AZ ENVIRONMENTAL CONTAINER - ELOY

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1. Introduction

This is a permit renewal for a facility that manufactures fiberglass swimming pools and spas, which is owned and operated by Arizona Environmental Container Corporation, an Arizona corporation. The facility is located at 850 N. Davidson Boulevard, Eloy, Arizona, upon parcels also identified by Pinal County Assessor numbers 408-02-008G-8 and 408-02-026. The SIC Code is 3089. The facility is situated in an area classified as "attainment" for all pollutants.

The principal operations at the facility which consists of 8 pool production bays are: spray layup, or build-up, fiberglass swimming pool structures and various finishing operations. An adjacent building contains 2 more bays for mold construction and repair. A complete list of equipment from which emissions are allowed by this permit is given in Section 11. of this permit.

In the manufacturing operation, a gel coat is applied to a waxed mold with a gel coat spray gun system. The spray gun system mixes the gel coat with a catalyst as the material is applied. The gel coat typically contains a of mixture styrene and methylmethacrylate ("MMA"). This gel coat surface will become the pool surface. A fiberglass mat is manually applied by hand over the gel coated mold surface, and resin is applied to the fiber glass mat with a resin spray gun system.

Due to the operating environment for the permittee's products, the resin utilized qualifies as "corrosion resistant." While corrosion resistant resin offers superior longevity when exposed to sunlight and the various chemicals utilized in a swimming pool environment, corrosion resistant resin also produces relatively higher emissions of styrene than do other resins.

As more fully explained in the permit and the supporting technical analysis, the MACT determination under this permit requires Permittee to use a resin delivery system known in the industry as "fluid impingement technology" ("FIT") or, since FIT is a trademark name, an equivalent technology from another manufacturer.

After sufficient layers of resin coated mat are applied to the mold, hand rollers are used to force the resin into the mat, eliminating air bubbles and dry spots and tightly laminating the composite structure. Additional layers of resin coated mat are applied as needed to achieve the required thickness, determined by the structural requirements for a specific pool. The resin infused material is allowed to polymerize and harden. Miscellaneous styrene-containing putties and fillers may be used to touch up the pool either in the laminating area or during final assembly.

After the final coat or resin has formed a hardened coat, the mold and pool assembly is moved outside to complete the curing process.

When fully solidified, compressed air is fed between the pool and the mold to remove the pool from the mold. The mold may require minor cleaning or repair ("mold care") and a mold release agent is applied to facilitate removal of the next built-up part from the mold. The pool edges are trimmed by hand powered tools equipped with collectors; the trimmed material is discarded. The trimming operation results in large fragments and particles too large to become airborne and result in fugitive emissions. Grinding of surface imperfections will be performed by hand tools equipped with vacuum-bag collectors. Smaller particulates generated both inside and outside the building will be controlled by the vacuum bag collectors in the hand tools, by portable "shop-vac" vacuum collectors as needed and normal "good housekeeping" procedures. Holes are cut as needed in the pool to accommodate drain and filter lines and other items installed in the final assembly process. After passing a final quality control inspection, the pool is prepared for shipping.

Eight separate bays allow for independent manufacturing operations in each separate bay. Production may occur on a continuous basis, 24 hours per day, 7 days per week, 52 weeks per year, which equals 8760 hours per year. The facility has four exhaust fan systems, each servicing a "block" of two layup bays.

The principal emissions from the facility will include volatile organic compounds generally, and styrene and MMA specifically. Solvents, namely acetone or an aqueous compound, are used to flush and clean hose lines and equipment. Emissions of particulate matter are incidental in nature. Although natural-gas fired heating units will produce nitrogen oxides, carbon monoxide and sulfur dioxide, none of those emissions trigger meaningful regulatory consequence.

Generally, emissions from this facility only trigger one principal control requirement. Since Clean Air Act ("CAA") §112 defines styrene as a "hazardous air pollutant" or "HAP," and this facility constitutes a "major source" that requires a permit pursuant to Title V of the CAA Amendments of 1990, CAA §112(g), 40 CFR §63.40 *et seq.* and Code §7-1-040 all require a permit-requirement that the facility will meet the "maximum achievable technology" ("MACT") standard for such a facility. At the time this facility was permitted, PCAQCD developed a case-by-case MACT standard. On April 21, 2003, 40 CFR 63 Subpart WWWW, the Reinforced Plastics MACT was promulgated.

To assure that the bulk of emissions are actually captured by the dispersion system, the permit requires that the pool-product be retained in the production bay until the resin has "skinned" over, and that the exhaust system continue to operate for a fixed period after the resin application has concluded.

Additional information on this permit, including emissions, can be found in the Technical Support Document (“TSD”) for the appropriate revision or the original TSD.

As an assistance, and not as a mandate, Appendix A to the permit sets forth a suggested semi-annual reporting form.

2. Listing of *(Federally Enforceable)* Applicable Requirements *[Mandated by 40 CFR §70.5(c)(4)]*

A. Those specific provisions of the Pinal-Gila Counties Air Quality Control District ("PGAQCD") Regulations, as adopted by the Pinal County Board of Supervisors on March 31, 1975, and approved by the Administrator as elements of the Arizona State Implementation Plan ("SIP") at 43 FR 50531, 50532 (11/15/78), and specifically the following rules:

7-3-1.3	Emission Standards - Particulates - Open Burning
7-3-1.7.A	Particulate Emissions - Fuel Burning Equipment
7-3-1.7.C	Particulate Emissions - Fuel Burning Equipment
7-3-1.7.D	Particulate Emissions - Fuel Burning Equipment
7-3-1.7.E	Particulate Emissions - Fuel Burning Equipment

B. Those specific provisions of the Pinal-Gila Counties Air Quality Control District Regulations, as last amended by the Pinal County Board of Supervisors on June 16, 1980, and approved by the Administrator as elements of the Arizona SIP at 47 FR 15579 (4/12/82), specifically, the following rules:

7-3-1.1	Visible Emissions; General
7-3-1.7.F	Fuel Burning Equipment

C. Those specific provisions of the Pinal County Air Quality Control District Regulations, as last amended by the Pinal County Board of Supervisors on October 27, 2004, and approved by the Administrator as elements of the Arizona SIP at 75 FR 17307, specifically, the following rules:

4-2-040	(Reasonable Precautions) Standards

D. National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR Part 63, Subpart A [40 CFR §§63.1 - 63.15] and Subpart B [40 CFR §§63.40 - 60.44 (1998)].

E. National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW [40 CFR §§63.5780-5935].

3. Compliance Certification

A. Compliance Plan [***Mandated by*** 40 CFR §70.(5)(c)(8)]

Insofar as the Permittee is currently in compliance, the compliance plan consists of continued adherence to the requirements of this permit and those requirements set forth in applicable regulations and statutes.

B. Compliance Schedule [***Mandated by*** 40 CFR §§ 70.5(c)(8), 70.6(c)(3)]

Insofar as the Permittee is currently in compliance, no compliance schedule to attain compliance is required.

4. Authority to Construct ***[Code §§3-1-010, 3-1-040 (as amended 10/12/95) approved as a SIP Element at 61 FR 15717 (4/9/96)]***

Emissions from this facility, specifically emissions from the equipment described in "Equipment Schedule" section below, and the operating configuration more fully described in the application for permit, already fall subject to the independent Federally enforceable limitations identified elsewhere in this permit. Therefore, based on the regulations in effect upon the date of issuance of this permit and a finding that allowable emissions from the equipment described in the Equipment Schedule will neither cause nor contribute to a violation of any ambient air quality standard even without any additional limitations, and a further finding that this does not constitute a "major emitting source" within the meaning of Code §3-3-203, this permit constitutes authority to construct and operate such equipment.

5. Emission Limitations [*Mandated by* 40 CFR §70.6(a)(1)]

A. Allowable Emissions (Code § 3-1-081.A.2.)

Permittee is authorized to discharge or cause to discharge into the atmosphere those emissions of air contaminants as set forth below.

B. HAP Emission Controls (40 CFR §63.40 et seq., 40 CFR §63.5780 et seq., Code §7-1-040, Code §3-1-084.)

1. Manufactured Product Limitation

The facility authorized by this permit may be utilized only for the manufacture of swimming pool, spa structures, and similar products designed for use in an outdoor environment.

2. New Building Limitation

Permittee shall use the 2 bays in the new building located in Assessors Parcel # 408-02-026 for construction of molds and mold repair. No production of swimming pools, spa structures or similar products shall be conducted in this building.

3. Resin/Gel coat Delivery System Requirements

Permittee shall utilize only resin & gel coat delivery systems utilizing "fluid impingement technology" or an equivalent technology to produce a non-atomized stream of resin to be applied to the pool structure.

4. Consumable Product Formulation and Use Requirements

Permittee shall comply with the organic HAP limits of Table 3 (listed below) of Subpart WWWW using any of the following options:

a. Meet the individual organic HAP emission limits from Table 3 or Table 5 of Subpart WWWW. If using this option, Permittee shall follow the procedures in §63.5810(a).

b. Demonstrate that, on the average, Permittee meets the individual organic HAP emission limits for each combination of operation type and resin application method or gel coat type . If using this option, Permittee shall follow the procedures in §63.5810(b).

c. Demonstrate compliance with a weighted average emission limit. If using this option, Permittee shall follow the procedures in §63.5810(c).

d. Meet the organic HAP emissions limit for one operation type, and use the same resin(s) for all operations of that resin type. This option is limited to resins of the

same type. If using this option, Permittee shall follow the procedures in §63.5810(d)).

Table 7 from Subpart WWWW, and included below, presents the possible combinations based on a facility selecting the application process that results in the highest allowable organic HAP content resin. If the resin organic HAP content is below the applicable value shown in Table 7 to this subpart, the resin is in compliance.

Permittee may switch between the compliance options listed in subsection 4 above. When switching to an option based on a 12-month rolling average, Permittee shall base the average on the previous 12 months of data calculated using the compliance option currently used unless Permittee is using an option that did not require maintaining records of resin and gel coat use. In that case, Permittee shall immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

Table 3 (combined with Table 7) to Subpart WWWW of Part 63. Organic HAP Emissions Limit for Existing Open Molding Sources.

If your operation type is...	And you use...	Your organic HAP emissions limit is...	For the same resins in different operations: The highest resin percent organic HAP content, or weighted average weight percent organic HAP content is...
Open Molding - corrosion-resistant and/or high strength (CR/HS)[1]	Mechanical resin application	1132 lb/ton	46.4 with nonatomized application
Open Molding - non-CR/HS	Mechanical resin application	88 lb/ton	38.5 with nonatomized application
Open Molding - tooling	Mechanical resin application	254 lb/ton	91.4 with nonatomized application
Open Molding - gel coat	Tooling gel coating	440 lb/ton	
	White/off white gel coat	267 lb/ton	
	All other pigmented gel coat	377 lb/ton	
	CR/HS or high performance gel coat[2]	605 lb/ton	
	Clear production gel coat	522 lb/ton	

5. Building Enclosure Required

Production operations shall occur within a normally closed building envelope. Personnel

1 Corrosion-resistant resins and high strength resins as defined in 40 CFR 60§5935

2 Corrosion-resistant, high strength and high performance gel coats as defined in 40 CFR 60§5935

doors through the building envelope shall be equipped with automatic closers, and shall normally remain closed. Other exterior doors shall normally be kept closed, except as required for production or shipping purposes.

6. Exhaust System Required

Permittee shall install and operate in the main building an entire-building exhaust system, consisting of four separate fan systems, respectively each rated at 21,000 cfm and evacuating 2 layup bays each. The fan systems shall each exhaust through a stack with an un-obstructed straight vertical flow path, with a discharge elevation of not less than 33 ft. above ground level. Each fan system exhaust outlet shall maintain a minimum average velocity of 27 feet/second.

7. Fan System Operation

a. Permittee shall operate the relevant corresponding fan system during resin/gel coating operations.

b. Permittee shall retain the pool product in the production bay with the corresponding exhaust fan operating at least until the exposed surface is solid to the touch.

c. To purge the building of styrene/MMA emissions, Permittee shall continue to operate the affected bay-block fan system for at least one and one-half hours after resin/gel coating operations within that specific bay-block have ceased.

8. Volatile Product Storage

a. Resin, gel coat and catalyst storage containers shall be located within the production building enclosure. Other than a conventional breathing vent, such containers shall be kept closed and covered.

b. Bulk resin shall either be stored in closed commercial totes, or in a bulk storage-and-delivery system having an aggregate capacity not greater than 30,000 gallons.

c. Permittee shall conduct a daily inspection of resin, gel coat and catalyst containers, to assure that they remain closed. Permittee shall maintain a daily record of those inspections.

9. Cleanup Solvents

a. Permittee shall not use flushing or cleanup solvents that contain hazardous air pollutants, except to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.

b. Solvents used to flush either the spray gun systems, or the product delivery systems used to deliver styrene, MMA or coating products to the spray gun systems, shall be fed by a hose directly into a covered drum for recycling or disposal.

C. Organic Material Emissions Limitations (Code 3-1-083)

1. Labeling

All organic solvents or materials containing organic solvents shall be labeled properly, which within this context means that all products must be stored in labeled containers, and no products may be in mis-labeled containers.

2. Limitation on Other Emissions

Permittee shall limit cumulative emissions from the use of mold cleaners of any single

regulated air pollutant not listed in this permit to less than the de minimis amount of 5.5 pounds per day. (Code §1-3-140.37.) For purposes of complying with this limitation, Permittee shall calculate daily emissions as an average over a calendar month.

D. Particulate Emissions Limitations

1. Opacity Limits

a. SIP Limitation - Federally Enforceable Standard ***[Currently federally enforceable pursuant to PGAQCD Reg. 7-3-1.1 (6/16/80) approved as a SIP element at 47 FR 15579 (4/12/82)]*** (Code §§2-8-300. and 4-2-040.)

The opacity of any plume or effluent shall not be greater than 40 percent as determined by Reference Method 9 in the Arizona Testing Manual (ADEQ, 1992). Nothing in this limitation shall be interpreted to prevent the discharge or emission of uncontaminated aqueous steam, or uncombined water vapor, to the open air.

b. Locally Enforceable Limitation (Code §2-8-300)

The opacity of any plume or effluent from any point source not subject to a New Source Performance Standard adopted under Chapter 6 of the Code, and not subject to an opacity standard in Chapter 5 of the Code, shall not be greater than 20% as determined in Method 9 in 40 CFR Part 60, Appendix A. Affected facilities include all particulate matter emitting operations at this facility, including but not limited to, natural gas burning and grinding and trimming operations.

2. Particulate Matter Reasonable Precautions ***[Currently federally enforceable pursuant to PCAQCD Reg. 4-2-040 (4/27/04) approved as a SIP element at 75 FR 17307]***

a. Permittee shall not cause, suffer, allow, or permit a building or its appurtenances, subdivision site, driveway, parking area, vacant lot or sales lot, or an urban or suburban open area to be constructed, used, altered, repaired, demolished, cleared, or leveled, or the earth to be moved or excavated, or fill dirt to be deposited, without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.

b. Permittee shall not cause, suffer, allow, or permit a vacant lot, or an urban or suburban open area, to be driven over or used by motor vehicles, such as but not limited to all-terrain vehicles, trucks, cars, cycles, bikes, or buggies, without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.

c. Permittee shall not disturb or remove soil or natural cover from any area without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.

d. Permittee shall not crush, screen, handle or convey materials or cause, suffer, allow or permit material to be stacked, piled or otherwise stored without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.

e. Stacking and reclaiming machinery utilized at storage piles shall be operated at all times with a minimum fall of material and in such a manner, or with the use of spray bars and wetting agents, as to prevent excessive amounts of particulate matter from becoming airborne. Other reasonable precautions shall be taken, as necessary, to effectively prevent fugitive dust from becoming airborne.

f. Permittee shall not cause, suffer, allow or permit transportation of materials likely to give rise to fugitive dust without taking reasonable precautions to prevent fugitive dust from becoming airborne. Earth and other material that is tracked out

or transported by trucking and earth moving equipment on paved streets shall be removed by the party or person responsible for such deposits.

3. Control Equipment - Spray Booth Particulate ***[PGAQCD Reg. 7-3-3.4.D. (6/16/80) approved as a SIP element at 47 FR 15579 (4/12/82)]*** (Code §3-1-081.)

Spraying shall be done in enclosed booths designed to control overspray from the spray booth at an efficiency of ninety-six (96) percent or higher. The exhaust vent for each production bay shall be equipped with a functional particulate filter.

4. Control Equipment - Grinding & Trimming Operations ***[PGAQCD Reg. 7-3-1.1 (6/16/80) approved as a SIP element at 47 FR 15579 (4/12/82)]*** (Code §§2-8-300. and 4-2-040.)

Surface grinding operations shall be conducted with hand tools equipped with vacuum-bag collectors, such that the opacity of any plume or effluent shall not exceed the standards in subsection D.1 above.

E. Fuel Burning Equipment

1. Fuel Use Limitations (Code §3-1-081)

The Permittee is allowed to burn only natural gas in the comfort heating or air make-up units.

2. Combustion-rate Limitations (Code §3-1-084)

Permittee shall limit aggregate heat input capacity of all natural-gas burning equipment to 10 million Btu per hour.

F. General Maintenance Obligation (Code §3-1-081)

At all times, including periods of start-up, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate the permitted facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.

G. Additional Applicable Limitations

1. Asbestos NESHAP Compliance ***[40 CFR Part 61, Subpart M]*** (Code §§7-1-030, 7-1-060)

Permittee shall comply with Code §§7-1-030.A. and 7-1-060 and 40 CFR Part 61, Subpart M, when conducting any renovation or demolition activities at the facility.

2. Stratospheric Ozone and Climate Protection ***[40 CFR Part 82 Subpart F]*** (Code §§1-3-140.15, 1-3-140.58.k)

The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction.

3. Part 63 General Provisions ***[40 CFR Part 63, 40 CFR §63.5925]***

Permittee shall comply with Table 15 of Subpart WWWW, which contains the part of the General Provisions that are applicable to this facility.

6. Compliance Demonstration [*Mandated by* 40 CFR §70.6(c)]

A. Monitoring and Testing [***Mandated by*** 40 CFR §70.6(a)(3), and 40 CFR §63.5895(c)&(d)]

1. Non-instrumental Monitoring, HAPs & VOCS

a. Permittee shall maintain records of each of the following in a logbook at the facility.

i. Manufacturer, type, and quantity of paints, gel coats, resins, and solvents received and used,

ii. vendor,

iii. dates received,

iv. vendor's invoice numbers, and

v. a copy of the MSDS for each paint, gel coat, resin, or solvent received or used.

vi. For each gel coat and resin, include organic HAP content and operation where the resin is used.

vii. For each “Corrosion-Resistant/High-Strength/High-Performance” gel coat and resin, include supporting evidence that such products meet the definitions in 40 CFR §63.5935.

Resin use records may be based on purchase records if Permittee can reasonably estimate how the resin is applied.

b. If Permittee initially demonstrates that all resins and gel coats individually meet the applicable organic HAP emissions limits, or organic HAP content limits, then resin and gel coat use records are not required. However, Permittee shall include a statement in each compliance report that all resins and gel coats still meet the organic HAP limits for compliant resins and gel coats shown in Table 3 of §5.B. If after this initial demonstration, Permittee changes to a higher organic HAP resin or gel coat, or increases the resin or gel coat organic HAP content, or changes to a higher emitting resin or gel coat application method, then Permittee shall either again demonstrate that all resins and gel coats still meet the applicable organic HAP emissions limits, or begin collecting resin and gel coat use records and calculate compliance on a 12-month rolling average.

c. Permittee shall demonstrate compliance with organic HAP emissions limits by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emission limit listed in Table 3 of this permit, on a 12-month rolling average, or by including in each compliance report a statement that all resins and gel coats meet the appropriate organic HAP emissions limits, as discussed in the previous subsection.

d. Permittee shall demonstrate compliance with organic HAP content limits in the Table in this permit by maintaining an average organic HAP content value less than or equal to the appropriate organic HAP contents listed in the Table, on a 12-month rolling average, or by including in each compliance report a statement that all resins and gel coats individually meet the appropriate HAP content limits, as discussed in subsection b. above.

2. Opacity monitoring [Code §3-3-260.]

a. Stack Emissions

Initially, within sixty days of facility startup, and thereafter on at least a semi-annual basis, Permittee shall conduct a visual opacity screen performed on each process and fuel-burning exhaust stack. If visible emission are observed, Permittee shall have a full Method 9 opacity test performed by a certified opacity observer, and shall provide a copy of the resulting report to the District within 10 days. Submission of such a report shall constitute cause to reopen this permit to add additional testing and/or control requirements.

b. Open-area Fugitive Emissions

On at least a semi-annual basis, Permittee shall conduct a visual opacity screen performed on the open areas of the facility. If visible emission are observed, Permittee shall have a full Method 9 opacity test performed by a certified opacity observer, and shall provide a copy of the resulting report to the District within 10 days. Submission of such a report shall constitute cause to reopen this permit to add additional testing and/or control requirements.

3. Parametric Monitoring - Fan System Operation

Permittee shall maintain a log for each production bay and affected fan system, and make a daily record of:

a. whether the bay was used for production;

b. the time when resin or gel coating operations in that block and bay ceased for the day;

c. the time when the exhaust fan was shut off;

d. whether the fan did operate for at least 1-1/2 hours after the conclusion of the last of the resin or gel coating operations in either of the bays serviced by that fan system.

4. Periodic Monitoring - Storage System Inspections

Permittee shall maintain a log, showing whether each storage vessel for resin, gel coat or coating products was closed and covered at the end of the production day.

5. Periodic Monitoring - Other Emissions - Mold Cleaner Emissions

Permittee shall maintain a log, showing whether the daily use of mold cleaners, assuming 100% volatilization, averaged over a calendar month, exceeded 5.5 pounds per day.

6. Periodic Monitoring - Particulate Emission Control - Overspray Control

Permittee shall conduct weekly inspections of exhaust inlet filters, to verify that they are not clogged with particulate matter. Permittee shall maintain a log, showing whether the weekly inspections of exhaust inlet filters have been conducted, and whether filters were replaced.

B. MACT Compliance Verification [40 CFR §63.5810]

Within 30 days after the end of each month, Permittee shall complete calculations verifying compliance with the MACT standards for open molding. Calculations shall be done in accordance with 40 CFR §63.5810. Calculations shall also show monthly totals for VOC, styrene and MMA emissions.

C. Recordkeeping [***Mandated by*** 40 CFR §70.6(a)(3), §§5915(a), (c), (d), §5920(a)]

In addition to the specific record-keeping requirements above, Permittee shall:

1. Maintain at the source a record of all measurements, including continuous monitoring-system-, monitoring-device-, and performance- testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required pursuant to any federally enforceable provision of this permit, recorded in a permanent form suitable for inspection. The file shall be retained for at least five years following the date of such measurements, maintenance, reports and records.

2. Maintain records of the occurrence and duration of any start-up, shutdown or malfunction in the operation of the permitted facility or any air pollution control equipment.

3. Maintain records of natural gas purchased.

4. Keep a certified statement that they are in compliance with the work practice standards in Table 4 of Subpart WWWW of 40 CFR 63.

5. Keep a copy of each notification and report that was submitted to comply with Subpart WWWW, including all documentation supporting any Initial Notification or Notification of Compliance Status submitted.

6. Keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents.

7. Maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection.

D. Regular Compliance Reporting [***Mandated by*** 40 CFR §§70.6(a)(3), 70.6(c)(4), §63.5910(b),(c),(i)]

In order to demonstrate compliance with the provisions of this permit, Permittee shall submit a report to the District within 30 days of the end of each calendar half containing the following information:

1. Company name and address.

2. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

3. Date of the report and beginning and ending dates of the reporting period.

4. If there are no deviations from any organic HAP emissions limitations, or deviations from the work practice standards, a statement to that effect.

5. Where multiple compliance options are available, state if compliance options have been changed since the last compliance report.

6. Volume of each resin, gel coat, paint, adhesive, and solvent used during the period (§6.A.1), including organic HAP content of each resin and gel coat, and

7. Total semi-annual emissions of VOC, styrene and MMA emitted during the period (§6.B.).

8. Total volume of natural gas purchased during the period (§6.C.3).

9. Compliance status of record keeping requirements (§6.C).

10. A statement that all resins and gel coats meet the appropriate organic HAP emissions limit, as required by §6.A.4.c.

11. A statement that all resins and gel coats individually meet the appropriate organic HAP content limits, as required by §6.A.4.d.

Appendix A of this permit is a form which may be used for this report.

E. NESHAP Deviation Reporting [40 CFR §§63.5900(d), 5910(5)(d), 5910(g)]

Permittee shall report each deviation from each standard of the Table in §5.B.4 in accordance to the following:

For each deviation from an organic HAP emission limit and for each deviation from the requirements for work practice standards, Permittee shall include the following information in the semi-annual report required by the previous section:

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

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

F. Regular Compliance/Compliance Progress Certification [***Mandated by*** 40 CFR §§70.5(c)(8), 70.5(c)(9), 70.6(c)(4), 70.6(c)(5)]

Permittee shall annually submit to the Control Officer, and also to the Administrator of US EPA, a certification of compliance with the provisions of this permit. The certification shall:

1. Be signed by a responsible official, namely the president, secretary, treasurer, vice-president of the corporation, the director of manufacturing, or such other person as may be approved by the Control Officer as an administrative amendment to this permit;

2. Identify each term or condition of the permit that is the basis of the certification;

3. Verify the compliance status with respect to each such term or condition;

4. Verify whether compliance with respect to each such term or condition has been continuous or intermittent;

5. Identify the permit provision, or other, compliance mechanism upon which the certification is based; and

6. Be postmarked within thirty (30) days of the start of each calendar year.

7. Other Reporting Obligations

A. Deviation Reporting Requirement (Code §3-1-083.A.3.b.) ***[Mandated by 40 CFR §§70.6(a)(3)(iii)(B), 70.6(g)]***

Permittee shall report any deviation from the requirements of this permit along with the probable cause for such deviation, and any corrective actions or preventative measures taken to the District within fifteen days of the deviation unless earlier notification is required by the provisions of Section 9.P. of this permit.

B. Annual emissions inventory **[*Mandated by* 40 CFR §§70.6(a)(7), 70.9]** [Code §§3-1-103, 3-7-590.C.1.]

Permittee shall complete and submit to the District an annual emissions inventory, disclosing actual emissions for the preceding calendar year. The inventory shall reflect actual emissions of all pollutants regulated under this permit. The submittal shall be made on a form provided by the District. The inventory is due by the latter of March 31, or ninety (90) days after the form is furnished by the District.

8. Fee Payment [*Mandated by* 40 CFR §§70.6(a)(7), 70.9]

As an essential term of this permit, an annual permit fee shall be assessed by the District and paid by Permittee in accord with the provisions of Code Chapter 3, Article 7 generally, and Code §3-1-081.A.9. specifically. The annual permit fee shall be due on or before the anniversary date of the issuance of an individual permit, or formal grant of approval to operate under a general permit. the District will notify the Permittee of the amount to be due, as well as the specific date on which the fee is due.

9. General Conditions

A. Term [***Mandated by*** 40 CFR §70.6(a)(2)] (Code §3-1-089)

This permit shall have a term of five (5) years, measured from the date of issuance.

B. Basic Obligation [***Mandated by*** 40 CFR §§70.4(b)(15), 70.6(a)(6(i), 70.6(a)(6)(ii), 70.7.b] (Code §3-1-081.)

1. The owner or operator ("Permittee") of the facilities shall operate them in compliance with all conditions of this permit, the Pinal County Air Quality Control District ("the District") Code of Regulations ("Code"), and consistent with all State and Federal laws, statutes, and codes relating to air quality that apply to these facilities. Any permit noncompliance is grounds for enforcement action; for a permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application and may additionally constitute a violation of the Clean Air Act (1990).

2. All equipment, facilities, and systems used to achieve compliance with the terms and conditions of this permit shall at all times be maintained and operated in good working order.

C. Duty to Supplement Application ***[Mandated by 40 CFR §§70.5(b), 70.6(a)(6)(v)]*** (Code §§3-1-050.H, 3-1-081.A.8.e, 3-1-110)

Even after the issuance of this permit, a Permittee, who as an applicant who failed to include all relevant facts, or who submitted incorrect information in an application, shall, upon becoming award of such failure or incorrect submittal, promptly submit a supplement to the application, correcting such failure or incorrect submittal. In addition, Permittee shall furnish to the District within thirty days any information that the Control Officer may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit and/or the Code.

D. Right to Enter [***Mandated by*** 40 CFR §70.6(c)(2)] (Code § 3-1-132)
Authorized representatives of the District shall, upon presentation of proper credentials, be allowed:

1. to enter upon the premises where the source is located or in which any records are required to be kept under the terms and conditions of this permit;

2. to inspect any equipment, operation, or method required in this permit; and

3. to sample emissions from the source.

E. Transfer of Ownership [***Mandated by*** 40 CFR §70.7(d)(4)]

This permit may be transferred from one person to another by notifying the District at least 30 days in advance of the transfer. The notice shall contain all the information and items required by Code § 3-1-090. The transfer may take place if not denied by the District within 10 days of the receipt of the transfer notification.

F. Posting of Permit (Code §3-1-100)

Permittee shall firmly affix the permit, an approved facsimile of the permit, or other approved identification bearing the permit number, upon such building, structure, facility or installation for which the permit was issued. In the event that such building, structure, facility or installation is so constructed or operated that the permit cannot be so placed, the permit shall be mounted so as to be clearly visible in an accessible place within a reasonable distance of the equipment or maintained readily available at all times on the operating premises.

G. Permit Revocation for Cause [***Mandated by*** 40 CFR §70.6(a)(6)(iii)] (Code §3-1-140)

The Director of the District ("Director") may issue a notice of intent to revoke this permit for cause pursuant to Code §3-1-140, which cause shall include occurrence of any of the following:
1. The Director has reasonable cause to believe that the permit was obtained by fraud or material misrepresentation;
2. Permittee failed to disclose a material fact required by the permit application form or a regulation applicable to the permit;
3. The terms and conditions of the permit have been or are being violated.

H. Certification of Truth, Accuracy, and Completeness ***[Mandated by 40 CFR §§70.5(a)(2), 70.6(a)(3)(iii)(B)] [Code §§3-1-083.A.5, 3-1-175 (as amended 10/12/95) approved as SIP Elements at 61 FR 15717 (4/9/96)]***

Any application form, report, or compliance certification submitted pursuant to the Code shall contain certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under Chapter 3 of the Code shall state that, based on information and belief formed after reasonable inquire, the statements and information in the document are true, accurate, and complete.

I. Renewal of Permit [***Mandated by*** 40 CFR §§70.5(a)(1)(iii), 70.7(c)]

Expiration of this permit will terminate the facility's right to operate unless either a timely application for renewal has been submitted in accordance with §§3-1-050, 3-1-055 and 3-1-060, or a substitute application for a general permit under §3-5-490. For Class I permit renewals, a timely application is one that is submitted at least 6 months, but not greater than 18 months prior to the date of the permit expiration. For Class II or Class III permit renewals, a timely application is one that is submitted at least 3 months, but not greater than 12 months prior to the date of permit expiration.

J. Severability [***Mandated by*** 40 CFR §70.6(a)(5)]

Pursuant to Code § 3-1-081.A.7., the provisions of this permit are severable, and if any provision of this permit is held invalid the remainder of this permit shall not be affected thereby.

K. Permit Shield [***Mandated by*** 40 CFR §70.6(f)] (Code § 3-1-102.)

Subject to the following schedule of exclusions, compliance with the terms of this permit shall be deemed compliance with any applicable requirement identified in §2 of this permit. The permit-shield exclusions include:

1. PGCAQCD Rule §7-3-1.3 OPEN BURNING;
2. PGCAQCD Rule §7-3-4.1 INDUSTRIAL - CARBON MONOXIDE EMISSIONS.
3. Items listed in Section 10 of this permit as not being federally enforceable.

L. Permit Revisions [***Mandated by*** 40 CFR §70.7(d), 70.7(e)] (Code Chapter 3, Article 2)

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

2. 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.

3. Permit amendments, permit revisions, and changes made without a permit revision shall conform to the requirements in Article 2, Chapter 3, of the Code.

4. Revision to Obtain Authority to Reconstruct ***[40 CFR 63.42(c)]*** Code §3-1-040.D.

Prior to commencing a reconstruction, as defined below, Permittee shall apply for and obtain a revision to this permit, which revised permit shall include a final and effective case-by-case determination pursuant to the provisions of 40 CFR 63.43 such that the emissions from the reconstructed facility will be controlled to a level no less stringent than the maximum achievable control technology emission limitation for new sources.

For purposes of this subsection, "reconstruction" is defined as the replacement of components at an existing process or production unit that in and of itself emits or has that potential to emit 10 tons per year of any HAP or 25 tons per year of any combination of HAP, whenever:

a. The fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable process or production unit; and

b. It is technically and economically feasible for the reconstructed major source to meet the applicable maximum achievable control technology emission limitation for new sources established under 40 CFR Part 63, Subpart B.

M. Permit Re-opening [***Mandated by*** 40 CFR §§70.6(a)(6)(iii), 70.7(g), 70.7(g)] (Code §3-1-087.)

1. This permit shall be reopened if:

a. Additional applicable requirements under the Clean Air Act (1990) become applicable to this source, and on that date, this permit has a remaining term of three or more years. Provided, that no such reopening under this subparagraph is required if the effective date of the newly applicable requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to Code §3-1-089.C.

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

c. The Control Officer determines that it needs to be revised or revoked to assure compliance with the applicable requirements; or

d. The EPA Administrator finds that cause exists to terminate, modify, or revoke and reissue this permit.

2. If this permit must be reopened or revised, the District will notify the permittee in accord with Code §3-1-087.A.3.

N. Record Retention [***Mandated by*** 40 CFR §70.6(a)(3)(ii)(B)] (Code §3-1-083.A.2.b)

Permittee shall retain for a period of five (5) years all documents required under this permit, including reports, monitoring data, support information, calibration and maintenance records, and all original recordings or physical records of required continuous monitoring instrumentation.

O. Scope of License Conferred [***Mandated by*** 40 CFR §70.6(a)(6)(iv)] (Code §3-1-081.)

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

P. Excess Emission Reports; Emergency Provision ***[Mandated by 40 CFR §70.6(g)]*** (Code §3-1-081.E, Code §8-1-030)

1. To the extent Permittee may wish to offer a showing in mitigation of any potential penalty, underlying upset events resulting in excess emissions shall 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:

i. Notifications by telephone or facsimile within 24 hours or the next business day, whichever is later, of the time when the owner or operator first learned of the occurrence of excess emissions, including all available information required under subparagraph b. below.

ii. Detailed written notification within 3 working days of the initial occurrence containing the information required under subparagraph b. below.

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

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

ii. The magnitude of the excess emissions expressed in the units of the

applicable limitation.

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

iv. The identity of the equipment from which the excess emissions occurred.

v. The nature and cause of such emissions.

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

vii. The steps that were or are being taken to limit the excess emissions. To the extent this permit defines procedures governing operations during periods of start-up or malfunction, the report shall contain a list of steps taken to comply with this permit.

viii. To the extent excess emissions are continuous or recurring, the initial notification shall include an estimate of the time the excess emissions will continue. Continued excess emissions beyond the estimated date will require an additional notification.

2. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires 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 emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

3. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of the following subparagraph are met.

4. 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(s) of the emergency;

b. The permitted facility was at the time being properly operated;

c. During the period of 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 or hand delivery within 2 working days of the time when emissions limitations were exceeded due to emergency. The notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective action taken.

10. Additional provisions applicable to Title V Sources (Code §3-1-081.B.2)

Subject to the following specific exclusions, all terms and conditions of this permit are enforceable by the Administrator and citizens under the Clean Air Act. The exclusions include:

A. Section 1. Introduction

B. Section 9.F Posting of Permit

C. Section 12 Emission Inventory Table

11. Equipment [***Mandated by*** 40 CFR §70.6(c)(3)(ii)]

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

Main Building

1. 8 - Fiber glass lay-up bays with dry filters
2. 4 - Fan systems
3. Natural gas fired equipment, aggregating a heat input capacity of not more than 10 mmBtu/hr.
4. 2 - Fiber glass lay-up bays with dry filters.

Appendix A

Semi-annual Report

Permit V20640.000

Abstract

This constitutes a semi-annual report of all required monitoring, documenting emissions during the subject reporting period.

Reporting Period - January-June _ or July-December __ Year ____

Facility - Arizona Environmental Container Corporation
850 N Davidson Blvd
Eloy, Arizona

Parametric emissions report

Natural gas burned during reporting period (§6.C.3) . . . . . _____ therms

On a separate sheet list the volumes of all resins, gelcoats, mold cleaners, solvents, and adhesives used during the period (§6.A.1). For resins and gel coats, indicate the HAP content.

MACT Compliance

1. Has Permittee manufactured any products other than those allowed by ¶5.B.1? . . . . . yes/no

2. Has Permittee exclusively used "FIT" or an equivalent technology to apply gel coat and resin products per ¶5.B.3? . . . . . yes/no

Other compliance issues

Has Permittee:

- Maintained a daily record of fan system operations, as required by ¶6.A.3? . . . . . yes/no

  Do any of the daily records disclose a failure to operate a specific fan for the 1-1/2 hour purge cycle required by ¶5.B.7.c? . . . . . yes/no

- Maintained product-information on each paint, gel coat, resin and solvent, as required under ¶6.A.1? . . . . . yes/no

- Performed the opacity screenings required under ¶6.A.2? . . . . . yes/no

- Verified the closure of the resin, gel coat and storage vessels, as required under ¶5.B.8.c and ¶6.A.4? . . . . . yes/no

- Maintained a log of mold cleaner use, as required under ¶6.A.5? . . . . . yes/no

- Maintained a log of exhaust filter inspections and replacements, as required under ¶6.A.6? . . . . . yes/no

- Maintained other records required under ¶6.B and ¶6.C?

  - ¶6.B - MACT compliance records? . . . . . yes/no
  - ¶6.C.1 - monitoring & testing records? . . . . . yes/no
  - ¶6.C.2 - startup, shutdown and upset events? . . . . . yes/no

On a separate sheet, describe and explain any monitoring activity or recordkeeping that occurred with respect to the Asbestos NESHAP or Stratospheric Ozone requirements respectively defined in §§5.G.1 and 5.G.2 of the permit during the reporting period.
Is such a supplemental disclosure attached? . . . . . YES/NO

On a separate sheet, describe and explain any previously un-reported deviations from the terms of this permit. Is such a supplemental disclosure attached (§7.A)? . . . . . YES/NO

Certification by Responsible Official

I certify that, based on information and belief formed after reasonable inquiry, that the statements and information in this report are true, accurate and complete.

Signed _____

Name _____

Title _____

Date _____

Mail to - Pinal County Air Quality Control District
PO Box 987
Florence, AZ 85232