

**PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY**

**150 West Congress Street • Tucson, AZ 85701 • Phone: (520) 740-3340**

**AIR QUALITY OPERATING PERMIT**

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

**ISSUED TO**

**Southwest Fiberglass, LLC**

**4798 South Julian Avenue**

**Tucson, AZ 85714**

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

THIS PERMIT ISSUED SUBJECT TO THE FOLLOWING **Conditions contained in Attachments “A”, “B”, and “C”.**

PDEQ PERMIT NUMBER **205** PERMIT CLASS **I** EXPIRATION DATE **February 3, 2007**

PERMIT ISSUED THIS **4th** DAY OF **February 2002** [*Revision Issued XXXXXXXX, 2005*]

***Kathi Lawrence Environmental Planning Manager, PDEQ***

SIGNATURE

TITLE

**Southwest Fiberglass, LLC  
Air Quality Permit # 205**

**Table of Contents**

<b>Permit Summary .....</b>	<b>3</b>
<b>Summary of Part B Requirements .....</b>	<b>4</b>
<b>Part A: General Provisions .....</b>	<b>7</b>
I.    Permit Expiration and Renewal .....	7
II.   Compliance with Permit Conditions .....	7
III.  Permit Revision, Reopening, Revocation and Reissuance, or Termination for Cause .....	7
IV.   Posting of Permit.....	8
V.    Fee Payment .....	8
VI.   Annual Emissions Inventory Questionnaire.....	8
VII.  Compliance Certification .....	8
VIII. Certification of Truth, Accuracy and Completeness.....	9
IX.   Inspection and Entry .....	9
X.    Permit Revision Pursuant to Federal Hazardous Air Pollutant Standard.....	9
XI.   Affirmative Defenses for Excess Emissions Due to Malfunctions, Startup, and Shutdown	10
XII.  Record Keeping Requirements .....	11
XIII. Reporting Requirements.....	12
XIV.  Duty to Provide Information .....	13
XV.   Permit Amendment or Revision.....	13
XVI.  Facility Change Allowed Without a Permit Revision.....	13
XVII. Testing Requirements.....	14
XVIII. Property Rights .....	15
XIX.  Severability Clause.....	15
XX.   Permit Shield.....	15
XXI.  Accident Prevention Requirements Under the Clean Air Act (CAA Section 112(r)).....	15
<b>Part B: Specific Provisions.....</b>	<b>17</b>
I.    Applicability.....	17
II.   Emission Limits and Standards.....	17
III.  Monitoring and Recordkeeping Requirements .....	21
IV.   Reporting Requirements.....	25
V.    Testing Requirements.....	28
<b>Part C: Applicable Regulations .....</b>	<b>29</b>
<b>Part D: Equipment List .....</b>	<b>30</b>

**Southwest Fiberglass, LLC.  
Air Quality Permit # 205**

**Summary**

Southwest Fiberglass LLC manufactures custom fiberglass storage tanks and ducts using reinforced plastic composites. The company uses several methods for applying the resins and gel-coats including hand lay-up, controlled and uncontrolled spraying, and filament winding. The primary pollutant of concern is styrene (both a VOC and a HAP found in the resins and the gel coats). Small amounts of methyl methacrylate (MMA) are emitted from one of the gel-coat products used. About 20% of the resin is applied by hand lay-up, about 55% by spraying, and about 25% by filament winding. About half of the resin spraying is conducted with chopper guns using fluid impingement technology (FIT) nozzles. The remaining half of the resin spraying is uncontrolled. None of the resins or gel coats consumed utilize a vapor suppressant. The primary clean-up solvent is Acetone. Southwest Fiberglass, LLC. is an existing major source of a single hazardous air pollutant (styrene), a major source of a combination of HAPs (styrene and MMA), a synthetic minor source of VOC, and a true minor source of all other criteria pollutants.

Affected Emission Source Classification: Class I stationary source subject to the provisions of 40 CFR 63 Subpart WWWW National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, the Pima County State Implementation Plan (Pima County SIP) and Title 17 of the Pima County Code.

**All terms and conditions of this permit are federally enforceable unless stated otherwise.**

Emission Estimates: The following emission rates are included for reference purposes only and are not intended to be enforced by direct measurement unless otherwise noted herein. They were determined based on information supplied by the Permittee, the July 23, 2001 Unified Emission Factors for Open Molding of Composites document, and standard EPA AP-42 emission factors. These emissions represent the source's potential-to-emit operating in compliance with the provisions of this Permit. These emissions shall not be considered as a case-by-case determination of an emission limit for the purpose of determining future permit revisions pursuant to Title 17 of the Pima County Code (PCC §17.12.250.A.3).

<b>Pollutant</b>	<b>Pounds per Hour</b>	<b>Tons Per Year</b>
Volatile Organic Compounds (VOC)	19.6	86.0
Total Hazardous Air Pollutants (HAPS)	19.6	86.0

40 CFR 63 Subpart WWWW was promulgated April 21, 2003; compliance is required by April 21, 2006.

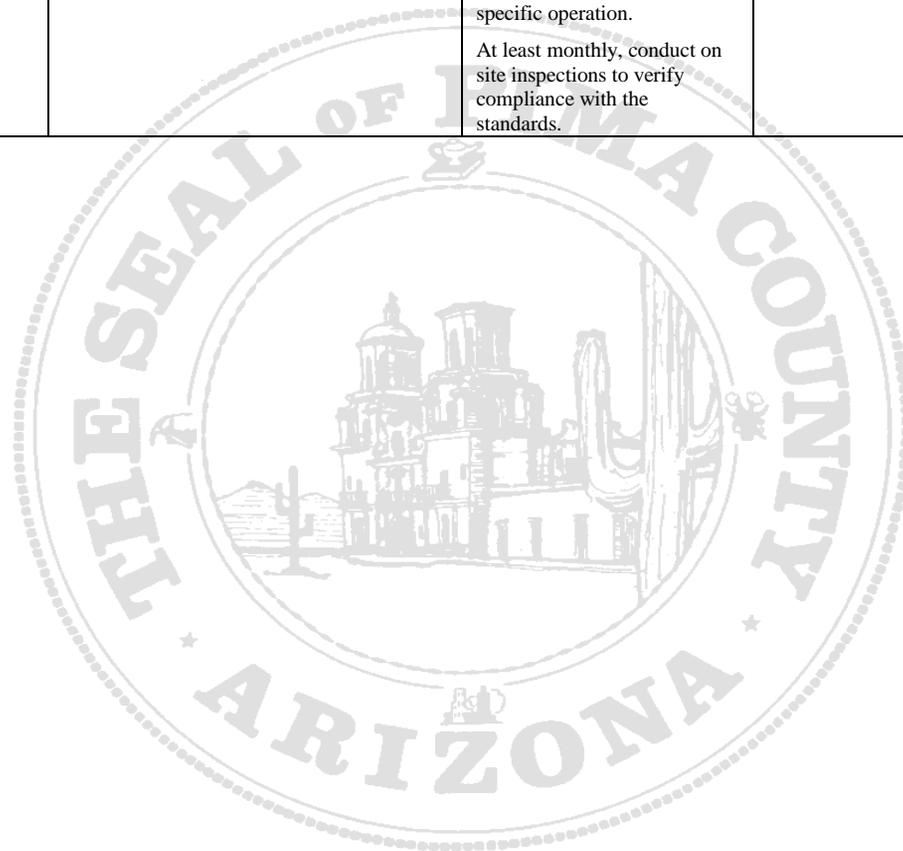
**Southwest Fiberglass, LLC.  
Air Quality Permit # 205**

**Summary of Part B Requirements**

Emission Unit	Pollutants Emitted	Emission Limits & Standards	Monitoring & Recordkeeping	Reporting	Testing Frequency & Methods
<p>Reinforced Plastic Composites Production.</p> <p>[40 CFR 63 Subpart WWWW, SIP Rules 321 and 344, and PCC Rules 17.16.030, 17.16.040, 17.16.050, and 17.16.400]</p>	<p>PM<sub>10</sub>, VOC, and HAPs</p>	<p>Annual resin limit = 1,238,510 pounds.</p> <p>Annual gel coat limit = 30,600 pounds.</p> <p>Annual resin hand lay up limit = 247,702 pounds.</p> <p>Annual resin mechanical atomized application limit = 681,180 pounds.</p> <p>Monthly resin mechanical atomized application with FIT technology shall constitute at least 50% of all resin sprayed.</p> <p>Annual resin filament winding limit = 309,628 pounds.</p> <p>Resin styrene content limit = 50%.</p> <p>Resin HAP content limits:</p> <ul style="list-style-type: none"> <li>• ≤ 50% for all operations;</li> <li>• Open Molding CR/HS: <ul style="list-style-type: none"> <li>• ≤ 46.2% for Non-Atomized Mechanical Application;</li> <li>• ≤ 42.0% for Filament Application;</li> <li>• ≤ 40.0% for Manual Application;</li> </ul> </li> <li>• Open Molding Non-CR/HS: <ul style="list-style-type: none"> <li>• ≤ 38.4% for Mechanical Application;</li> <li>• ≤ 45.0% for Filament Application;</li> <li>• ≤ 33.6% for Manual Application;</li> </ul> </li> <li>• Open Molding - Tooling: <ul style="list-style-type: none"> <li>• ≤ 43.0% for Atomized Mechanical Application;</li> <li>• ≤ 45.9% for Manual Application.</li> </ul> </li> </ul> <p>Gel coat styrene content limit = 40%.</p>	<p>Maintain on site copies of the manufacturer's product data sheet for each product used in the process.</p> <p>Maintain records for Compliance Status Notifications, information related to startup, shutdown, and malfunction, performance tests and evaluations, all data and calculations for HAP content determinations, and a certified statement of compliance with work practice standards.</p> <p>Format records according to 40 CFR 63.</p> <p>(Additional requirements in All Operations).</p>	<p>Initial Compliance Report due April 21, 2007.</p> <p>Notification of Compliance Status due May 21, 2006.</p> <p>Immediate Excess Emissions Reporting.</p> <p>Semiannual Summary Reports of Required Monitoring.</p> <p>Semiannual Compliance Certification Reporting.</p> <p>Annual Emissions Inventory when requested.</p>	<p>EPA Test Method 9 shall be used to monitor compliance with the opacity standard.</p> <p>Testing to confirm the validity of product information sheets required as necessary.</p>

Emission Unit	Pollutants Emitted	Emission Limits & Standards	Monitoring & Recordkeeping	Reporting	Testing Frequency & Methods
[Reinforced Plastic Composites Production continued]	PM <sub>10</sub> , VOC, and HAPs	<p>Gel coat methyl methacrylate limit = 5%.</p> <p>Gel coat HAP content limits:</p> <ul style="list-style-type: none"> <li>• ≤ 45% for all operations;</li> <li>• Open Molding: <ul style="list-style-type: none"> <li>• ≤ 40.0% for Tooling Gel Coat;</li> <li>• ≤ 30.0% for White/Off-White Pigmented Gel-Coat;</li> <li>• ≤ 37.0% for All other pigmented Gel-Coat;</li> <li>• ≤ 44.0% for Clear production Gel-Coat</li> </ul> </li> </ul> <p>Cleanup solvents shall not contain VOC or HAPs except for solvents used to clean cured material.</p> <p>Cover all VOC and HAP storage vessels.</p> <p>No visible gaps in covers on resin mixers.</p> <p>No centrifugal casting, continuous lamination/ casting, or pultrusion operations.</p>			
Surface coating operations. [SIP Rules 321 and 344, PCC 17.16.030, 17.16.040, 17.16.050, and 17.16.400]	PM <sub>10</sub> , VOC, and HAPs	<p>Paint usage limited to 600 gallons per 12-months.</p> <p>Volatile portion of any paint shall not contain more than two (2) pounds of combined VOC and HAPs per gallon.</p> <p>Enclosure with 96% overspray control.</p> <p>No photochemically reactive solvents to be used in architectural coatings.</p>	<p>Maintain on site copies of the manufacturer's product data sheet for each product used in the process.</p> <p>Additional requirements below.</p>	<p>Immediate Excess Emissions Reporting.</p> <p>Semiannual Summary Reports of Required Monitoring.</p> <p>Semiannual Compliance Certification Reporting.</p> <p>Annual Emissions Inventory when requested</p>	<p>EPA Test Method 9 shall be used to monitor compliance with the opacity standard.</p> <p>Testing to confirm the validity of product information sheets required as necessary.</p>
All operations (including Reinforced Plastic Composites Production and Surface Coating Operations).	PM <sub>10</sub> , VOC, and HAPs.	<p>Limit odors.</p> <p>Opacity ≤40%.</p> <p>Opacity ≤20% after April 23, 2006.</p> <p>No visible emissions allowed beyond the property line.</p>	<p>Monitor monthly the amount of resins, gel coats, paint products, and VOC and/or HAP containing cleanup solvents used in the specific operations.</p>	<p>Immediate Excess Emissions Reporting.</p> <p>Semiannual Summary Reports of Required Monitoring.</p> <p>Semiannual Compliance Certification Reporting.</p>	<p>EPA Test Method 9 shall be used to monitor compliance with the opacity standard.</p> <p>Testing to confirm the validity of product information sheets required as necessary.</p>

Emission Unit	Pollutants Emitted	Emission Limits & Standards	Monitoring & Recordkeeping	Reporting	Testing Frequency & Methods
All operations (including Reinforced Plastic Composites Production and Surface Coating Operations continued).	PM <sub>10</sub> , VOC, and HAPs.	Volatile substances shall be handled in such a manner that they will not be released into the ambient air.	<p>Monthly calculate and record the VOC and HAP emissions in all operations in the previous month and previous 12-month period in each specific operation.</p> <p>At least monthly, conduct on site inspections to verify compliance with the standards.</p>	Annual Emissions Inventory when requested	



**Southwest Fiberglass, LLC.**  
**Air Quality Permit # 205**

**Part A: General Provisions**

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

- I. Permit Expiration and Renewal [A.R.S. § 49-480.A, PCC 17.12.160.C.2 & PCC 17.12.180.A.1]
- A. This permit is valid for a period of five years from the date of issuance of the permit.
- B. The Permittee shall submit an application for renewal of this permit at least 6 months, but not greater than 18 months prior to the date of permit expiration.
- II. Compliance With Permit Conditions [17.12.180.A.8.a & b]
- A. The Permittee shall comply with all conditions of this permit including all applicable requirements of Arizona air quality statutes and the air quality rules. Any permit noncompliance constitutes a violation of the Arizona Revised Statutes and 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. Need to halt or reduce activity not a defense. It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- III. Permit Revision, Reopening, Revocation and Reissuance, or Termination for Cause [17.12.180.A.8.c & 17.12.270]
- A. The permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a permit revision, revocation and reissuance, or termination; or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- B. The permit shall be reopened and revised under any of the following circumstances:
1. Additional applicable requirements under the Act become applicable to a major source. Such reopening shall only occur if there are three or more years remaining in the permit term. The reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to PCC 17.12.280. Any permit reopening required pursuant to this paragraph shall comply with provisions in PCC 17.12.280 for permit renewal and shall reset the five-year permit term.
  2. Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the Class I permit.
  3. The control officer or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
  4. The control officer or the Administrator determines that the permit needs to be revised or revoked to assure compliance with the applicable requirements.
- C. Proceedings to reopen and issue a permit, including appeal of any final action relating to a permit reopening, shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopenings shall be made as

expeditiously as practicable. Permit reopenings for reasons other than those stated in paragraph III.B.1 of this Part shall not result in the resetting of the five-year permit term.

IV. Posting of Permit

[PCC 17.12.080]

- A. Permittee shall post such permit, or a certificate of permit issuance on location where the equipment is installed in such a manner as to be clearly visible and accessible. All equipment covered by the permit shall be clearly marked with one of the following:
1. Current permit number.
  2. Serial number or other equipment number that is also listed in the permit to identify that piece of equipment.
- B. In the event that the equipment is so constructed or operated that such 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.
- C. A copy of the complete permit shall be kept on the site.

V. Fee Payment

[PCC 17.12.180.A.9 & 17.12.510]

Permittee shall pay fees to the control officer pursuant to A.R.S. § 49-480.D and PCC 17.12.510.

VI. Annual Emissions Inventory Questionnaire

[PCC 17.12.320]

- A. When requested by the control officer, the Permittee shall complete and submit an annual emissions inventory questionnaire. The questionnaire is due by March 31 or ninety days after the control officer makes the request and provides the inventory form each year, whichever occurs later, and shall include emission information for the previous calendar year.
- B. The questionnaire shall be on a form provided by or approved by the control officer and shall include the information required by 17.12.320.

VII. Compliance Certification

[PCC 17.12.180.A.5 & 17.12.220.A.2]

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

- A. The compliance certification shall include the following:
1. Identification of each term or condition contained in the permit including emission limitations, standards, or work practices that are the basis of the certification;
  2. Identification of method(s) or other means used by the owner or operator 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 the monitoring, related recordkeeping and reporting sections of this permit;
  3. The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall identify each deviation and take it into account in the compliance certification; and

4. A progress report on all outstanding compliance schedules submitted pursuant to PCC 17.12.220.
- B. A copy of all compliance certifications for Class I permits shall also be submitted to the EPA Administrator.

The address for the EPA administrator is:

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

VIII. Certification of Truth, Accuracy and Completeness [PCC 17.12.210.A.3]

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

IX. Inspection and Entry [PCC 17.12.210.A.4]

The Permittee shall allow the control officer or the authorized representative of the control officer upon presentation of proper credentials to:

- A. Enter upon the Permittee's premises where a source is located or emissions-related activity is conducted, or where records are required to be kept under the conditions of the permit;
- B. Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;
- C. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
- D. Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements; and
- E. Record any inspection by use of written, electronic, magnetic and photographic media.

X. Permit Revision Pursuant to Federal Hazardous Air Pollutant Standard [PCC 17.12.160.C.4]

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

XI. Affirmative Defenses for Excess Emissions Due To Malfunctions, Startup, and Shutdown [A.R.S. §49-480.B & A.A.C. 18-2-310]

- A. Applicability. This permit condition 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:
  1. Promulgated pursuant to Sections 111 or 112 of the Act,
  2. Promulgated pursuant to Titles IV or VI of the Clean Air Act,
  3. Contained in any Prevention of Significant Deterioration (PSD) or New Source Review (NSR) permit issued by the U.S. E.P.A.,

4. Contained in PCC 17.16.280.F, or
5. Included in a permit to meet the requirements of PCC 17.16.590.A.5.

B. 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 of XIII.B of this Part and has demonstrated all of the following:

1. 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;
2. 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;
3. 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;
4. The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;
5. All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;
6. The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance;
7. 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;
8. 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;
9. All emissions monitoring systems were kept in operation if at all practicable; and
10. The owner or operator's actions in response to the excess emissions were documented by contemporaneous records.

C. Affirmative Defense for Startup and Shutdown

1. Except as provided in XI.C.2, 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 owner or operator of a source with emissions in excess of an applicable emission limitation due to startup and shutdown has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the owner or operator of the source has complied with the reporting

requirements of XIII.B of this Part and has demonstrated all of the following:

- a. The excess emissions could not have been prevented through careful and prudent planning and design;
  - b. 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;
  - c. 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;
  - 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. 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;
  - g. All emissions monitoring systems were kept in operation if at all practicable; and
  - h. The owner or operator's actions in response to the excess emissions were documented by contemporaneous records.
2. If excess emissions occur due to a malfunction during routine startup and shutdown, then those instances shall be treated as other malfunctions subject to XI.B.
- D. Affirmative Defense for Malfunctions During Scheduled Maintenance
- If excess emissions occur due to a malfunction during scheduled maintenance, then those instances will be treated as other malfunctions subject to XI.B.
- E. Demonstration of Reasonable and Practicable Measures
- For an affirmative defense under XI.B or C, the owner or operator of the source shall demonstrate, through submission of the data and information required by this Section and XII.B, that all reasonable and practicable measures within the owner or operator's control were implemented to prevent the occurrence of the excess emissions.

## XII. Record Keeping Requirements

[PCC 17.12.180.A.4]

- A. Permittee shall keep records of all required monitoring information including, but not limited to, the following:
1. The date, place as defined in the permit, and time of sampling or measurements;
  2. The date(s) analyses were performed;
  3. The name of the company or entity that performed the analyses;
  4. A description of the analytical techniques or methods used;

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

### XIII. Reporting Requirements

[PCC 17.12.180.A.5.a]

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

- A. Compliance certifications pursuant to Part "A", Section VII of this permit.
- B. Excess Emissions Reporting Requirements [PCC 17.28.065, A.R.S. §49-480.B & A.A.C. 18-2-310.01]
1. The owner or operator of any source shall report to the control officer any emissions in excess of the limits established by this permit. The report shall be in two parts as specified below:
    - a. Notification by telephone or facsimile within 24 hours of the time the owner or operator first learned of the occurrence of excess emissions that includes all available information from XIII.B.2.  
The number to call to report excess emissions is **520-740-3340**.
    - b. Detailed written notification by submission of an excess emissions report within 72 hours of the notification under XIII.B.1.a.  
The report shall be mailed to: **PDEQ 150 W. Congress St. Tucson AZ, 85701**.
  2. The excess emissions report shall contain the following information:
    - a. The identity of each stack or other emission point where the excess emissions occurred;
    - b. 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;
    - c. The time and duration or expected duration of the excess emissions;
    - d. The identity of the equipment from which the excess emissions emanated;
    - e. The nature and cause of the emissions;
    - f. The steps taken, if the excess emissions were the result of a malfunction, to remedy the malfunction and the steps taken or planned to prevent the recurrence of the malfunctions;
    - g. The steps that were or are being taken to limit the excess emissions; and
    - h. If the source's permit contains procedures governing source operation during periods of startup or malfunction and the excess emissions resulted from startup or malfunction, a list of the steps taken to comply with the permit procedures.
  3. In the case of continuous or recurring excess emissions, the notification requirements of this

Section shall be satisfied if the source provides the required notification after excess emissions are first detected and includes in the notification an estimate of the time the excess emissions will continue. Excess emissions occurring after the estimated time period or changes in the nature of the emissions as originally reported shall require additional notification pursuant to XIII.B.1 and 2.

- C. Permit Deviations (Other Than Excess Emissions) Reporting Requirements. 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. For the purposes of this condition, "promptly report" shall mean that the Permittee submitted the report to the control officer by certified mail or hand-delivery within two working days of the of time the deviation was discovered.
- D. Reporting requirements listed in Part "B" of this permit.

XIV. Duty to Provide Information

[PCC 17.12.160.G & 17.12.180.A.8.e]

- 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.

XV. Permit Amendment or Revision

[PCC 17.12.240, 17.12.250 & 17.12.260]

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

- A. Administrative Permit Amendment (PCC 17.12.240.);
- B. Minor Permit Revision (PCC 17.12.250.);
- C. Significant Permit Revision (PCC 17.12.260.).

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

XVI. Facility Change Without Permit Revision

[PCC 17.12.230]

- A. Permittee may make changes at the permitted source without a permit revision if all of the following apply:
  - 1. The changes are not modifications under any provision of Title I of the Act or under A.R.S. § 49-401.01(17).
  - 2. The changes do not exceed the emissions allowable under the permit whether expressed therein as a rate of emissions or in terms of total emissions.
  - 3. The changes do not violate any applicable requirements or trigger any additional applicable requirements.
  - 4. The changes satisfy all requirements for a minor permit revision under PCC 17.12.250.

5. The changes do not contravene federally enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, 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 it meets all of the requirements of subsections (A) and (C) of this Section.
- C. For each such change under subsections A and B of this Section, a written notice by certified mail or hand delivery shall be received by the control officer and, for Class I permits, the Administrator, a minimum of 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 as possible or, if advance notification is not practicable, as soon after the change as possible. Each notification shall include:
  1. When the proposed change will occur.
  2. A description of each such change.
  3. Any change in emissions of regulated air pollutants.
  4. The pollutants emitted subject to the emissions trade, if any.
  5. The provisions in the implementation plan that provide for the emissions trade with which the source will comply and any other information as may be required by the provisions in the implementation plan authorizing the trade.
  6. If the emissions trading provisions of the implementation plan are invoked, then the permit requirements with which the source will comply.
  7. Any permit term or condition that is no longer applicable as a result of the change.

## XVII. Testing Requirements

[PCC 17.12.050]

### A. Operational Conditions During Testing

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

### B. Test Plan

At least 14 calendar days prior to performing a test, the Permittee shall submit a test plan to the control officer, in accordance with PCC 17.12.050.B. and the Arizona Testing Manual. This test plan must include the following:

1. test duration;
2. test location(s);
3. test method(s); and

4. source operation and other parameters that may affect test results.

C. Stack Sampling Facilities

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

1. Sampling ports adequate for test methods applicable to the facility;
2. Safe sampling platforms;
3. Safe access to sampling platforms; and
4. Utilities for sampling and testing equipment.

D. Interpretation of Final Results

Each performance test shall consist of three separate runs using the required test method. Each run shall be conducted in accordance with the applicable standard and test method. For the purpose of determining compliance with an applicable standard, the arithmetic means of results of the three runs shall apply. If a sample is accidentally lost or conditions occur which are not under the Permittee's control and which may invalidate the run, compliance may, upon the control officer's approval, be determined using the arithmetic mean of the other two runs.

E. 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 17.12.050.A.

F. Cessation of Testing After the First Run Has Started

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 conditions 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 that demonstrates good cause must be submitted.

XVIII. Property Rights

[PCC 17.12.180.A.8.d]

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

XIX. Severability Clause

[PCC 17.12.180.A.7]

The provisions of this permit are severable. If any provision of this permit is held invalid, the remainder of this permit shall not be affected thereby.

XX. Permit Shield

[PCC 17.12.310]

Compliance with the conditions of this permit shall be deemed compliance with the applicable requirements identified in Part "C" of this permit. The permit shield shall not apply to any change made pursuant to Section XV.B of this Part and Section XVI of this Part.

XXI. Accident Prevention Requirements Under The Clean Air Act (CAA Section 112(R))

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



**Southwest Fiberglass, LLC.  
Air Quality Permit # 205**

**Part B: Specific Conditions**  
**[All standards are federally enforceable unless otherwise noted]**  
[References are to Title 17 of the Pima County Code unless otherwise noted]

**I. Applicability**

This Part contains requirements that apply to the reinforced plastics composites production and surface coating activities conducted at the site. 40 CFR 63 Subpart WWWW – Reinforced Plastic Composites Production, Title 17 of the Pima County Code (PCC), Section 17.16.400, "Organic solvents and other organic materials", Section 17.16.430, "Standards of performance for unclassified sources" apply, as do some provisions of the Pima County SIP. A complete set of applicable requirements may be found in Part C.

- A. This is a revision to the five-year Title V permit for a Class I source in response to a permit application dated May 20, 2004 to include 40 CFR 63 Subpart WWWW which was promulgated on April 21, 2003; the compliance date is April 21, 2006. This permit was renewed in February 2002 in response to an application dated June 08, 2001
- B. Affected Emission Source or Process: This Part B contains specific operating requirements for the manufacture of custom fiberglass storage tanks and ducts using reinforced plastic composites and includes:
  - 1. Reinforced Plastic Composites Production; and
  - 2. Surface Coating Operations.The source does not have any centrifugal casting or continuous lamination/ casting operations (as defined in 40 CFR Subpart WWWW and emits less than 100 TPY of HAPs)
- C. Affected Emission Source Classification: **Class I Stationary Major Source.**

**II. Emission Limits & Standards**

[PCC 17.12.180]

- A. Reinforced Plastic Composites Production
  - 1. The Permittee shall not use more products, calculated as a 12-month rolling total, than listed in the following table: [PCC 17.12.220] **[Material Permit Condition]**

Product Type	Maximum Usage per 12-Month Period
Polyester Resins and Vinyl Esters	1,238,510 lbs.
Gel Coats	30,600 lbs.
  - 2. The Permittee shall not use more polyester resins or vinyl esters, calculated as a 12-month rolling total, in each operation than listed in the following table: [PCC 17.12.220] **[Material Permit Condition]**

Operation Type	Maximum Pounds per 12-Month Period
Manual (hand lay-up)	247,702
Mechanical Atomized	681,180 <sup>1</sup>
Filament Application	309,628

3. The Permittee shall not use any polyester resin or vinyl ester product containing more than 50 percent (50%) by weight of styrene (CAS Number 100425). Additionally, no resin consumed on-site shall contain HAPs in excess of the values in the following table:
- [PCC 17.12.220 & 40 CFR 63.5810(d) Table 3][Material Permit Conditions]

Operation	Resin Application Method	Maximum Organic HAP content (% by Weight)
All Operations	All Application Methods	50.0%
Open Molding – Corrosion Resistant and/or High Strength (CR/HS)	Non-Atomized Mechanical Application	46.2%
	Filament Application	42.0%
	Manual Application	40.0%
Open Molding – Non-CR/HS	Mechanical Application	38.4%
	Filament Application	45.0%
	Manual Application	33.6%
Open Molding – Tooling	Atomized Mechanical Application	43.0%
	Manual Application	45.9%

4. The Permittee shall not use any gel coat products containing more than 40 percent (40%) by weight of styrene (CAS Number 100425) nor more than 5 percent (5%) by weight of methyl methacrylate (CAS Number 80626). Additionally, no gel coat consumed on-site shall contain HAPs in excess of the values in the following table:
- [PCC 17.12.220 & 40 CFR 63.5810(d) Table 3][Material Permit Conditions]

Operation	Gel-Coat Application Method	Maximum Organic HAP content (% by Weight)
All Operations	All Gel-Coat Application Methods	45.0%
Open Molding	Tooling Gel-Coat	40.0%
	White/Off-White Pigmented Gel-Coat	30.0%
	All other Pigmented Gel-Coat	37.0%
	Clear Production Gel-Coat	44.0%

<sup>1</sup> Of the total amount actually sprayed each month, the Permittee shall apply at least 50% by weight of all polyester resin and vinyl ester material sprayed using spray guns equipped with fluid impingement technology (FIT) nozzles. [PCC 17.12.220]

5. Work Practice Standards

[PCC 17.12.220 & 40 CFR 63 Subpart WWWW, Table 4]

**[Material Permit Conditions]**

- a. The Permittee shall not use cleaning solvents that contain HAP or VOC except for the use of styrene in closed systems and organic HAP cleaners to remove cured resin from application equipment.
- b. The Permittee shall keep containers that store VOC and/or 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.
- c. The Permittee shall use mixer covers with no visible gaps, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation. The Permittee shall close any mixer vents when actual mixing is occurring, except that venting is allowed during addition or materials, or as necessary prior to adding material or opening the cover for safety.

6. Permittee shall not conduct any centrifugal casting, continuous lamination/casting, or pultrusion operations (as defined in Subpart WWWW).

[PCC 17.12.220]

**[Material Permit Condition]**

B. Surface Coating Operations

1. Material Use Limitation

[PCC 17.12.220][Material Permit Conditions]

- a. The Permittee shall not use more than 600 gallons of paint products (calculated as a 12-month rolling total) during any 12-month period.
- b. The Permittee shall not allow any paint product to exceed a volatile content of two (2) pounds of combined VOC and HAPs per gallon of paint (as applied).

2. Operational Limitation

The Permittee shall not conduct any spray paint operation without minimizing organic solvent emissions. Such operations other than architectural coating and spot painting shall be conducted in an enclosed area equipped with controls containing no less than 96 percent of the overspray.

[PCC 17.16.400.C.1][Material Permit Condition]

**[Locally Enforceable Condition]**

3. Volatile Organic Compound (VOC) Limitation

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

[PCC 17.16.400.A]

4. The Permittee shall not either:

[PCC 17.16.400.C.2][Locally Enforceable Condition]

- a. Employ, apply, evaporate or dry any architectural coating containing photochemically reactive solvents for industrial or commercial purposes; or,
- b. Thin or dilute any architectural coating with a photochemically reactive solvent.

- c. For purposes of II.B.4.a, a photochemically reactive solvent shall be any solvent with an aggregate of more than 20 percent of its total volume composed of the chemical compounds classified in subparagraphs a through c of this paragraph, or which exceeds any of the following percentage composition limitations, referred to the total volume of solvent:
- i. A combination of the following types of compounds having an olefinic or cyclo-olefinic type of unsaturation -- hydrocarbons, alcohols, aldehydes, esters, ethers, or ketones: five percent.
  - ii. A combination of aromatic compounds with eight or more carbon atoms to the molecule, except ethylbenzene: eight percent.
  - iii. A combination of ethylbenzene, ketones having branched hydrocarbon structures, trichloroethylene or toluene: 20 percent.
- d. Whenever any organic solvent or any constituent of an organic solvent may be classified from its chemical structure into more than one of the groups of organic compounds described in II.B.4.c (i), (ii), or (iii) it shall be considered to be a member of the group having the least allowable percent of the total volume of solvents.

C. All Operations

1. Odor Limiting Standard

The Permittee shall not emit gaseous or odorous materials from equipment, operations, or premises under his control in such quantities as to cause air pollution.

[PCC 17.16.030 & SIP 344]

2. Opacity Standards:

The Permittee shall not cause or permit the effluent from a single emission point, multiple emission point, or fugitive emissions source to have an average optical density greater than 20%.

[PCC 17.16.040 & SIP 311]

3. The Permittee shall not allow diffusion of visible emissions beyond the property boundary line within which the emissions become airborne without taking reasonably necessary precautions to control generation of airborne particulate matter.

[PCC 17.16.050.D.1&2 & SIP 343]

4. 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]**

5. Where a stack, vent or other outlet is at such a level that fumes, gas mist, odor, smoke, vapor or any combination thereof constituting air pollution are discharged to adjoining

property, the control officer may require the installation of abatement equipment or the alteration of such stack, vent or other outlet by the owner or operator thereof to a degree that will adequately dilute, reduce or eliminate the discharge of air pollution to adjoining property. [PCC 17.16.430.G][**Locally Enforceable Condition**]

### III. Monitoring & Recordkeeping Requirements

[PCC 17.12.180]

#### A. Reinforced Plastic Composites Production

1. In order to demonstrate compliance with the organic HAP limitations for resins and gel coats in II.A.3.a & 4, the Permittee shall maintain onsite information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS). The Permittee shall use the following procedures, as applicable:  
[40 CFR 63.5797]
  - a. Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for Occupational Safety and Health Administration-defined carcinogens, as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other organic HAP compounds. [40 CFR 63.5797(a)]
  - b. If the organic HAP content is provided by the material supplier or manufacturer as a range, you must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content, such as an analysis of the material by EPA Method 311 of appendix A to 40 CFR part 63, exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then you must use the measured organic HAP content to demonstrate compliance. [40 CFR 63.5797(b)]
  - c. If the organic HAP content is provided as a single value, you may use that value to determine compliance. If a separate measurement of the total organic HAP content is made and is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then you still may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then you must use the measured organic HAP content to demonstrate compliance. [40 CFR 63.5797(c)]
  - d. The Product information sheet must contain sufficient information to allow the Permittee to determine the weight or density of the product and the amount (in weight percent of total product) and chemical abstract service (CAS) number of each volatile organic compound and hazardous air pollutant contained in the product. [PCC 17.12.220]
2. The Permittee shall keep the following records:
  - a. A copy of each notification and report that has been submitted to comply with this permit, including all documentation supporting any Initial Notification or Notification of Compliance Status that has been submitted. [40 CFR 63.5915(a)(1)]
  - b. The records in §63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction. [40 CFR 63.5915(a)(2)]

- c. Records of performance tests, design, and performance evaluations (if required) as stipulated in §63.10(b)(2). [40 CFR 63.5915(a)(3)]
- d. All data, assumption, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in II.A.3 & 4 of this Part. [40 CFR 63.5915(c)]
- e. A certified statement that the Permittee is in compliance with the work practice standards in II.A.5 of this Part. [40 CFR 63.5915(d)]

3. Format of Records [40 CFR 63.5920]

- a. The Permittee shall maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection. [40 CFR 63.5920(a)]
- b. The Permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. [40 CFR 63.5920(b)]
- c. The Permittee shall keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee may keep the records offsite for the remaining 3 years. [40 CFR 63.5920(c)]
- d. The Permittee may keep record in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche. [40 CFR 63.5920(d)]

B. Surface Coating Operations

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

- 1. 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. [Locally Enforceable Condition]
- 2. 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. [Locally Enforceable Condition]

C. All Operations

- 1. Within ten working days of the beginning of each new calendar month, the Permittee shall monitor and record the following information: [PCC 17.12.180]
  - a. The amount (in pounds) and the VOC content (percent by weight) and the HAP content (percent by weight) of each polyester resin or vinyl ester used during the

previous calendar month and previous 12-consecutive months in each of the following operations:

- i. Manual (hand lay-up) application.
  - ii. Mechanical atomized application (without fluid impingement technology nozzles).
  - iii. Mechanical atomized application (without fluid impingement technology nozzles).
  - iv. Filament application.
- b. The amount (in pounds) and the VOC content (percent by weight) and the HAP content (percent by weight) of each HAP for each gel coat product used during the previous calendar month and previous 12-consecutive months.
- c. The amount (gallons) cleanup solvent containing any VOC or HAP, the VOC content (percent by weight), and HAP content (percent by weight) used during the previous calendar month and previous 12-consecutive months.
- d. The amount (gallons) of paint products, the VOC content (percent by weight), and HAP content (percent by weight) used during the previous calendar month and previous 12-consecutive months.
2. Using the information recorded in III.C.1, within ten working days of the beginning of each new calendar month, the Permittee shall calculate and record each of the following (in tons) for the previous month:
- a. Total VOC and total HAP emissions from each of the following polyester resin or vinyl ester application operations:
    - i. Manually applied.
    - ii. Mechanical atomized application without fluid impingement technology nozzles.
    - iii. Mechanical atomized application with fluid impingement technology nozzles.
    - iv. Filament application.
  - b. Total VOC and total HAP emissions from all gel coat application operations.
  - c. Total VOC and total HAP emissions from all cleanup solvents used.
  - d. Total VOC and total HAP emissions from all paint products applied.
  - e. Total VOC and total HAP emissions from all operations.
  - f. The total VOC and total HAP emissions from all operations in the previous 12-consecutive months. Rolling 12-month totals shall be calculated by taking the twelve most recent completed calendar months and adding the totals for each of

those months. For the purposes of these calculations, the Permittee may use the following procedures:

- i. Providing the Permittee is in compliance with II.A.3.a of this Part, the Permittee may assume that all polyester resins and vinyl esters used during the period contained a styrene content of 50 percent (50%) by weight. In that case, the Permittee may use the following emission factors:
    - (a). For manual application (hand lay-up): 180 pounds of VOC and HAP emitted per ton of resin or ester processed.
    - (b). For mechanical atomized application (without fluid impingement technology nozzles): 354 pounds of VOC and HAP emitted per ton of resin or ester processed.
    - (c). For mechanical atomized application (with fluid impingement technology nozzles): 273 pounds of VOC and HAP emitted per ton of resin or ester processed.
    - (d). For filament application: 215 pounds of VOC and HAP emitted per ton of resin or ester processed.
  - ii. Providing the Permittee is in compliance with II.A.3 of this Part, the Permittee may assume that all gel coats used during the period contained a styrene content of 40 percent (40%) by weight and 5 percent (5%) by weight of methyl methacrylate. In that case, the Permittee may use the following emission factor: 514 pounds of VOC and HAP emitted per ton of gel coat processed.
  - iii. Providing the Permittee is in compliance with II.B.1.b of this Part, the Permittee may assume that all paint products applied contained a combined VOC and HAP content of 2 pounds per gallon.
  - iv. The Permittee's use of other emission factors is contingent upon approval, in advance of their use, by the EPA Administrator and the Control Officer.
3. At least once during each calendar month, the Permittee shall conduct and record the results of an on site inspection. The inspection shall be conducted while resins or gel coats are being applied and shall address the following items:
- a. That the cleanup solvent used contains no VOC or HAP constituents (except as provided in II.A.5.a).
  - b. That all storage vessels containing VOC or HAP are completely covered (except as provided in II.A.5.b).
  - c. That covers on resin and gel coat mixers have no visible gaps. (except as provided in II.A.5.c)
  - d. That odors and visible emissions are not observed outside the production buildings.

- e. That architectural coatings used on site are not photochemically reactive.
- f. Records of 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 (i.e., items III.C.3.a through e) with discrepancies noted, and any corrective action taken.

#### IV. Reporting Requirements

[PCC 17.12.180.A.5. & PCC 17.12.210]

##### A. Reinforced Plastic Composites Production

###### 1. Initial Compliance Report

By April 21, 2007 the Permittee shall demonstrate initial compliance with each organic HAP emissions standard contained in this Part with a notice of compliance status which includes detailed certified statements that conditions II.A.3 and II.A.4 of this Part have been and are being fully implemented. [40 CFR 63.5860 and Tables 8 & 9]

###### 2. Notification of Compliance Status

For HAP related emission limits and standards, the Permittee shall submit to the control officer, not later than May 21, 2006, a Notification of Compliance Status signed by the responsible official who shall certify its accuracy, attesting to whether the source has complied with the relevant standard. The notification shall list: [40 CFR 63.9(h) & 63.5905.(a)]

- a. The methods that were used to determine compliance;
- b. The results of any performance test, continuous monitoring system (CMS), and/or other monitoring procedures or methods that were conducted;
- c. The methods that will be used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods;
- d. The type and quantity of hazardous air pollutants emitted by the source (or surrogate pollutants if specified in the relevant standard), reported in units and averaging times in accordance with the test methods specified in the relevant standard;
- e. A description of the air pollution control equipment (or method) for each emission point, including each control device (or method) for each hazardous air pollutant and the control efficiency (percent) for each control device (or method); and
- f. A statement by the Permittee as to whether the source has complied with the relevant standard or other requirements.

##### B. Special Reporting for the Affected Source or Process

Excess Emissions and Permit Deviations. The Permittee shall report to the Control Officer any emissions in excess of the limits (as defined in PCC 17.04.340.A) 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 Part "A", Section XI for detailed information on these two reports). If you change any information submitted in any notification, you must submit the changes in writing to the Administrator within 15 calendar days after the change. [PCC 17.28.065 & 40 CFR 63.5905(b)]

C. Semiannual Summary Reports of Required Monitoring.

[PCC 17.12.180.A.5.a.]

The Permittee shall submit a semiannual summary report containing the following monitoring and/or recordkeeping requirements:

1. The most recent complete 12-month rolling totals (in tons) of total VOC and total HAP emissions resulting from the use of polyester resins and vinyl esters in each of the following categories:
  - a. applied manually (hand lay up).
  - b. applied with atomized spray without fluid impingement technology nozzles.
  - c. applied with atomized spray with fluid impingement technology nozzles.
  - d. filament application.
2. The most recent complete 12-month rolling totals (in tons) of total VOC and total HAP emissions resulting from the use of gel coat applications.
3. Total VOC and total HAP emissions (in tons) from all cleanup solvents used.
4. Total VOC and total HAP emissions from all paint products applied.
5. A summary of the results of the monthly inspections conducted since the last semiannual report.
6. Summary reports shall be due by January 31st (covering the period July 1st through December 31st) and July 31st (covering the period January 1st through June 30th) of each year. The first summary report due after permit issuance may not cover a 6-month period. All instances of excess emissions and deviations from permit requirements as defined in Part "A", Section XI shall be clearly identified in such reports. If there are no deviations or exceedences in a reporting period, the report shall clearly state the fact.

D. Compliance Certification Reporting:

The Permittee shall submit semiannual compliance certifications to the Control Officer. The Compliance Certification Reports are due by January 31st and July 31st of each year and shall cover the same periods as the semiannual summary reports (IV.C.6 or this Part). The first report due after permit issuance may not cover a 6-month period. (See Part "A", Section VII for detailed information on this report). [PCC 17.12.210.A.2.]

1. The compliance certification shall include the following:

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

[40 CFR 63.5895(d) & 40 CFR 5900(a)(2)]

- b. A statement that there were no deviations during that reporting period if there were no deviations from any emission limitations (emission limit and operating limit that apply and there were no deviations from the requirements for work practice standards in II.A.5 through c of this Part.

[40 CFR 63.5910(a)]

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

[40 CFR 63.5910(a)]

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

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

- d. The Permittee shall report if the source has met or exceeded the 100 tpy organic HAP emissions threshold. The Permittee shall include with this report any request for an exemption under 40 CFR 63.5805(e) as follows:

[40 CFR 63.5910(f)]

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

[40 CFR 63.5805(e)]

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

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

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

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

2. The following administrative information shall be included in each compliance certification:

[40 CFR 63.5910(c)]

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

E. Emissions Inventory Reporting:

[PCC 17.12.320]

Every source subject to a permit requirement shall complete and submit to the control officer, when requested, an annual emissions inventory questionnaire pursuant to 17.12.320 of the Pima County Code. (See Section VI of Part "A" of this permit).

**V. Testing Requirements**

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

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

- A. EPA Test Method 9 shall be used to monitor compliance with the opacity standards in II.C.2 of this Part.
- B. If the control officer has reasonable cause to believe that a manufacturer's product information sheet referenced in III.A.1 of this Part is deficient, the Control Officer may require the Permittee to conduct testing to confirm the validity of the information contained within the sheet in question.

[PCC 17.12.010]

**Southwest Fiberglass, LLC.  
Air Quality Permit # 205**

**Part C: Applicable Regulations**

**REQUIREMENTS SPECIFICALLY IDENTIFIED AS APPLICABLE**

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

*Title 40 of the Code of Federal Regulations Part 63:*

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

*State Implementation Plan, Pima County:*

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

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

*Pima County Code (PCC) Title 17, Chapter 17.16:*

17.16.030      Odor Limiting Standards  
17.16.040      Standards and Applicability (Visible Emissions).  
17.16.050      Visibility Limiting Standards  
17.16.400      Organic Solvents and Other Organic Materials  
17.16.430      Standards of Performance for Unclassified Sources  
17.20.010      Source Sampling, Monitoring, and Testing (Section A)

**Southwest Fiberglass, LLC.  
Air Quality Permit #0205**

**Part D: Equipment List**

1. Venus Chopper Gun (Fiberglass)
2. Durawinder Filament Winder
3. Venus Hoop Filament Winder
4. Venus Imregnator
5. Thompson Acetone Still (Model LS-15)
6. Acetone Still

