

REPUBLIC PLASTICS - SAN MANUEL

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1. Introduction

This permit pertains to an existing polystyrene foam manufacturing facility, operated by Republic Plastics, L.C. The SIC Code is 3086. The facility is located at 27095 South San Manuel Airport Road, San Manuel, Arizona, upon a parcel also identified by Pinal County Assessor's Parcel # 307-05-02905. The source is situated in an area classified as "attainment" for all pollutants.

Virgin polystyrene resin pellets and polystyrene resin pellets filled with talc are melted in the extruders and injected with isobutane, a blowing agent, under high pressure. The mix is then forced through the exit die and cooled. As the material exits the die and the pressure is released, the blowing agent expands forming bubbles within the extruded polystyrene. Flat sheets are formed from the material leaving the extruders, and they are placed on rolls and stored to age for three to four days. After aging, the rolls are fed through a thermoformer to mold into plates or bowls which are then stamped out leaving a trim skeleton of product. This skeleton trim is recycled into the system and mixed with pellets to be extruded again. Isobutane emissions (volatile organic compound) occur during the extrusion, storage (aging), thermoforming and stamping stages of the process. Some of the isobutane is retained by the product as it has been observed at similar facilities. Particulate emissions occur at the pellet receiver, and they are captured in a fabric filter and dropped into a dust collection drum. Also, particulate matter is emitted during the grinding of the trim skeleton. The small pieces from each grinder, called "fluff", are blown into a fluff surge hopper. The exhaust from this hopper is controlled by baghouses.

The major emissions from this facility are isobutane, a volatile organic compound (VOC), and some particulate matter (PM10) from the pellet receiver and grinder.

Permitting History

- The facility was initially permitted in 2005 (9/7/05) with permit C30851.000 which restricted VOC emissions to 95 tons per year by limiting the amount of isobutane used in the process.
- Revision "R01", issued on 5/30/06, allowed the installation of another "line" of one extruder, three thermoformers, three stamping machines and three grinders with a fluff recycling system. At this time, to be able to stay a minor source, the source agreed to substituting some of the isobutane in the process for CO₂. The permit revision increase the isobutane use limitation, and added a production limitation to ensure that VOC emissions would not exceed 97 tons per year. Since VOC emissions were calculated using a product-retention emission factor developed at another facility, this permit revision required the source to conduct an analysis to develop a site-specific emission factor. Such analysis has been finalized.
- In their semi-annual report submitted at the beginning of 2008, Republic Plastics reported having exceeded the 100 tpy "major source" threshold at least once during 2007 and notified PCAQCD that they would be submitting an application for a major source permit under CAA Title V. This permit, V20632.000, also authorizes the construction and operation of 2 more lines each including one extruder, two thermoformers, two stamping machines with grinders, a scrap grinder, and a fluff recycling system. The permit includes limitations to ensure that VOC emissions do not trigger the Prevention of Significant Deterioration (PSD) threshold of 250 tons per year.

A complete list of equipment from which emissions are allowed by this permit is given in Section 11 of this permit.

The facility includes an on-site storage tank for isobutane. The quantity of isobutane stored triggers an obligation under CAA §112.r, requiring certain planning and recordkeeping obligations. This permit

merely adopts those requirements by reference.

The facility does not otherwise fall subject to any other requirements arising under CAA §§111 or 112.

For additional information, see the "Technical Support Document" for this permit, which outlines the facility configuration, operation, emissions, permitting history and other information.

2. Listing of (*Currently Federally Enforceable*) Applicable Requirements

- 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:

7-3-1.1	Visible Emissions - General
7-3-1.2	Particulate Emissions - Fugitive Dust
7-3-1.8	Particulate Emissions - Process Industries

- 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
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- C. CAA §112r (11/15/90); 40 CFR Part 68 (7/31/98); Chemical Accident Prevention Provisions
- D. 40 CFR Part 61, Subpart M. National Emissions Standard for Asbestos
- E. CAA §608 (11/15/90); 40 CFR Part 82, Subpart F - Recycling and Emissions Reduction (9/7/95); regulations pertaining to use and handling of ozone-depleting substances.

3. Compliance Certification

- A. Compliance Plan [40 CFR §70.5(c)(8)](Code §3-1-083A.7)

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 [40 CFR §§ 70.5(c)(8), 70.6(c)(3)](Code §3-1-083A.7)

The requirements of the Notice of Violation (NOV) issued on February 15, 2008 will be met once this permit is issued.

4. Authority to Construct [*Federally enforceable - Code §§3-1-010, 3-1-030, 3-1-040 (as amended 10/12/95) approved as a SIP Element at 61 FR 15717 (4/9/96)*]

- A. General

Emissions from this facility, specifically the equipment described in "Equipment Schedule"

section below, and the operating configuration as defined below and more fully described in the application for permit, fall subject to the enforceable limitations identified throughout 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, this permit constitutes authority to construct and operate such equipment.

B. Equipment Authorized Under Authority to Construct Provided by This Permit (Code §3-1-081)

This permit authorizes installation of the following equipment in the “Equipment Schedule “ section of this permit, with that installation authority subject to the corresponding installation and operating limitations set forth below in this permit:

1. 2 extruders, 1600 lb/hr capacity each;
2. 4 thermoformers and stamping machines with grinders;
3. 2 scrap grinders; and,
4. 2 fluff recycle systems with surge hoppers (with 2 baghouses each).

5. Synthetic Minor Limitations - VOCs [*Federally enforceable provision, pursuant to Code §3-1-084 (8/11/94)*] (Code §3-1-081.A)

A. Emission Cap

Permittee shall limit emissions, in any consecutive twelve-month period, such that emissions of VOCs do not exceed 250 tons.

B. Production Limitations

To stay within the preceding emission cap for VOC emissions, and thereby also avoid classification, and regulation, as a major source within the meaning of Code §3-3-203, Permittee shall:

1. Permittee shall produce no more than 22,867 tons of foam sheet in any 12 month period, and no more than 2,477 tons per month.
2. Permittee shall produce no more than 15,778 tons of foam product in any 12 month period, and no more than 1,709 tons per month.
3. For the inkjet printer, Permittee shall only use water-based inks.

These operational limitations will limit the potential emissions of VOCs to approximately 248 tons per year.

6. Emission Limitations and Controls

A. Applicable Limitations (Code §3-1-082)

Where different standards or limitations apply under this permit, the most stringent combination

shall prevail and be enforceable.

B. Allowable Emissions

1. General Limitation [*Code § 3-1-081.A.2. (as amended 10/12/95)*]

The owner/operator ("Permittee") is authorized to discharge or cause to discharge into the atmosphere those emissions of air contaminants as set forth in this permit. Unless exempted under Code §3-2-180, Permittee shall not use any material, process, or equipment not identified in this permit which will cause emissions of any regulated air pollutant in excess of the 5.5 pound-per-day *de minimis* amount, unless authorized by a permit revision as allowed under this permit, or by a separate permit issued by the District or other competent authority.

2. Insignificant Activities (*Code §§1-3-140.74a, 3-1-040.B.2.a.i, 3-1-050*)

Apart from the authority of this permit, Permittee is authorized to discharge or cause to discharge into the atmosphere emissions from insignificant activities, as defined in Code §1-3-140.74a.

C. Particulate Emissions - Opacity Limits

1. SIP Limitation - [*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)*]

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.

2. 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 60, Appendix A.

D. Particulate Emissions - Control of Fugitive Dust [*Currently federally enforceable pursuant to PGAQCD Reg. 7-3-1.2 (3/31/75) approved as a SIP element at 43 FR 50531 (11/15/78)*]

Permittee shall not cause, suffer, allow or permit a building or its appurtenances or open area to be used, constructed, repaired, altered or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Particulate emissions shall be kept to a minimum by such measures as wetting down, covering, landscaping, paving, treating or by other reasonable means.

E. Risk Management Program and Plan (CAA §112r), 40 CFR 68)

1. Permittee shall submit a complete risk management plan ("RMP"), or a revised RMP, to the District or other state or local agency designated by the state for this purpose, by such deadline as may be established under 40 CFR Part 68. The RMP submittal shall include a certification that the plan is complete and accurate;

2. Permittee shall submit any additional information required for completeness;

3. Permittee shall submit Annual certification of implementation of the risk management program as described by the RMP.

F. General Maintenance Obligation (Code §§3-1-081.E., 8-1-030.A.3)

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.A.8, 7-1-060)

Permittee shall comply with Code §§7-1-030.A.8 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 applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction.

7. Compliance Demonstration

A. Regular Emissions Monitoring

1. VOC monitoring [*Federally enforceable provision, pursuant to Code §3-1-084 (8/11/94)*]

a. Production Rates

Within ten days of the end of every calendar month, Permittee shall log the aggregate amount of foam sheet and foam product produced in the previous month to determine whether it complies with the monthly and annual limits defined above.

b. VOC emission cap

1. Within ten days of the end of every calendar month, using the total production rates from subsection a. above, Permittee shall calculate and keep records of the 12-month rolling total VOC (isobutane) emissions.
2. If the calculations required by the previous paragraph show that VOC emissions have reached 200 tons, Permittee shall begin calculating VOC emissions as follows:
 - i. on a weekly basis until emissions are brought down below 200 tons, and

- ii. On a daily basis once emissions reach 240 tons.

The weekly and monthly calculation schedule can be resumed once emissions are below 240 tons and 200 tons respectively.

- 3. VOC emissions shall be calculated using the following formula:

$$\text{VOC (tpy)} = \text{isobutane used/yr} - \text{isobutane retained in product/yr}$$

For purposes of these calculations, and any other compliance-related calculations, Permittee will use an isobutane retention factor of 0.022 lb of isobutane retained/pound of final product, as determined by the on-site analysis conducted in 2006-2007.

- 2. Particulate Matter monitoring - Inspections (Code §3-1-083)

To verify effective control of the baghouse and fabric filter, they shall be checked for visible emissions at least once daily during operations.

If visible emissions are observed during any of the checks, they shall be inspected and cleaned or repaired as necessary. Permittee shall maintain records of these inspections, the cause for the visible emissions and the corrective measures taken.

- B. Recordkeeping [*Federally enforceable provision, pursuant to Code §3-1-084 (8/11/94)*] (Code §3-1-083)

Permittee shall maintain records of:

- 1. All data and calculations used to determine VOC emissions.
- 2. All information required pursuant to any federally enforceable provision of this permit, recorded in a permanent form suitable for inspection.
- 3. The occurrence and duration of any start-up, shutdown or malfunction in the operation of the permitted facility or any air pollution control equipment. For purposes of this provision, a "shut-down" means a cessation of operations at the entire facility for more than seven days, and a "start-up" constitutes the reactivation of the facility after a "shut-down."

- C. Semi-Annual Compliance Reporting [*Federally enforceable provision, pursuant to Code §3-1-084 (8/11/94)*] (Code §3-1-083.A)

In order to demonstrate compliance with the provisions of this permit, the Permittee shall submit a semiannual report containing a summary of the information required to be recorded pursuant to this permit, which summary shall clearly show that Permittee has complied with the operational and emissions limitations under this permit. All instances of deviations from permit requirements shall be clearly identified in such reports. For brevity, such deviation reports may incorporate by reference any written supplemental upset reports filed by Permittee during the reporting period. The report shall be submitted to the District within 30 days after the end of each calendar half. Appendix A of this permit is a form which may be used for the report.

- D. Annual Regular Compliance/Compliance Progress Certification (Code §3-1-083.A.4.)

Permittee shall annually submit a certification of compliance with the provisions of this permit. The certification shall:

1. Be signed by a responsible official, namely the proprietor, a general partner, the president, secretary, treasurer or vice-president of the corporation, 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.

8. Other Reporting Obligations

- A. Deviations from Permit Requirements (Code §3-1-81.A.5.b.)

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 ten days of the deviation unless earlier notification is required by the provisions of this permit.

- B. Annual emissions inventory [Code §3-1-103. (Nov. '93)]

Since this source would be subject to an ADEQ permitting requirement, Permittee shall complete and submit to the District an annual emissions inventory, disclosing actual emissions for the preceding calendar year. 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.

9. Fee Payment (Code §3-7-600.)

As an essential obligation under this permit, a permit fee shall be assessed by the District and paid by Permittee in accord with the provisions of Code Chapter 3, Article 7, as they may exist at the time the fee is due. The permit fee shall be due annually on or before the anniversary date of the issuance of an individual permit, or formal grant of approval to operate under a general permit, or at such other time as may be designated now or hereafter by rule. The District will notify the Permittee of the amount to be due, as well as the specific date on which the fee is due.

10. General Conditions

- A. Term (Code §3-1-089)

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

B. Basic Obligation (Code §3-1-081.)

Permittee shall operate in compliance with all conditions of this permit, the Pinal County Air Quality Control District ("the District") Code of Regulations ("Code"), and 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 CAA.

C. Duty to Supplement Application (Code §§3-1-050.H., 3-1-081.A.8.e., 3-1-087.A.1.c., 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 aware 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 (Code §§ 3-1-132, 8-1-050)

Authorized representatives of the District shall, upon presentation of proper credentials and a showing that the District representative is equipped with certain safety equipment, namely a hard hat, 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

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 (Code §3-1-140)

The Director of the District ("Director") may revoke this permit for cause, 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 (Code § 3-1-175.)

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 inquiry, the statements and information in the document are true, accurate, and complete.

I. Renewal of Permit (Code §3-1-050)

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 (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 (Code § 3-1-102.)

1. Compliance with the terms of this permit shall be deemed compliance with any applicable requirement identified in this permit.
2. 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.

L. Permit Revisions (Code Chapter 3, Article 2)

1. This permit may be revised, reopened, revoked and reissued, or terminated for cause. Other than as expressly provided in Code Chapter 3, Article 2, 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. Should this source become subject to a standard promulgated by the Administrator pursuant to CAA §112(d), then 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. (Code §3-1-050.C.5)
5. Revision to Permit Provisions Designated as Federally Enforceable Pursuant to Code §3-1-084 [*Federally enforceable provision, pursuant to Code §3-1-084 (8/11/94)*]

As an express condition of preserving the federal enforceability of any provision of this permit designated "federally enforceable" pursuant to Code §3-1-084, Permittee shall not make any facility allowed change that would contravene such provision, until thirty (30) days after the Permittee has previously furnished notice of the proposed change to the District and to the Administrator, to thereby allow the Administrator opportunity to comment upon the continued "federal enforceability" of the subject provision after the proposed change.

M. Permit Re-opening (Code §3-1-087.)

If the EPA objects to the "federally enforceable" designations under this permit, insofar as they are based on Code §3-1-084, then this permit may be subject to a Title V applicability determination after the EPA approves the District's Title V operating permit program. If a Title V permit is required, this permit will need to be re-opened, will be subject to EPA review and public review, and may require additional revision. While the District will notify Permittee if the EPA objects to any of those federally enforceable designations under Code §3-1-084, the Permittee bears the responsibility of determining when-and-or-if such a Title V permit application must be filed.

N. Record Retention (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 (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 (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

- 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.

11. Facility Specific Data

A. Equipment

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

- 1. (4) - Davis Standard Extruders, 1600 lb/hr capacity each.
- 2. (10) - Irwin Research Thermoformers, 65 foot per minute of sheet.
- 3. (2) - Premier Pneumatic Pellet Unloading/Vacuum Systems, equipped with Fabric Filter
- 4. Talc-filled Pellet Receiver Baghouse
- 5. (8) - Skeleton Surge Hopper Baghouses
- 6. (10) - Stamping Machines w/grinder each.
- 7. (4) - Irwin Research Scrap Grinder, 100 lb/hr
- 8. 30,000 gallon pressurized isobutane tank

Appendix A

Semi-annual Report

Permit V20632.000

Abstract

This constitutes a semi-annual report, documenting emissions and use of emission-generating materials during the subject reporting period.

Facility - Republic Plastics San Manuel Foam Plant
27095 South San Manuel Airport Rd, San Manuel, AZ

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

Material Usage/Produced & VOC Emissions

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec
Foam Sheet Produced (tons)												
Foam Product Produced (tons)												
VOC emissions (tons)												

NOTE: If at any point during the reporting period, Permittee had to conduct weekly or daily VOC calculations, as required by the permit, a summary of those calculations shall be attached to their semi-annual report.

Emissions Calculations

Did all monthly and weekly calculations of the rolling average of VOC emissions pursuant to §7.A.1.b show compliance with the permit limits?
..... Yes __ No __

Operational Inspections

Have the required fabric filter and baghouse inspections and recordkeeping been conducted pursuant to §7.A.2? 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 _____

Title _____

Date _____

Mail to - Pinal County Air Quality Control District
PO Box 987

Florence, AZ 85232