

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

33 N. Stone Avenue, Suite 700 • Tucson, Arizona 85701 • Phone: (520) 243-7400

**AIR QUALITY OPERATING PERMIT**

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

**ISSUED TO**

**CHIRCO GRANITE FABRICATION INC.  
3238 E. COLUMBIA STREET  
TUCSON, ARIZONA 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 Parts A & B AND Attachments 1 & 2.

PERMIT NUMBER **6059**

PERMIT CLASS **I**

ISSUED: \_\_\_\_\_

EXPIRES: \_\_\_\_\_

\_\_\_\_\_  
SIGNATURE

*Mukonde Chama, P.E. Air Permits Supervisor, PDEQ*  
\_\_\_\_\_  
TITLE

**SUMMARY**

This air quality operating permit is issued to Chirco Granite Fabrication Inc., (herein known as the facility) for their cultured marble / reinforcement plastics composites production facility located at 3238 E. Columbia Street, Tucson, Arizona 85714. The facility utilizes the following production techniques: open molding, non-atomized spraying and hand layup.

Affected Emission Source Classification: Class I stationary source subject to the provisions of the Code of Federal Regulations (CFR) - specifically 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.

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 in their July 27, 2009 new source permit application, 40 CFR 63 Subpart WWWW and material usage calculations detailed in correspondence dated October 7, 2009.

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 17.12.255.A.3).

<b>Pollutant</b>	<b>Potential To Emit (Tons Per Year)</b>
Volatile Organic Compounds (VOC)	32.5
Total Hazardous Air Pollutants (HAPs)	21.6

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

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## **PART A: GENERAL PROVISIONS**

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

### **I. PERMIT EXPIRATION AND RENEWAL**

[PCC 17.12.180.A.1 & PCC 17.12.160.D.1]

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

### **II. COMPLIANCE WITH PERMIT CONDITIONS**

[PCC 17.12.180.A.8.a & b]

- A. The Permittee shall comply with all conditions of this permit including all applicable requirements of Arizona air quality statutes A.R.S. Title 49, Chapter 3, and Pima County air quality rules. Any permit noncompliance is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application. In addition, noncompliance with any federally enforceable requirement constitutes a violation of the Clean Air Act.
- B. It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

### **III. PERMIT REVISION, REOPENING, REVOCATION AND REISSUANCE, OR TERMINATION FOR CAUSE**

[PCC 17.12.180.A.8.c & PCC 17.12.270]

- A. The permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a permit revision, revocation and reissuance, or termination; or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- B. The permit shall be reopened and revised under any of the following circumstances:
  - 1. Additional applicable requirements under the Clean Air Act become applicable to a major source with a remaining permit term of three or more years. Such a reopening shall be completed 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.B. Any permit reopening required pursuant to this paragraph shall comply with provisions in PCC 17.12.280 for permit renewal and shall reset the five-year permit term.
  - 2. Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the 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 Part A shall not result in the resetting of the five-year permit term.

#### **IV. POSTING OF PERMIT**

[PCC 17.12.080]

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

#### **V. FEE PAYMENT**

[PCC 17.12.180.A.9 & PCC 17.12.510]

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

#### **VI. ANNUAL EMISSIONS INVENTORY QUESTIONNAIRE**

[PCC 17.12.320]

- A. When requested by the Control Officer, the Permittee shall complete and submit an annual emissions inventory questionnaire. The questionnaire is due by March 31 or ninety days after the Control Officer makes the inventory form available, whichever occurs later, and shall include emission information for the previous calendar year. These requirements apply whether or not a permit has been issued and whether or not a permit application has been filed.
- B. The questionnaire shall be on a form provided by or approved by the Control Officer and shall include the information required by PCC 17.12.320.

#### **VII. COMPLIANCE CERTIFICATION**

[PCC 17.12.220.A.2]

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

- A. The compliance certification shall include the following:
  1. Identification of each term or condition contained in the permit including emission limitations, standards, or work practices that are the basis of the certification.
  2. Identification of the method(s) or other means used by the Permittee for determining the compliance status of the source with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required under the monitoring, related recordkeeping and reporting sections of this permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of

the Clean Air Act, which prohibits knowingly making a false certification or omitting material information.

3. The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall identify each deviation and take it into account in the compliance certification.
  4. For emission units subject to 40 CFR 64, the certification shall also identify as possible exceptions to compliance any period during which compliance is required and in which an excursion or exceedance defined under 40 CFR 64 occurred.
  5. A progress report on all outstanding compliance schedules submitted pursuant to PCC 17.12.220; and
  6. Other facts the Control Officer may require to determine the compliance status of the facility.
- B. A copy of all compliance certifications for Class I permits shall also be submitted to the EPA Administrator. The address for the EPA Administrator is:

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

#### **VIII. CERTIFICATION OF TRUTH, ACCURACY AND COMPLETENESS**

[PCC 17.12.220.A.3]

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

#### **IX. INSPECTION AND ENTRY**

[PCC 17.12.220.A.4]

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

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

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

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

**XI. EXCESS EMISSIONS, PERMIT DEVIATIONS, AND EMERGENCY REPORTING** [PCC 17.12.040]

**A. Excess Emissions Reporting** [PCC 17.12.040]

**1. Excess emissions shall be reported as follows:**

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

i. Notification by telephone or facsimile within 24 hours of the time the Permittee first learned of the occurrence of excess emissions that includes all available information from PCC 17.12.040.B. The number to call to report excess emissions is **520-243-7400**. The facsimile number to report excess emissions is **520-838-7432**.

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

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

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

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

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

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

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

v. The nature and cause of the emissions;

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

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

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

B. Permit Deviations Reporting

[PCC 17.12.180.A.5.b]

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

C. Emergency Provision

[PCC 17.12.180.E]

1. An "Emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, that require immediate corrective action to restore normal operation and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emission attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.
2. An emergency constitutes an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the conditions of PCC 17.12.180.E.3 are met.
3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
  - a. An emergency occurred and that the Permittee can identify the cause or causes of the emergency;
  - b. At the time of the emergency, the permitted facility was being properly operated;
  - c. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
  - d. The Permittee submitted notice of the emergency to the Control Officer by certified mail, hand delivery, or facsimile transmission within two working days of the time when emission limitations were exceeded due to the emergency. This notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective action taken.

4. In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.

D. Compliance Schedule

[ARS § 49-480.F.3 & 5]

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

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

[PCC 17.12.035]

1. Applicability

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

- a. Promulgated pursuant to Sections 111 or 112 of the Clean Air Act,
- b. Promulgated pursuant to Titles IV or VI of the Clean Air Act,
- c. Contained in any Prevention of Significant Deterioration (PSD) or New Source Review (NSR) permit issued by the U.S. E.P.A., or
- d. Included in a permit to meet the requirements of PCC 17.16.590.A.5.

2. Affirmative Defense for Malfunctions

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

- a. The excess emissions resulted from a sudden and unavoidable breakdown of process equipment or air pollution control equipment beyond the reasonable control of the operator;
- b. The air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
- c. If repairs were required, the repairs were made in an expeditious fashion when the applicable emission limitations were being exceeded. Off-shift labor and overtime were utilized where practicable to ensure that the repairs were made as expeditiously as possible. If off-shift labor and overtime were not utilized, the

owner or operator satisfactorily demonstrated that the measures were impracticable;

- d. The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;
- e. All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;
- f. The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance;
- g. During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in PCC Chapter 17.08 that could be attributed to the emitting source;
- h. The excess emissions did not stem from any activity or event that could have been foreseen and avoided, or planned, and could not have been avoided by better operations and maintenance practices;
- i. All emissions monitoring systems were kept in operation if at all practicable; and
- j. The Permittee's actions in response to the excess emissions were documented by contemporaneous records.

3. Affirmative Defense for Startup and Shutdown

- a. Except as provided in XI.E.3.b of Part A, and unless otherwise provided for in the applicable requirement, emissions in excess of an applicable emission limitation due to startup and shutdown shall constitute a violation. The Permittee of a source with emissions in excess of an applicable emission limitation due to startup and shutdown has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the owner or operator of the source has complied with the reporting requirements of XIII.B of Part A and has demonstrated all of the following:
  - i. The excess emissions could not have been prevented through careful and prudent planning and design;
  - ii. If the excess emissions were the result of a bypass of control equipment, the bypass was unavoidable to prevent loss of life, personal injury, or severe damage to air pollution control equipment, production equipment, or other property;
  - iii. The source's air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
  - iv. The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;

- v. All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;
  - vi. During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in PCC Chapter 17.08 that could be attributed to the emitting source;
  - vii. All emissions monitoring systems were kept in operation if at all practicable; and
  - viii. The Permittee's actions in response to the excess emissions were documented by contemporaneous records.
- b. If excess emissions occur due to a malfunction during routine startup and shutdown, then those instances shall be treated as other malfunctions subject to XI.E.2 of Part A.
4. Affirmative Defense for Malfunctions during Scheduled Maintenance
- If excess emissions occur due to a malfunction during scheduled maintenance, then those instances will be treated as other malfunctions subject to XI.E.2 of Part A.
5. Demonstration of Reasonable and Practicable Measures
- For an affirmative defense under XI.E.2 or 3 of Part A, the Permittee of the source shall demonstrate, through submission of the data and information required by XI.E.1 – 5 and XIII.B of Part A, that all reasonable and practicable measures within the owner or operator's control were implemented to prevent the occurrence of the excess emissions.

## **XII. RECORD KEEPING REQUIREMENTS**

[PCC 17.12.180.A.4]

- A. The Permittee shall keep records of all required monitoring information including recordkeeping requirements established pursuant to PCC 17.12.190, where applicable, for the following:
1. The date, place as defined in the permit, and time of sampling or measurements;
  2. The date(s) analyses were performed;
  3. The name of the company or entity that performed the analyses;
  4. A description of the analytical techniques or methods used;
  5. The results of such analyses; and
  6. The operating conditions as existing at the time of sampling or measurement.
- B. The Permittee shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

- C. All required records shall be maintained either in an unchangeable electronic format or in a handwritten logbook utilizing indelible ink.

### **XIII. REPORTING REQUIREMENTS**

[PCC 17.12.180.A.5]

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

- A. Compliance certifications pursuant to VII of Part A.
- B. Excess emissions; permit deviations, and emergency reports in accordance with XI of Part A.
- C. Performance test results in accordance with XVII.F of Part A.
- D. Reporting requirements are listed in Part B of this permit.

### **XIV. DUTY TO PROVIDE INFORMATION**

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

- A. The Permittee shall furnish to the Control Officer, within a reasonable time, any information that the Control Officer may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the Control Officer copies of records required to be kept by the permit. For information claimed to be confidential, the Permittee, for Class I sources, shall furnish an additional copy of such records directly to the Administrator along with a claim of confidentiality.
- B. If the Permittee has failed to submit any relevant facts or if the Permittee has submitted incorrect information in the permit application, the Permittee shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. In addition, an applicant shall provide additional information as necessary to address any requirements that become applicable to the source after the date it filed a complete application but prior to release of a proposed permit.

### **XV. PERMIT AMENDMENT OR REVISION**

[PCC 17.12.245, PCC 17.12.255 & PCC 17.12.260]

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

- A. Administrative Permit Amendment (PCC 17.12.245);
- B. Minor Permit Revision (PCC 17.12.255);
- C. Significant Permit Revision (PCC 17.12.260).

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

**XVI. FACILITY CHANGES ALLOWED WITHOUT PERMIT REVISIONS**

[PCC 17.12.230]

- A A facility with a Class I permit may make changes without a permit revision if all of the following apply:
1. The changes are not modifications under any provision of Title I of the Clean Air Act (Air Pollution Prevention and Control) or under modifications as defined in A.R.S. 49-401.01;
  2. The changes do not exceed the emissions allowable under the permit whether expressed therein as a rate of emissions or in terms of total emissions;
  3. The changes do not violate any applicable requirements or trigger any additional applicable requirements;
  4. The changes satisfy all requirements for a minor permit revision under PCC 17.12.255; and
  5. The changes do not contravene federally enforceable permit terms and conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements.
- B. The substitution of an item of process or pollution control equipment for an identical or substantially similar item of process or pollution control equipment shall qualify as a change that does not require a permit revision, if the substitution meets all of the requirements of XVI.A, D and E of Part A.
- C. Except for sources with authority to operate under general permits, permitted sources may trade increases and decreases in emissions within the permitted facility, as established in the permit under PCC 17.12.180.A.12 if an applicable implementation plan provides for the emissions trades, without applying for a permit revision and based on the seven working days' notice prescribed in XVI.D of Part A. This provision is available if the permit does not provide for the emissions trading as a minor permit revision.
- D. For each change under XVI.A through C of Part A, a written notice, by certified mail or hand delivery, shall be received by the Control Officer and the Administrator a minimum of seven (7) working days in advance of the change. Notifications of changes associated with emergency conditions, such as malfunctions necessitating the replacement of equipment, may be provided less than 7 working days in advance of the change but must be provided as far in advance of the change, or if advance notification is not practicable as soon after the change as possible.
- E. Each notification shall include:
1. When the proposed change will occur;
  2. A description of the change;
  3. Any change in emissions of regulated air pollutants;
  4. The pollutants emitted subject to the emissions trade, if any;

5. The provisions in the implementation plan that provide for the emissions trade with which the source will comply and any other information as may be required by the provisions in the implementation plan authorizing the trade;
  6. If the emissions trading provisions of the implementation plan are invoked, then the permit requirements with which the source will comply; and
  7. Any permit term or condition that is no longer applicable as a result of the change.
- F. The permit shield described in PCC 17.12.310 shall not apply to any change made under XVI.A through C of this Part. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the implementation plan authorizing the emissions trade.
- G. Except as otherwise provided for in the permit, making a change from one alternative operating scenario to another as provided under PCC 17.12.180.A.11 shall not require any prior notice under XVI Part A.
- H. Notwithstanding any other part of this Section, the Control Officer may require a permit to be revised for any change that when considered together with any other changes submitted by the same source under the provisions of PCC 17.12.230 over the term of the permit, do not satisfy XVI.A of this Part.

## **XVII. TESTING REQUIREMENTS**

[PCC 17.12.050]

### **A. Operational Conditions During Testing**

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

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

### **C. Test Plan**

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

### **D. Stack Sampling Facilities**

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

1. Sampling ports adequate for test methods applicable to the facility;
2. Safe sampling platform(s);

3. Safe access to sampling platform(s); and,
4. Utilities for sampling and testing equipment.

E. Interpretation of Final Results

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

F. Report of Final Test Results

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

**XVIII. PROPERTY RIGHTS**

[PCC 17.12.180.A.8.d]

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

**XIX. SEVERABILITY CLAUSE**

[PCC 17.12.180.A.7]

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

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

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

**XXI. ASBESTOS REQUIREMENTS (Demolition/ Renovation)**

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

**XXII. STRATOSPHERIC OZONE DEPLETING SUBSTANCES**

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

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## PART B: SPECIFIC PROVISIONS

[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. The facility has to meet the "maximum achievable technology" ("MACT") standard 40 CFR 63 Subpart WWWW – Reinforced Plastic Composites Production, Title 17 of the Pima County Code (PCC), 17.16.400, "Organic solvents and other organic materials", PCC 17.16.430, "Standards of performance for unclassified sources" apply, as do some provisions of the Pima County SIP. A comprehensive list of applicable requirements may be found in Part C.

A. This is a new source five-year Title V operating permit for a Class I source in response to a permit application received July 24, 2009, and material usage calculations detailed in correspondence dated October 7, 2009.

B. Affected Emission Source or Process: This Part B contains specific operating requirements for the manufacture of reinforced plastic composites.

The source does not have any centrifugal casting or continuous lamination/casting operations (as defined in the MACT and emits less than 100 TPY of hazardous air pollutants (HAPs).

C. The source constitutes a "major emitting source" for a single HAP.

D. Affected Emission Source Classification: This is a **Class I**, new major stationary source of a single HAP (styrene), and a true minor source for all other criteria pollutants.

### II. EMISSION LIMITS & STANDARDS

[PCC 17.12.180.A.2]

#### A. Reinforced Plastic Composites Production

1. The Permittee shall limit the use of resins and gels coats to no more than that listed in the following table:

[PCC 17.12.190]

**[Material Permit Condition]**

Product Type	Maximum Usage (lbs) per 12-Month Period
Resins	219,000
Gel Coats	10,000
Acetone	2,200

2. The Permittee shall not use any polyester resin product containing more than \*71.4% by weight of styrene (CAS Number 100425).

[40 CFR 63.5810(a), Table 3 & PCC 17.12.190]

**[Federally Enforceable Condition]**

\* % by weight reflects an adjusted max organic %HAP content to demonstrate compliance with Table 3 emission limit. See PTE calculations for additional reference and derivation.

3. The Permittee shall not use any gel coat product containing more than \*69.1% by weight of styrene (CAS Number 100425).

[40 CFR 63.5810(a), Table 3 & PCC 17.12.190]

**[Federally Enforceable and Material Permit Condition]**

4. Resin and Gel coat Delivery System Requirements

The Permittee shall operate only resin and gel coat delivery systems utilizing "fluid impingement technology" to produce a non-atomized stream. [PCC 17.12.190]

**[Federally Enforceable and Material Permit Condition]**

5. Work Practice Standards

a. The Permittee shall be in compliance at all times with the work practice standards in Condition II.A.5.b of the Specific Conditions, as well as the organic HAP content limits in II.A.2 and II.A.3 of the Specific Conditions that the Permittee is meeting without the use of add-on controls. [40 CFR 63.5835(a)]

**[Federally Enforceable and Material Permit Condition]**

b. The Permittee shall comply with the following work practice standards:

[40 CFR 63 Subpart WWWW, Table 4 & PCC 17.12.190]

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

- i. For cleaning operations, the Permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP-containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin;
- ii. For HAP-containing materials storage operations, the Permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety;
- iii. For all mixing operations, the Permittee shall use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation;
- iv. For all mixing operations, the Permittee shall close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety;
- v. For all mixing operations, the Permittee shall keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels; and
- vi. Notwithstanding Conditions II.A.3.b.iii through II.A.3.b.v of the Specific Conditions, containers of 5 gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e. they are actually being used to apply resin).

B. All Operations

1. Operation and Maintenance Requirements

At all times, including periods of startup, shutdown, and malfunction, the Permittee must operate and maintain all operations in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the Permittee reduce emissions from the affected source to the greatest extent which is consistent with safety and good air pollution control practices. The general duty to minimize emissions during a period of startup, shutdown, or

malfunction does not require the Permittee to achieve emission levels that would be required by the applicable standard at other times if this is not consistent with safety and good air pollution control practices, nor does it require the Permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved.

[40 CFR 63.5835(c), 40 CFR 63.6(e)(1)(i) & PCC 17.12.180.A.2]

**[Federally Enforceable and Material Permit Condition]**

2. Odor Limiting Standard

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

[SIP Rule 344 & PCC 17.16.030]

3. Opacity Standard

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%.

[SIP Rule 321 & PCC 17.16.040]

4. Visibility Limiting Standard

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.

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

5. Material Handling

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]

6. Control of Air Pollution

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]

7. Add On Control Devices

The Permittee shall develop a written startup, shutdown, and malfunction plan according to the provisions in 40 CFR 63.6(e)(3) for any organic HAP emissions limits met using an add-on control.

[40 CFR 63.5835(d)]

**[Federally Enforceable Condition]**

### III. MONITORING REQUIREMENTS

[PCC 17.12.180.A.3]

#### A. Reinforced Plastic Composites Production

1. The Permittee shall demonstrate compliance with the product usage requirement in II.A.1 of the Specific Conditions by recording (within 10 days of the end of the month) the following:
  - a. The inventory/usage of resins, gel coats and acetone used each month.
  - b. Yearly totals of resin, gel coat and acetone used for the most recent 12-consecutive month period. These shall be kept by adding the totals from III.A.1.a of the Specific Conditions to the record of the previous 11 consecutive months.
2. The Permittee shall demonstrate compliance with the organic HAP content limitations in II.A.2 and II.A.3 of the Specific Conditions by maintaining 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]

**[Federally Enforceable Condition]**

  - 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)]

**[Federally Enforceable Condition]**
  - b. If the organic HAP content is provided by the material supplier or manufacturer as a range, the Permittee shall 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 the Permittee shall use the measured organic HAP content to demonstrate compliance. [40 CFR 63.5797(b)]

**[Federally Enforceable Condition]**
  - c. If the organic HAP content is provided as a single value, the Permittee 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 the Permittee may still 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 the Permittee shall use the measured organic HAP content to demonstrate compliance. [40 CFR 63.5797(c)]

**[Federally Enforceable Condition]**
  - 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]

3. The Permittee must monitor and collect data as specified in III.A.3.a through III.A.3.d of the Specific Conditions. [40 CFR 60.5895(b)]  
**[Federally Enforceable Condition]**
- a. Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), you must conduct all monitoring in continuous operation (or collect data at all required intervals) at all times that the affected source is operating. [40 CFR 60.5895(b)(1)]  
**[Federally Enforceable Condition]**
- b. The Permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities for purposes to this monitoring subsection, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. [40 CFR 60.5895(b)(2)]  
**[Federally Enforceable Condition]**
- c. At all times, the Permittee must maintain necessary parts for routine repairs of the monitoring equipment. [40 CFR 60.5895(b)(3)]  
**[Federally Enforceable Condition]**
- d. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring equipment to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. [40 CFR 60.5895(b)(4)]  
**[Federally Enforceable Condition]**
4. The Permittee must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if you are meeting any organic HAP emissions limits based on an organic HAP emissions limit in Tables 3 or 5 to Subpart WWWW. Resin use records may be based on purchase records if you can reasonably estimate how the resin is applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier. [40 CFR 60.5895(c)]  
**[Federally Enforceable Condition]**
5. Resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission as defined in 40 CFR 63.5810(a). However, you must retain the records of resin and gel coat organic HAP content, and you must include the list of these resins and gel coats and identify their application methods in your semiannual compliance reports. [40 CFR 60.5895(d)]  
**[Federally Enforceable Condition]**

**B. All Operations**

At least once during each calendar month (approximately every 30 days), the Permittee shall conduct an on site inspection. The inspection shall be conducted while resins or gel coats are being applied and shall address the following items: [40 CFR 63.5805(c) and Table 4]

1. That the cleanup solvent used contains no VOC or HAP constituents (except as provided in II.A.5.b.i of the Specific Conditions).
2. That all storage vessels containing VOC or HAP are completely covered (except as provided in II.A.5.b.ii of the Specific Conditions).

3. That covers on resin and gel coat mixers have no visible gaps (except as provided in II.A.5.b.iii of the Specific Conditions).
4. That odors and visible emissions are not observed outside the production buildings.
5. That architectural coatings used on site are not photo-chemically reactive.
6. Monitoring records of this monthly inspection shall include, at a minimum, the date of the inspection, the name and signature of the person conducting the inspection, the inspection results of each item checked (specifically items III.B.1.through 5) with discrepancies noted, and any corrective action taken.

#### IV. RECORDKEEPING REQUIREMENTS

A. The Permittee shall keep the following records: [PCC 17.12.180.A.4]

1. The inventory/usage of resins and gel coats used each month.
2. Yearly totals of resin/gel coat used for the most recent 12-consecutive month period.
3. The monthly inventory/usage of resins used in each operation type.
4. Yearly totals of resin used in each operation type for the most recent 12-consecutive month period.
5. 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)]  
**[Federally Enforceable Condition]**
6. The records in 40 CFR 63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction. [40 CFR 63.5915(a)(2)]  
**[Federally Enforceable Condition]**
7. Records of performance tests, design, and performance evaluations (if required) as stipulated in 40 CFR 63.10(b)(2). [40 CFR 63.5915(a)(3)]  
**[Federally Enforceable Condition]**
8. A certified statement that the Permittee is in compliance with the work practice standards in II.A.5.b of the Specific Conditions. [40 CFR 63.5915(d)]  
**[Federally Enforceable Condition]**
9. The monitoring records of the monthly inspection as identified in III.B. of this permit.

B. Format of Records

1. 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)]  
**[Federally Enforceable Condition]**
2. 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)]  
**[Federally Enforceable Condition]**

3. 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)]

**[Federally Enforceable Condition]**

4. 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)]

**[Federally Enforceable Condition]**

## V. REPORTING REQUIREMENTS

[PCC 17.12.180.A.5 & PCC 17.12.210]

### A. Reinforced Plastic Composites Production

#### Semiannual Reports of Required Monitoring

[PCC 17.12.180.A.5.a]

The Permittee shall submit a semiannual summary report of all required monitoring including 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 resins in the open molding operation.
2. The most recent complete 12-month rolling totals (in tons) of total VOC and total HAP emissions resulting from the use of the gel coat open molding application.
3. A summary of the results of the monthly inspections conducted since the last semiannual report
4. 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 exceedances in a reporting period, the report shall clearly state the fact.

### B. Compliance Certification Reporting

The Permittee shall submit to the Control Officer semiannual compliance certification reports on the following schedule:

[40 CFR 63.9(h)(3), 40 CFR 63.5910(a), (b) and (h)]

**[Federally Enforceable Conditions]**

1. Each compliance certification report shall cover the semiannual reporting period from January 1 through June 30 of the semiannual reporting period from July 1 through December 31; and
2. Each compliance certification report shall be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
3. The compliance certification report shall include the following:
  - a. A statement that there were no deviations during that reporting period if there were no deviations from any applicable emission limitation and/or work practice standard.

- b. 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(d)]  
**[Federally Enforceable Condition]**
- 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 applicable), as applicable, and the corrective action taken.
4. The following administrative information must be included in each compliance certification report:  
**[Federally Enforceable Conditions]**
- a. The company name and address. [40 CFR 63.5910(c)(1)]
  - b. 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. [40 CFR 63.5910(c)(2)]
  - c. Date of the report and beginning and ending dates of the reporting period. [40 CFR 63.5910(c)(3)]
  - d. If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply to you, and there are no deviations from the requirements for work practice standards in II.A.5.b of the Specific Conditions, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period. [40 CFR 63.5910(c)(5)]
5. For each deviation from an organic HAP emissions limitation (i.e. emissions limit and operating limit) and for each deviation from the requirements for work practice standards:  
[40 CFR 63.10(d)(1), 40 CFR 63.5900(b), 40 CFR 63.5910(a), (c), (d) and (h)]  
**[Federally Enforceable Conditions]**
- a. The total operating time of each affected source during the reporting period; and
  - b. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken;

C. Emissions Inventory Reporting

The Permittee shall complete and submit to the Control Officer, when requested, an annual emissions inventory questionnaire pursuant to PCC 17.12.320 of the Pima County Code. (See Part A, Section VI of this permit). [PCC 17.12.320]

**VI. TESTING REQUIREMENTS**

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

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

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

- B. If the Control Officer has reasonable cause to believe that a manufacturer's product information sheet referenced in III.A.2.d of this Part is deficient, the Control Officer may require the Permittee to conduct testing to confirm the validity of the information contained within the sheet in question.
- C. Testing for odors at the facility to determine compliance with the standard in II.B.2 of the Specific Conditions, is not normally necessary because the use of good modern practices prevents the emission of odors beyond the property boundary. The Control Officer may require the Permittee to test for odor emissions if the Control Officer has reasonable cause to believe a violation of a standard has been committed.

[PCC 17.20.010]

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**Attachment 1**

**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  
17.16.430      Standards of Performance for Unclassified Sources  
17.20.010      Source Sampling, Monitoring, and Testing (Section A)

**Attachment 2**

**Equipment List**

Type Of Equipment	Manufacturer	Model	Serial Number	Date of Manufacture	Date of Installation	Maximum Rated Capacity
Patriot Gel Coat System	Magnum Venus	MGS-PC-PAT-15	Unknown	2001	2007	6 lbs/min
Binks Gel Coat Gun	Binks Polycraft	B-1500 EP	E-1570	1999	Back Up Unit	1-6 lbs/min
Binks Gel Coater	Binks	207-11836	F-2015	1999	Back Up Unit	2.57 gal/min
MVP Gel Coat Gun	Magnum Venus	ATG-3500	Unknown	2001	2007	1-6 lbs/min

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