

**[Locally Enforceable Conditions]**

- a. 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]**

- b. 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]

- c. The Permittee shall not either: [PCC 17.16.400.C.2]

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

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

- iii. For purposes of Condition 38.c, 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 below or which exceeds any of the following percentage composition limitations, referred to the total volume of solvent:

- (a) 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***.

- (b) A combination of aromatic compounds with eight or more carbon atoms to the molecule, except ethylbenzene: ***eight percent***.
- (c) A combination of ethylbenzene, ketones having branched hydrocarbon structures, trichloroethylene or toluene: ***20 percent***.

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 Condition 38.c.iii it shall be considered to be a member of the group having the least allowable percent of the total volume of solvents.

### 39. Facility – Wide Provisions

#### a. General Control Requirements

- i. The Permittee shall not cause or permit the planning, construction, installation, erection, modification, use, or operation of an emission source which will cause or contribute to a violation of a performance standard established in Title 17 of the Pima County Code.  
[PCC 17.11.020, PCC 17.16.020, SIP Rule 301]
- ii. The Permittee is prohibited from firing high sulfur oil in any stationary or portable source unless the applicant demonstrates to the satisfaction of the Control Officer both that sufficient quantities of low sulfur oil are not available for use by the source and that it has adequate facilities and contingency plans to insure that the sulfur dioxide ambient air quality standards set forth in PCC 17.08.020 will not be violated. Notwithstanding the prohibition to use high sulfur oil, other Conditions in this permit or Attachment to the permit may require lower fuel sulfur content limits.  
[PCC Chapter 17.16 §§ 010, 140, 160.G, 165.G, 340.H][SIP Rule 332 – Table 332(d)]  
**[Material Permit Condition]**
- iii. 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 Permittee to a degree that will adequately reduce or eliminate the discharge of air pollution to adjoining property.  
[PCC 17.16.020.B]  
**[Locally Enforceable Condition]**
- iv. The Permittee shall not construct, install, erect, use, replace, modify, or operate an emission source so as to conceal an emission which would otherwise be a violation of a standard in this permit.  
[PCC 17.20.040 SIP Rule 722]

#### b. Operation and Maintenance Requirements

[PCC 17.12.040.3.d, PCC 17.12.180.B & C., PCC 17.16.020.A]  
**[Federally Enforceable for NSPS and NESHAP sources]**

- i. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall to the extent practicable maintain and operate each source covered by this permit, including any associated APC or monitoring equipment, in a manner consistent with good air pollution control practices for minimizing emissions.  
[40 CFR 60.1(a) & 60.11(d)][40 CFR 63.6(a) & 63.6(e)]
- ii. Determination of whether acceptable operating and maintenance (O & M) procedures are being used will be based on information available to the Control Officer which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures (including the startup, shutdown or malfunction, and inspection of the source. [40 CFR 60.11(d), 63.6(e)]
- iii. The Control Officer may require the Permittee to develop, submit and follow an O & M plan for permitted sources (including any required startup, shutdown, or malfunction plan for NESHAP sources) prior to initial start up the source.  
[PCC 17.12.040.3.d][40 CFR 63.6(e)(3)]

c. Materials Handling Requirements

- i. The Permittee shall not transport or store VOC's without taking necessary and feasible measures to control evaporation, leakage, or other discharge into the atmosphere. For the purpose of this provision, VOC's shall be stored in closed containers when not in use. [PCC 17.16.400.A]  
**[Locally Enforceable Condition]**
- ii. Petroleum liquid storage tanks shall be equipped with a submerged filling device or acceptable equivalent for the control of hydrocarbon emissions. [PCC 17.16.230.B, SIP Rule 314]
- iii. All pumps and compressors which handle volatile organic compounds shall be equipped with mechanical seals or other equipment of equal efficiency to prevent the release of organic contaminants into the atmosphere. [PCC 17.16.230.D]  
**[Locally Enforceable Condition]**
- iv. 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]**

d. Gaseous or Odorous Materials

The Permittee shall not emit gaseous or odorous materials from equipment, operations or premises under his control in such quantities or concentrations as to cause air pollution. Malodorous matter shall include but not be limited to materials in Condition 39.c.iv. [SIP Rule 344, PCC 17.16.030]

e. Opacity

**[Federally Enforceable When Opacity Is Above 40%]**

- i. Except for fires permitted in accordance with PCC 17.14.080, the opacity of emissions from nonpoint sources shall not exceed 20%. [PCC 17.16.050.B.1 & C]  
**[Locally Enforceable Condition]**
- ii. The average optical density of plumes and effluents from a single point, multiple emission point, or fugitive emission source shall not exceed 20% opacity unless otherwise specified in the Conditions of this permit. [PCC 17.16.040 & Table 17.16.040 & PCC 17.16.130.B.1, SIP Rule 321]
- iii. Opacities (optical densities), measured according to the procedures in Condition 17.c, effluent shall be measured by a certified visible emissions evaluator with his/her natural eyes or with certified equipment, approximately following the procedures which were used during his/her certification, or by an approved and precisely calibrated in-stack monitoring instrument. [PCC 17.16.040.A.1, SIP Rule 321]
- iv. A violation of an opacity standard shall be determined by measuring and recording a set of consecutive, instantaneous opacities, and calculating the arithmetic average of the measurements within the set unless otherwise provided in this permit. The measurements shall be made at approximately fifteen-second intervals for a period of at least six minutes, and the number of required measurements shall be as specified in PCC Table 17.16.040. Sets need not be consecutive in time, and in no case shall two sets overlap. If the average opacity of the set of instantaneous measurements exceeds the maximum allowed by any rule, this shall constitute a violation. [PCC 17.16.040.A.2, SIP Rule 321]
- v. The use of air or other gaseous diluents solely for the purpose of achieving compliance with an opacity standard is prohibited. [PCC 17.16.040.A.3, SIP Rule 321]

- vi. When the presence of uncombined water is the only reason for failure of a source to otherwise meet the requirements as specified in Conditions 39.e and 39.f.ii, Conditions 39.e and 39.f.ii shall not apply. [PCC 17.16.040.B, SIP Rule 321]

f. Visibility Limiting Standard

- i. The Permittee shall not cause, suffer, allow or permit operations or activities likely to result in excessive amounts of airborne dust without taking reasonable precautions to prevent excessive amounts of particulate matter from becoming airborne. [PCC 17.16.050.A]  
**[Locally Enforceable Condition]**
- ii. The Permittee shall not cause, suffer, allow, or permit diffusion of visible emissions, including fugitive dust, beyond the property boundary line within which the emissions become airborne, without taking reasonably necessary and feasible precautions to control generation of airborne particulate matter. Sources may be required to cease temporarily the activity or operation which is causing or contributing to the emissions until reasonably necessary and feasible precautions are taken. [SIP Rule 343.A, PCC 17.16.050.D]
- iii. Condition 39.f.ii shall not apply when wind speeds exceed twenty-five (25) miles per hour (using the Beaufort Scale of Wind-Speed Equivalents, or as recorded by the National Weather Service). This exception does not apply if control measures have not been taken or were not commensurate with the size or scope of the emission source. [PCC 17.16.050.D.2, SIP Rule 343.B]
- iv. Condition 39.f.ii shall not apply to the generation of airborne particulate matter from undisturbed land. [PCC 17.16.050.D.3]  
**[Locally Enforceable Condition]**

40. [Reserved]

**§ 5: Monitoring and Recordkeeping Requirements**

[17.12.040]

**41. RPC Production**

- a. The Permittee shall demonstrate compliance with the product usage requirements in Conditions 36.a.iii and 36.a.v by monitoring and recording (within 10 days of the end of the month) the following:
  - i. The inventory/usage of resins and gel coats used in each operation type each month.
  - ii. 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 Condition 41.a.i to the record of the previous 11 consecutive months.
- b. The Permittee shall be considered in compliance with the spray application method in Condition 36.a.iv by actual inspection of the equipment showing that only non-atomized guns are used.
- c. In order to demonstrate compliance with the organic HAP limitations for resins and gel coats in Conditions 36.a.vii and 36.a.viii, the Permittee shall maintain onsite information provided by the material manufacturer, such as manufacturer's formulation data and safety data sheets (SDS). The Permittee shall use the following procedures, as applicable: [40 CFR 63.5797]
  - i. 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)]
  - ii. 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)]
  - iii. 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)]
  - iv. 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 17.11.190]
- d. As applicable, the Permittee must monitor and collect data on resin and gelcoat use, organic HAP contents, and operations where they are used to demonstrate continuous compliance with 40 CFR 63, Subpart WWW, and in accordance with 40 CFR § 63.5895 and Conditions 37.a and b. [40 CFR 63.5895]

**42. RPC 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:

- a. That the cleanup solvent used contains no VOC or HAP constituents (except as provided in Condition 37.c.ii).

- b. That all storage vessels containing VOC or HAP are completely covered (except as provided in Condition 37.c.iii).
- c. That covers on resin and gel coat mixers have no visible gaps (except as provided in Condition 37.c.iv).
- d. That odors and visible emissions are not observed outside the production buildings.
- e. That architectural coatings used on site are not photo-chemically reactive.
- f. 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 in Condition 42.a through e above) with discrepancies noted, and any corrective action taken.

#### 43. Adhesives & Activators

The Permittee shall demonstrate compliance with the product usage requirements in Condition 36.b by recording (within 10 days of the end of the month) the following:

- a. The inventory/usage of Methacrylate Adhesives and Activators used each month.
- b. Yearly totals of Methacrylate Adhesives and Activators used for the most recent 12-consecutive month period. These shall be kept by adding the totals from Condition 43.a above to the record of the previous 11 consecutive months.

#### 44. Surface Coating Operations

The Permittee shall demonstrate compliance with the product usage requirement in Condition 36.c by recording (within 10 days of the end of the month) the following:

- a. The amount (gallons), the VOC content (percent by weight), and the HAP content (percent by weight) of paint products (excluding cleanup solvents) used during the previous calendar month.
- b. Yearly totals of paint products used for the most recent 12-consecutive month period. These shall be kept by adding the totals from Condition 44.a above to the record of the previous 11 consecutive months.

#### 45. All Operations - Records

- a. The Permittee shall maintain on site a manufacturer's product information sheet (Safety Data Sheet or its equivalent) for each product used in the Permittee's process.
  - i. 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.
  - ii. 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.
- b. Using the information recorded in Conditions 41 through 44, 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:

- i. Total VOC and HAP emissions from each of the polyester resins and vinyl esters application operations:
  - (a) Manually applied (hand layup).
  - (b) Mechanized atomized application.
  - (c) Closed (infusion) molding
- ii. Total VOC and HAP emissions from gel coat application operations.
- iii. Total VOC and HAP emissions from painting operations (excluding cleanup solvents).
- iv. Total VOC and HAP emissions from Methacrylate adhesives and activators used containing those constituents.
- v. 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:
  - (a) Providing the Permittee is in compliance with Conditions 36.a.iii, 36.a.iv, & 36.a.vi, 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:
    - (i) For manual application (hand layup open-molding operations): 94 pounds of VOC and HAP emitted per ton of resin or ester processed.
    - (ii) For mechanized non-atomized application: 77 pounds of VOC and HAP emitted per ton of resin or ester processed.
  - (b) Providing the Permittee is in compliance with Conditions 36.a.iii, 36.a.vi, and 36.a.viii, 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.
  - (c) Providing the Permittee is in compliance with Condition 36.c, the Permittee may assume that all paint products applied had a combined VOC and HAP content of 6 pounds per gallon.
  - (d) Providing the Permittee is in compliance with Conditions 36.b.i & 36.b.ii, 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.
  - (e) The following emission factors (E.F) are approved for the purpose of this permit:
    - (i) Closed Molding Infusion Process, E.F.  $(lb_{emitted}/ton_{resin\ used}) = 0.03 * \%HAP_{resin} * 2000$
    - (ii) Gel Coat MMA Emission Rate, E.F.  $(lb_{emitted}/ton_{resin\ used}) = 0.75 * \%MMA * 2000$ .

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.

- c. 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:
  - i. That the solvent used in any fiberglass cleanup operation contains no VOC or HAP constituents (except as provided in Condition 37.c).
  - ii. That all resins used do not have a styrene or HAP content greater than the values allowed by Condition 36.a.vii.
  - iii. That all gel coats used do not have a HAP content greater than the values allowed by Condition 36.a.viii.
  - iv. That all paint products used contain no more than 6 pounds per gallon of VOC.
  - v. That all activators used contain no more than 20 percent dibutyl phthalate by weight.
  - vi. That all storage vessels containing VOC or HAP are completely covered except as provided in Condition 37.c.
  - vii. That covers on resin and gel coat mixers have no visible gaps except as provided in Condition 37.d.
  - viii. 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.
  - ix. That architectural coatings used on site are not photochemically reactive.
  - x. That spray painting and coating operations are conducted within an enclosure.
  - xi. 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 in Conditions 45.c.i through x above with discrepancies noted, results of any opacity tests conducted, and any corrective action taken.
- d. The Permittee shall maintain a record of the particulate removal efficiencies of all paint booth dry particulate filters used.

46-49. [Reserved]

## § 6: Reporting Requirements

### 50. Excess Emissions and Permit Deviations

[PCC 17.12.040.A.5.b & 17.12.040.E.3.d]

The Permittee shall report to the Control Officer any emissions in excess of the limits (as defined in 17.04.340, “Excess emissions”) established by this permit within 24 hours of the time the Permittee first learned of the excess emissions occurrence. The Permittee shall report other deviations from permit requirements within two working days of the time the Permittee first learned of the occurrence of the deviation.

*(See Condition 11 for detailed information on these two reports).*

### 51. Semiannual Summary Report of Required Monitoring

[PCC 17.12.040.A.5.a]

- a. The Permittee shall submit a semiannual summary of any required monitoring within Part B of this permit, as applicable, at least every six months. All instances of excess emissions and deviations from permit requirements as defined in Condition 11 shall be clearly identified in such reports. All reports must be certified by a responsible official of truth, accuracy, and completeness consistent with Condition 8 of this permit. These reports shall include the following monitoring and/or recordkeeping requirements:
  - i. The most recent complete 12-month rolling totals (in tons) of total VOC and HAP emissions resulting from the use of polyester resins and vinyl esters in each of the following categories:
    - (a) open molding application methods
    - (b) infusion process (closed molding applications)
  - ii. The most recent complete 12-month rolling totals (in tons) of total VOC and total HAP emissions from the use of gel coat applications.
  - iii. 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.
  - iv. 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.
  - v. The most recent complete 12-month rolling totals (in tons) of total VOC and total HAP emissions resulting from all paint products applied.
  - vi. The calculated 12-month weighted average organic HAP emission limits and weighted average organic HAP emission factors for all open molding operations (as applies if using one of the averaging options in 40 CFR 63.5810).
  - vi. A summary of the results of the monthly inspections conducted since the last semiannual report.
- b. The semiannual reports above 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 semiannual report due after the initial permit issuance may not cover a 6-month period. All instances of excess emissions and deviations from permit requirements as defined in Condition 11 of Part A shall be clearly identified in such reports.
- c. Periodic SSM Report (as applicable)

Should the Permittee be required to develop and maintain a startup, shutdown and malfunction plan in accordance with 40 CFR 63.6(e)(3), the Permittee shall include any such periodic SSM Reports in accordance with 40 CFR 63.10(d)(5) with the semiannual summary report required in Condition 51.a.

[40 CFR 63.10(d)(5)(i)]

## 52. Compliance Certification

- a. The Permittee shall submit semiannual compliance certifications to the Control Officer and the Administrator in accordance with Condition 7 of this permit. The compliance certification reports shall be due by January 31st and July 31st of each year covering the same periods identified in Condition 51.b. The first report due after permit issuance may not cover a 6-month period.
- b. The compliance certification shall include the following administrative information: [40 CFR 5910(c)]
  - i. The company name and address.
  - ii. A statement of truth accuracy and completeness pursuant to Condition 8 of this permit.
  - iii. Date of the report and beginning and ending dates of the reporting period.
- c. The compliance certification shall include the following information demonstrating continuous compliance with the standards in 40 CFR 63.5805:
  - i. The Permittee shall include a statement that all resins and gel coats meet the organic HAP limits in Conditions 36.a.vii, and 36.a.viii. If after any compliance report, the Permittee changes to a higher organic HAP content resin or gel coat, or increases the resin or gel coat HAP content, or changes to a higher emitting resin or gel coat application method, the Permittee shall demonstrate compliance with Conditions 36.a.vii, and 36.a.viii, begin collecting resin and gel coat usage records for a 12-month rolling average (in accordance with 63.5810.(a) through (c), if necessary), and or submit a facility change notification pursuant to Condition 16 of this permit. [40 CFR 5895(d) & 5900(a)(2)]
  - ii. A statement that there were no deviations during that reporting period if there were no deviations from any emission limitations (emissions limit and operating limit including the opacity limit and visibility standards) that apply and there were no deviations from the requirements for work practice standards in Condition 37.
  - iii. If a deviation from any emission limit, operating limit, or work practice standard has occurred (including periods of startup, shutdown, and malfunction) during the reporting period, the Permittee shall submit the following: [40 CFR 63.5910(a)]
    - (a) The total operating time of each affected source during the reporting period.
    - (b) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action plan.
  - iv. 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:
    - (a) 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:
      - (i) The exceedance of the threshold was due to circumstances that will not be repeated.
      - (ii) The average annual organic HAP emissions from the potentially affected operations for the last 3 years were below 100 tpy.

- (iii) Projected organic HAP emissions for the next calendar year are below 100 tpy, based on projected resin and gel coat use and the HAP emissions threshold, the Permittee shall report this exceedance as required in 40 CFR 63.5805(f).
- (b) 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).
- d. For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any standard in 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 requirements if the appropriate performance or compliance test or procedure had been performed. [40 CFR 60.11(g)]

53-59 [Reserved]

## § 7: Testing

[40 CFR 60.35f & 40 CFR 63.1960]

- 60. Should the Permittee be required to conduct performance tests, performance evaluations, capture efficiency testing, and other initial compliance demonstrations for a new source with add-on controls to reduce HAP emissions to comply with NESHAP Subpart WWWW, the Permittee must demonstrate compliance within 180 days of the compliance date in 40 CFR 63.5800 and/or 63.5840. The Permittee shall use the provisions in 40 CFR 63.5850 to conduct such testing.

## **ATTACHMENT 1**

### **APPLICABLE REGULATIONS**

Requirements Specifically Identified as Applicable:

#### **Code of Federal Regulations Title 40:**

Part 60 Appendix A	Test Methods
Part 63 Subpart A	National Emissions Standards for Hazardous Air Pollutants (NESHAP) General Provisions
Part 63, Subpart WWWW	National Emissions Standards for Hazardous Air Pollutants (NESHAP): Reinforced Plastics Composites Production

#### **Pima County Code, Title 17, Chapter 17.11 – General Provisions**

##### **Article I – Scope and Authority**

- 17.11.010 Statutory Authority.
- 17.11.020 Planning, Constructing, or Operating Without a Permit.

##### **Article II – General Provisions for Stationary Sources**

- 17.11.060 Permit display or posting.
- 17.11.080 Permit shield.
- 17.11.120 Material permit condition.
- 17.11.160 Test methods and procedures.
- 17.11.190 Permits Containing synthetic emission limitations and standards.
- 17.11.210 Performance tests.

#### **Pima County Code, Title 17, Chapter 17.12 – Individual Permits and Permit Revisions for Class I Permits**

##### **Article I – Application Processing and Procedures**

- 17.12.010 Permit application processing procedures for Class I Permits.
- 17.12.040 Permit Contents for Class I permits.

##### **Article II – Permit Revisions, Renewal, and Transfers for Class I Permits**

- 17.12.080 Compliance plan.
- 17.12.090 Facility changes allowed without permit revisions.
- 17.12.100 Administrative permit amendments.
- 17.12.110 Minor permit Amendments.
- 17.12.120 Significant permit revision.
- 17.12.130 Permit reopenings – revocation and reissuance – termination.
- 17.12.140 Permit renewal and expiration.

##### **Article III – Emissions for Class I Permits**

- 17.12.160 Annual emissions inventory questionnaire.
- 17.12.170 Excess emissions reporting requirements.
- 17.12.180 Affirmative defenses for excess emissions due to malfunctions, startup, and shutdown.

##### **Article V – Fees for Class I Permits**

- 17.12.220 Fees related to Class I permits.

#### **Pima County Code, Title 17, Chapter 17.16 – Emission Limiting Standards**

**Article I – General Provisions**

- 17.16.010 Local rules and standards – Applicability of more than one standard.
- 17.16.020 Noncompliance with applicable standards.
- 17.16.030 Odor limiting standards.

**Article II – Visible Emission Standards**

- 17.16.040 Standards and applicability (includes NESHAP).
- 17.16.050 Visibility limiting standard.

**Article IV – New and Existing Stationary Source Performance Standards**

- 17.16.130 Applicability.
- 17.16.230 Standards of performance for storage vessels for petroleum liquids.
- 17.16.400 Organic solvents and other organic materials.
- 17.16.430 Standards of performance for unclassified sources.

**Pima County Code Title 17, Chapter 17.20 – Emissions Source Testing and Monitoring**

- 17.20.010 Source sampling, monitoring and testing.
- 17.20.040 Concealment of emissions.

**Pima County Code Title 17, Chapter 17.24 – Emissions Source Recordkeeping and Reporting**

- 17.24.020 Recordkeeping for compliance determination.
- 17.24.030 Recordkeeping for emission inventories
- 17.24.040 Reporting for compliance evaluations
- 17.24.050 Reporting as a permit requirement
- 17.24.060 Reporting for emission inventories

**Article IV – Penalty for noncompliance**

**Pima County Code Title 17, Chapter 17.28 – Violations and Conditional Orders**

- Article I – Violations** (inclusive)
- Article II – Conditional Orders** (inclusive)
- Article III – Circumvention** (inclusive)

**Pima County State Implementation Plan (SIP):**

- SIP Regulations: 10, 11, 20-25, 33, 34, 50, 61-63, 70, 72
- SIP Rules: 101-113, 201-215, 222, 224-226, 233, 241, 261, 301, 302, 314, 315, 316, 318, 321-344, 403, 501-506, 611, 612, 621-624, 631, 711-714, 721, 722

**ATTACHMENT 2: EQUIPMENT LIST**

Equipment for which emissions are allowed by this permit are as follows:

**Table 1 – S.R. Smith, LLC – Tucson Facility Equipment and Operations**

Source ID Number	Equipment/ Operation Description	Manufacturer (MFR)	Model	Serial Number/ Unique ID	Maximum Rated Capacity	Operating Limitations	Fuels Used	Date of MFR	Date Installed
<b>01 – 30501</b>	<b>Diving Board Hand Layup MFG</b>					1,892,222 lbs of resin or gel coat products			
02 – A	Resin Impregnator	Magnum-Vemus		-	-	-	-	-	-
03 – B	Cure Oven	Industrial Process Equipment	Russ Rumsey	1428	800,000 BTU	-	-	1998	-
04 – C	Wood Shop & Process Areas Dust Collector Systems	Donaldson	-	-	26,000 cfm	-	-	-	-
05 – D	Router 3 Dust Collector	EnviroSystems	-		12,000 cfm	-	-	-	-
<b>06 – 30506</b>	<b>Infusion MFG Closed Molding: Area 1</b>								
07 – A (Future Use)	Vacuum Thermal Former (Future Equipment)	TBD	TBD	TBD	TBD	TBD	N/A	TBD	TBD
08 – B	Spray Booth	Bleeker Brothers	EP-8-7	- A1539	30” Dia. Exhaust Duct	-	N/A	2005	-
09 – C	Router 1 Dust Collector	Ice Box	-	-	12,000 cfm	-	-	-	-
<b>10 – 30508</b>	<b>Infusion MFG Closed Molding: Area 2</b>								
11 – A	Eastman Glass Cutter	Chicago Blower Corp.	25 hp	2364704	25 hp	-	-	Unknown-	-
12 – B	Spray Booth	Westing	-	- A1540	24” Dia. Exhaust Duct	-	N/A	-	-
13 – C	Router 2 Dust Collector	EnviroSystems	-		12,000 cfm	-	-	-	-
14 – D (Future Use)	Resin Storage Tank (8000) Gallon (Future Equipment)	TBD	TBD	TBD	TBD	TBD	-	-	-

**Table 1 – S.R. Smith, LLC – Tucson Facility Equipment and Operations (Continued)**

Source Equipment ID	Equipment/ Operation/ Description/	Manufacturer (MFR)	Model	Serial Number/ Unique ID	Maximum Rated Capacity	Operating Limitations	Fuels Used	Date of MFR	Date Installed
<b>15 – 30509</b>	<b>Fiberglass Diving Bases MFG</b>								
16 – A A1541	Spray Booth 1	Binks	30 – 4303	-	34” Dia. Exhaust Duct	-	-	-	-
17 – B A1541	Spray Booth 2	Binks	30 – 4303	-	34” Dia. Exhaust Duct	-	-	-	-
18 – C A1541	Spray Booth 3	Binks	30 – 4303	-	34” Dia. Exhaust Duct	-	-	-	-
19 – D	Router 4 Dust Collector	Unknown	Unknown	Unknown	6000 cfm	-	-	-	-
<b>20 – 30510</b>	<b>Fiberglass Hand Lay-Up MFG (Reinforcements for Infusion Areas)</b>								
<b>21 – 305011</b>	<b>Aluminum Diving Boards MFG</b>								
22 – A	Spray Booth	Pro Clean	Devilbiss Fan	911468	26,000 cfm 40” Dia Exhaust Duc	-	-	1998	-
<b>23</b>	<b>Other MFG</b>								

Insignificant Activities: (See TSD – Table 2 for information on insignificant activities).

**ATTACHMENT 3: SUMMARY OF PERMIT MONITORING AND RECORDKEEPING**

<b>Section.Condition</b>	<b>Description</b>
<b>Part A: General Conditions</b>	
§ <u>A.4</u>	Permit Posting
§ <u>A.6</u>	Annual Emissions Inventory Questionnaire
§ <u>A.7 &amp; 8</u>	Compliance Certification & Truth Accuracy and Completeness
§ <u>A.11</u>	Excess Emissions, Permit Deviations, and Emergency Reporting
§ <u>A.12 &amp; 13</u>	General Recordkeeping and Reporting Requirements
§ <u>A.15 &amp; 16</u>	Permit Amendment, Revision, and Facility Changes Allowed Without Revisions
§ <u>A.17</u>	Testing Notifications and Reports (if applicable)
§ <u>A.22</u>	Requirement to Obtain Activity Permits
§ <u>A.23</u>	Stratospheric Ozone Depleting Substances

<b>Section.Condition</b>	<b>Description</b>
<b>Part B: Specific Conditions – § 5: Monitoring and Recordkeeping Requirements</b>	
§ <u>5.41</u>	RPC Production
§ <u>5.42</u>	RPC Work Practice Standards
§ <u>5.43</u>	Adhesives & Activators
§ <u>5.44</u>	Surface Coating Operations
§ <u>5.45</u>	All Operations

<b>Section.Condition</b>	<b>Description</b>
<b>Part B: Specific Conditions – § 6: Reporting Requirements</b> (See Also <u>A.6</u> , <u>A.7 &amp; 8</u> , <u>A.11</u> , & <u>A.13</u> for General Reporting Requirements)	
§ <u>6.51</u>	Semmiannual Summary Report of Required Monitoring
§ <u>6.52</u>	Compliance Certification Report