Marlam Industries, Inc.
V97-022
March 29, 2006
(Includes Significant Permit Revision S04-005)

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PERMIT CONDITIONS
Marlam Industries, Inc.
V97-022
(Includes Significant Permit Revision S04-005)

In accordance with Maricopa County Air Pollution Control Rules and Regulations (Rules), Rule 210 § 302.2, all Conditions of this Permit are federally enforceable unless they are identified as being locally enforceable only. However, any Permit Condition identified as locally enforceable only will become federally enforceable if, during the term of this Permit, the underlying requirement becomes a requirement of the Clean Air Act (CAA) or any of the CAA's applicable requirements.

All federally enforceable terms and conditions of this Permit are enforceable by the Administrator of the United States Environmental Protection Agency (Administrator or Administrator of the USEPA hereafter) and citizens under Section 304 of the CAA.

Any cited regulatory paragraphs or section numbers refer to the version of the regulation that was in effect on the first date of public notice of the applicable Permit Condition unless specified otherwise.

GENERAL CONDITIONS:

1. AIR POLLUTION PROHIBITED: [County Rule 100 §301] [SIP Rule 3]

The Permittee shall not discharge from any source whatever into the atmosphere regulated air pollutants which exceed in quantity or concentration that specified and allowed in the County or State Implementation Plan (SIP) Rules, the Arizona Administrative Code (AAC) or the Arizona Revised Statutes (ARS), or which cause damage to property or unreasonably interfere with the comfortable enjoyment of life or property of a substantial part of a community, or obscure visibility, or which in any way degrade the quality of the ambient air below the standards established by the Maricopa County Board of Supervisors or the Director of the Arizona Department of Environmental Quality (ADEQ).

2. CIRCUMVENTION: [County Rule 100 §104] [40 CFR 60.12] [40 CFR 63.4(b)]

The Permittee shall not build, erect, install, or use any article, machine, equipment, condition, or any contrivance, the use of which, without resulting in a reduction in the total release of regulated air pollutants to the atmosphere, conceals or dilutes an emission which would otherwise constitute a violation of this Permit or any Rule or any emission limitation or standard. The Permittee shall not circumvent the requirements concerning dilution of regulated air pollutants by using more emission openings than is considered normal practice by the industry or activity in question.

3. CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS:

[County Rule 100 §401] [County Rule 210 §§301.7, 302.1e(1), 305.1c(1) & 305.1e]

Any application form, report, or compliance certification submitted under the County Rules or these Permit Conditions shall contain certification by a responsible official of truth, accuracy, and completeness of the application form or report as of the time of submittal. This certification and any other certification required under the County Rules or these Permit Conditions shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

4. COMPLIANCE:

A. COMPLIANCE REQUIRED:

1) The Permittee must comply with all conditions of this permit and with all applicable requirements of Arizona air quality statutes and the air quality rules. Compliance with permit terms and conditions does not relieve, modify, or otherwise affect the Permittee's duty to comply with all applicable requirements of Arizona air quality statutes and the Maricopa County Air Pollution Control Regulations. Any permit non-compliance is grounds for enforcement action; for a permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application. Noncompliance with any federally enforceable requirement in this Permit constitutes a violation of the Act. [This Condition is federally enforceable if the condition or requirement itself is federally enforceable and only locally enforceable if the condition or requirement itself is locally enforceable only]

[County Rule 210 §§301.8b(4) & 302.1h(1)]

2) The Permittee shall halt or reduce the permitted activity in order to maintain compliance with applicable requirements of Federal laws, Arizona laws, the County Rules, or other conditions of this Permit.

[County Rule 210 §302.1h(2)]

3) For any major source operating in a nonattainment area for any pollutant(s) for which the source is classified as a major source, the source shall comply with reasonably available control technology (RACT) as defined in County Rule 100.

[County Rule 210 §302.1(h)(6)] [SIP Rule 220 §302.2]

4) For any major source operating in a nonattainment area designated as serious for PM_{10}, for which the source is classified as a major source for PM_{10}, the source shall comply with the best available control technology (BACT), as defined in County Rule 100.

[County Rule 210 §302.1(h)(7)]

B. COMPLIANCE CERTIFICATION REQUIREMENTS: [County Rule 210 §305.1d]

The Permittee shall file an annual compliance certification with the Control Officer and also with the Administrator of the USEPA. The report shall certify compliance with the terms and conditions contained in this Permit, including emission limitations, standards, or work practices. The certification shall be on a form supplied or approved by the Control Officer and shall include each of the following:

1) The identification of each term or condition of the permit that is the basis of the certification;
2) The compliance status;
3) Whether compliance was continuous or intermittent;
4) The method(s) used for determining the compliance status of the source, currently and over the reporting period; and
5) Other facts as the Control Officer may require to determine the compliance status of the source.

The annual certification shall be filed at the same time as the second semiannual monitoring report required by the Specific Condition section of these Permit Conditions and every 12 months thereafter.

C. COMPLIANCE PLAN: [County Rule 210 §305.1g]

Based on the certified information contained in the application for this Permit, the facility is in compliance with all applicable requirements in effect as of the first date of public notice of the proposed conditions for this Permit unless a compliance plan is included in the Specific Conditions section of this Permit. The Permittee shall continue to comply with all applicable requirements and shall meet any applicable requirements that may become effective during the term of this permit on a timely basis. [This Condition is federally enforceable if the applicable requirement itself is federally enforceable and only locally enforceable if the applicable requirement itself is locally enforceable only]

5. CONFIDENTIALITY CLAIMS:

Any records, reports or information obtained from the Permittee under the County Rules or this Permit shall be available to the public, unless the Permittee files a claim of confidentiality in accordance with ARS §49-487(c) which:

A. precisely identifies the information in the permit(s), records, or reports which is considered confidential, and

B. provides sufficient supporting information to allow the Control Officer to evaluate whether such information satisfies the requirements related to trade secrets or, if applicable, how the information, if disclosed, could cause substantial harm to the person's competitive position.

The claim of confidentiality is subject to the determination by the Control Officer as to whether the claim satisfies the claim for trade secrets.

[County Rule 100 §402] [County Rule200 §411]

A claim of confidentiality shall not excuse the Permittee from providing any and all information required or requested by the Control Officer and shall not be a defense for failure to provide such information.

[County Rule 100 §402]

If the Permittee submits information with an application under a claim of confidentiality under ARS §49-487 and County Rule 200, the Permittee shall submit a copy of such information directly to the Administrator of the USEPA.

[County Rule 210 §301.5]

6. CONTINGENT REQUIREMENTS:

NOTE: This Permit Condition covers activities and processes addressed by the CAA which may or may not be present at the facility. This condition is intended to meet the requirements of both Section 504(a) of the 1990 Amendments to the CAA, which requires that Title V permits contain conditions necessary to assure compliance with applicable requirements of the Act as well as the Acid Rain provisions required to be in all Title V permits.

A. ACID RAIN: [County Rule 210 §§302.1b(2) & 302.1f] [County Rule 371 §301]

1). Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the CAA and incorporated under County Rule 371, both provisions shall be incorporated into this Permit and shall be enforceable by the Administrator.

2) The Permittee shall not allow emissions exceeding any allowances that the source lawfully holds under Title IV of the CAA or the regulations promulgated thereunder and incorporated under County Rule 371.

a) No permit revision shall be required for increases in emissions that are authorized by allowances acquired under the acid rain program and incorporated under

County Rule 371, provided that such increases do not require a permit revision under any other applicable requirement.

b) No limit is placed on the number of allowances held by the Permittee. The Permittee may not, however, use allowances as a defense to non-compliance with any other applicable requirement.

c) Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the CAA.

d) All of the following prohibitions apply to any unit subject to the provisions of Title IV of the CAA and incorporated into this Permit under County Rule 371:

(1) Annual emissions of sulfur dioxide in excess of the number of allowances to emit sulfur dioxide held by the owners or operators of the unit or the designated representative of the owners or operators.

(2) Exceedances of applicable emission rates.

(3) The use of any allowance prior to the year for which it was allocated.

(4) Violation of any other provision of the permit.

B. ASBESTOS: [40 CFR 61, Subpart M] [County Rule 370 §301.8 - locally enforceable only]

The Permittee shall comply with the applicable requirements of Sections 61.145 through 61.147 and 61.150 of the National Emission Standard for Asbestos and County Rule 370 for all demolition and renovation projects.

C. RISK MANAGEMENT PLAN (RMP): [40 CFR 68]

Should this stationary source, as defined in 40 CFR 68.3, be subject to the accidental release prevention regulations in 40 CFR Part 68, then the Permittee shall submit an RMP by the date specified in 40 CFR Section 68.10 and shall certify compliance with the requirements of 40 CFR Part 68 as part of the annual compliance certification as required by 40 CFR Part 70. However, neither the RMP nor modifications to the RMP shall be considered to be a part of this Permit.

D. STRATOSPHERIC OZONE PROTECTION: [40 CFR 82 Subparts E, F, and G]

If applicable, the Permittee shall follow the requirements of 40 CFR 82.106 through 82.124 with respect to the labeling of products using ozone depleting substances.

If applicable, the Permittee shall comply with all of the following requirements with respect to recycling and emissions reductions:

1) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices under 40 CFR 82.156.

2) Equipment used during maintenance, service, repair, or disposal of appliances must meet the standards for recycling and recovery equipment in accordance with 40 CFR 82.158.

3) Persons performing maintenance, service, repair, or disposal of appliances must be certified by a certified technician under 40 CFR 82.161.

If applicable, the Permittee shall follow the requirements of 40CFR 82 Subpart G, including all Appendices, with respect to the safe alternatives policy on the acceptability of substitutes for ozone-depleting compounds.

7. DUTY TO SUPPLEMENT OR CORRECT APPLICATION: [County Rule 210 §301.6]

If the Permittee fails to submit any relevant facts or has submitted incorrect information in a permit application, the Permittee shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. In addition, the Permittee 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.

8. EMERGENCY EPISODES: [County Rule 600 §302] [SIP Rule 600 §302]

If an air pollution alert, warning, or emergency has been declared, the Permittee shall comply with any applicable requirements of County Rule 600 §302.

9. EMERGENCY PROVISIONS: [County Rule 130 §§201 & 402]

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 cause the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

An emergency constitutes an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the requirements of this Permit Condition are met.

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 source 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 this permit; and
D. The Permittee as soon as possible telephoned the Control Officer, giving notice of the emergency, and submitted notice of the emergency to the Control Officer by certified mail, facsimile, or hand delivery within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice fulfills the requirement of County Rule 210 §302.1.e(2) with respect to deviation reporting. This notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective action taken.

In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

This provision is in addition to any emergency or upset provision contained in any applicable requirement.

10. EXCESS EMISSIONS: [County Rule 140 §§103, 400]

NOTE: There are reporting requirements associated with excess emissions. These requirements are contained in the Reporting section of the General Permit Conditions in a subparagraph called Excess Emissions. The definition of excess emissions can be found in County Rule 100 §200.

A. Exemptions: The excess emissions provisions of this Permit Condition do not apply to the following standards and limitations:

1) Promulgated pursuant to Section 111 (Standards Of Performance for New Stationary Sources) of the Clean Air Act (Act) or Section 112 (National Emission Standards For Hazardous Air Pollutants) of the Act;

2) Promulgated pursuant to Title IV (Acid Deposition Control) of the Act or the regulations promulgated thereunder and incorporated under Rule 371 (Acid Rain) of these rules or Title VI (Stratospheric Ozone Protection) of the Act;
3) Contained in any Prevention Of Significant Deterioration (PSD) or New Source Review (NSR) permit issued by the Environmental Protection Agency (EPA);
4) Included in a permit to meet the requirements of Rule 240 (Permit Requirements For New Major Sources And Major Modifications To Existing Major Sources), Subsection 308.1(e) (Permit Requirements For Sources Located In Attainment And Unclassified Areas) of these rules.

B. Affirmative Defense For Malfunctions: Emissions in excess of an applicable emission limitation due to malfunction shall constitute a violation. The owner and/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 and/or operator of the source has complied with the excess emissions reporting requirements of these Permit Conditions and has demonstrated all of the following:
1) The excess emissions resulted from a sudden and unavoidable breakdown of the process equipment or the air pollution control equipment beyond the reasonable control of the operator;
2) 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;
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, then the owner and/or operator satisfactorily demonstrated that such measures were impractical;
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 County Rule 510 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's and/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 paragraph 2) below, and unless otherwise provided for in the applicable requirement, emissions in excess of an applicable emission limitation due to startup and shutdown shall constitute a violation. The owner and/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 and/or operator of the source has complied with the excess emissions reporting requirements of these Permit Conditions 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 County Rule 510 (Air Quality Standards) 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's and/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 paragraph A. of this Permit Condition.

D. Affirmative Defense For Malfunctions During Scheduled Maintenance: If excess emissions occur due to malfunction during scheduled maintenance, then those instances will be treated as other malfunctions subject to paragraph B. of this Permit Condition.

E. Demonstration Of Reasonable And Practicable Measures: For an affirmative defense under paragraphs A and B of this Permit Condition, the owner and/or operator of the source shall demonstrate, through submission of the data and information required by this Permit Condition and the excess emissions reporting requirements of these Permit Conditions, that all reasonable and practicable measures within the owner's and/or operator's control were implemented to prevent the occurrence of the excess emissions.

11. FEES: [County Rule 200 §409] [County Rule 210 §§302.1i & 401]

The Permittee shall pay fees to the Control Officer under ARS 49-480(D) and County Rule 280.

12. MODELING: [County Rule 200 §407] [locally enforceable only]

Where the Control Officer requires the Permittee to perform air quality impact modeling, the Permittee shall perform the modeling in a manner consistent with the "Guideline on Air Quality Models (Revised)" (EPA-450/2-78-027R, U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards, Research Triangle Park, N.C. 27711, July 1986) and "Supplement B to the Guideline on Air Quality Models" (U.S. Environmental Protection Agency, September 1990). Both documents shall be referred to hereinafter as "Guideline", and are adopted by reference. Where

the person can demonstrate that an air quality impact model specified in the guideline is inappropriate, the model may be modified or another model substituted if found to be acceptable to the Control Officer.

13. MONITORING / TESTING:

A. The Permittee shall monitor, sample, or perform other studies to quantify emissions of regulated air pollutants or levels of air pollution that may reasonably be attributable to the facility if required to do so by the Control Officer, either by Permit or by order in accordance with County Rule 200 §309.

[County Rule 200 §309] [SIP Rule 41]

B. Except as otherwise specified in these Permit Conditions or by the Control Officer, the Permittee shall conduct required testing used to determine compliance with standards or permit conditions established under the County or SIP Rules or these Permit Conditions in accordance with County Rule 270 and the applicable testing procedures contained in the applicable Rule, the Arizona Testing Manual for Air Pollutant Emissions or other approved USEPA test methods.

[County Rule 200 §408] [County Rule 210 §302.1.c] [County Rule 270 §§300 & 400] [SIP Rule 27]

C. The owner or operator of a permitted source shall provide, or cause to be provided, performance testing facilities as follows:

1) Sampling ports adequate for test methods applicable to such source.
2) Safe sampling platform(s).
3) Safe access to sampling platforms(s).
4) Utilities for sampling and testing equipment.

[County Rule 270 §405] [SIP Rule 42]

14. PERMITS:

A. BASIC: [County Rule 210 §302.1h(3)]

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

B. DUST CONTROL PLAN REQUIREMENTS:

(NOTE: If the Permittee engages in or allows any routine dust generating activities at the facility, the Permittee needs to have the routine dust generating activity covered as part of this Permit. Nonroutine activities, such as construction, require a separate Earthmoving Permit that must be obtained from the Control Officer before the activity may begin.)

1) The Permittee shall submit to the Control Officer a Dust Control Plan with any permit application that involves earthmoving operations with a disturbed surface area that equals or exceeds 0.1 acre, including both of the following situations:
   a) When submitting an application for an earthmoving permit involving earth moving operations that would equal or exceed 0.1 acre, and
   b) Before commencing any routine dust generating operation at the facility.

[County Rule 310 §303.1] [SIP Rule 310 §303.1]

2) A Dust Control Plan shall not be required to play on a ball field and/or for landscape maintenance. For the purpose of this Permit Condition, landscape maintenance does not include grading, trenching, nor any other mechanized surface disturbing activities.
[County Rule 310 §303.4] [SIP Rule 310 §303.4]

3) Any Dust Control Plan shall, at a minimum, contain all the information described in Sections 303.1, 303.3 and 304 of Rule 310.
[County Rule 310 §§303.1, 303.3 & 304] [SIP Rule 310 §§303.1, 303.3 & 304]

4) Regardless of whether an approved Dust Control Plan is in place or not, the Permittee is still subject to all requirements of Rule 310 at all times.
[County Rule 310 §303.2] [SIP Rule 310 §303.2]

C. PERMITS AND PERMIT CHANGES, AMENDMENTS AND REVISIONS:

1) The Permittee shall comply with the Administrative Requirements of Section 400 of County Rule 210 for all changes, amendments and revisions at the facility for any source subject to regulation under County Rule 200, shall comply with all required time frames, and shall obtain any required preapproval from the Control Officer before making changes. All applications shall be filed in the manner and form prescribed by the Control Officer. The application shall contain all the information necessary to enable the Control Officer to make the determination to grant or to deny a permit or permit revision including information listed in County Rule 200 §308 and County Rule 210 §§301 & 302.3.
[County Rule 200 §§301 & 308] [County Rule 210 §§301.4a, b, c, & 400]

2) The Permittee shall supply a complete copy of each application for a permit, a minor permit revision, or a significant permit revision directly to the Administrator of the USEPA. The Control Officer may require the application information to be submitted in a computer-readable format compatible with the Administrator's national database management system.
[County Rule 210 §§303.1a, 303.2, 405.4, & 406.4]

3) While processing an application, the Control Officer may require the applicant to provide additional information and may set a reasonable deadline for a response.
[County Rule 210 §301.4f]

4) No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.
[County Rule 210 §302.1j]

D. POSTING:

1) The Permittee shall keep a complete permit clearly visible and accessible on the site where the equipment is installed.
[County Rule 200 §311]

2) If a Dust Control Plan, as required by Rule 310, has been approved by the Control Officer, the Permittee shall post a copy of the approved Dust Control Plan in a conspicuous location at the work site, within on-site equipment, or in an on-site vehicle, or shall otherwise keep a copy of the Dust Control Plan available on site at all times.
[County Rule 310 §401] [SIP Rule 310 §401]

E. PROHIBITION ON PERMIT MODIFICATION: [County Rule 200 §310]
The Permittee shall not willfully deface, alter, forge, counterfeit, or falsify this permit.

F. RENEWAL:

1) The Permittee shall submit an application for the renewal of this Permit in a timely and complete manner. For purposes of permit renewal, a timely application is one that is submitted at least six months, but not more than 18 months, prior to the date of permit expiration. A complete application shall contain all of the information required by the County Rules including Rule 200 §308 and Rule 210 §§301 & 302.3.
[County Rule 210 §§301.2a, 301.4a, b, c, d, h & 302.3]

2) The Permittee shall file all permit applications in the manner and form prescribed by the Control Officer. To apply for a permit renewal, the Permittee shall complete the "Standard Permit Application Form" and shall supply all information, including the information required by the "Filing Instructions" as shown in Appendix B of the County Rules, which is necessary to enable the Control Officer to make the determination to grant or to deny a permit which shall contain such terms and conditions as the Control Officer deems necessary to assure a source's compliance with the requirements of the CAA, ARS and County Rules.
[County Rule 200 §§308 & 309] [County Rule 210 §301.1]

3) The Control Officer may require the Permittee to provide additional information and may set a reasonable deadline for a response.
[County Rule 210 §301.4f]

4) If the Permittee submits a timely and complete application for a permit renewal, but the Control Officer has failed to issue or deny the renewal permit before the end of the term of the previous permit, then the permit shall not expire until the renewal permit has been issued or denied. This protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit, by the deadline specified by the Control Officer, any additional information identified as being needed to process the application.
[County Rule 200 §403.2] [County Rule 210 §§301.4f & 301.9]

G. REVISION / REOPENING / REVOCATION:

1) This permit shall be reopened and revised to incorporate additional applicable requirements adopted by the Administrator pursuant to the CAA that become applicable to the facility if this permit has a remaining permit term of three or more years. No such reopening is required if the effective date of the requirement is later than the date on which this Permit is due to expire unless the original permit or any of its terms have been extended pursuant to Rule 200 §403.2.
[County Rules 200 §402.1]

Any permit revision required under this Permit Condition, 14.G.1, shall reopen the entire permit and shall comply with provisions in County Rule 200 for permit renewal *(Note: this includes a facility wide application and public comment on the entire permit)* and shall reset the five year permit term.
[County Rules 200 §402.1a(1) & 210 §302.5]

2) This permit shall be reopened and revised under any of the following circumstances:

a) 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 Title V permit.

b) 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.

c) The Control Officer or the Administrator determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

Proceedings to reopen and issue a permit under this Permit Condition, 14.G.2, shall follow the same procedures as apply to initial permit issuance and shall effect only those parts of the Permit for which cause to reopen exists.

[County Rule 200 §402.1]

3) This permit shall be reopened by the Control Officer and any permit shield revised, when it is determined that standards or conditions in the permit are based on incorrect information provided by the applicant.

[County Rule 210 §407.3]

4) This Permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Permit revision, revocation and reissuance, or termination or of a notification of planned changes or anticipated noncompliance does not stay any Permit Condition.

[County Rule 210 §302.1h(3)]

H. REVISION UNDER A FEDERAL HAZARDOUS AIR POLLUTANT STANDARD:

[County Rule 210 §301.2c] [locally enforceable only]

If the Permittee becomes subject to a standard promulgated by the Administrator under Section 112(d) of the CAA, the Permittee shall, within 12 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.

I. REQUIREMENTS FOR A PERMIT:

1) Air Quality Permit: Except as noted under the provisions in Sections 403 and 405 of County Rule 210, no source may operate after the time that it is required to submit a timely and complete application, except in compliance with a permit issued under County Rule 210. Permit expiration terminates the Permittee's right to operate. However, if a source submits a timely and complete application, as defined in County Rule 210 §301, for permit issuance, revision, or renewal, the source's failure to have a permit is not a violation of the County Rules until the Control Officer takes final action on the application. The Source's ability to operate without a permit as set forth in this paragraph shall be in effect from the date the application is determined to be complete until the final permit is issued. This protection shall cease to apply if, subsequent to the completeness determination, the applicant fails to submit, by the deadline specified in writing by the Control Officer, any additional information identified as being needed to process the application. If a source submits a timely and complete application for a permit renewal, but the Control Officer has failed to issue or deny the renewal permit before the end of the term of the previous permit, then the permit shall not expire until the permit renewal has been issued or denied.

[County Rule 210 §301.9]

2) Earthmoving Permit:
(NOTE: If the Permittee engages in or allows any routine dust generating activities at the facility, the Permittee needs to have the routine dust generating activity covered as part of this Permit. Non-routine activities, such as construction, require a separate Earthmoving Permit that must be obtained from the Control Officer before the activity may begin.)
The Permittee shall not cause, commence, suffer, allow, or engage in any earthmoving operation that disturbs a total surface area of 0.10 acre or more without first obtaining a permit from the Control Officer. Permits shall not be required for earthmoving operations for emergency repair of utilities, paved roads, unpaved roads, shoulders, and/or alleys.

[County Rule 200 §305]

3) Burn Permit: The Permittee shall obtain a Permit To Burn from the Control Officer before conducting any open outdoor fire except for the activities listed in County Rule 314 §§302.1 and 302.2.

[County Rule 314] [County Rule 200 §306] [SIP Rule 314]

J. RIGHTS AND PRIVILEGES: [County Rule 210 §302.1h (4)]

This Permit does not convey any property rights nor exclusive privilege of any sort.

K. SEVERABILITY: [County Rule 210 §302.1g]

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.

L. SCOPE:

The issuance of any permit or permit revision shall not relieve the Permittee from compliance with any Federal laws, Arizona laws, or the County or SIP Rules, nor does any other law, regulation or permit relieve the Permittee from obtaining a permit or permit revision required under the County Rules.

[County Rule 200 §308]

Nothing in this permit shall alter or affect the following:

1) The provisions of Section 303 of the Act (Emergency Orders), including the authority of the Administrator of the USEPA under that section.
2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.
3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Act.
4) The ability of the Administrator of the USEPA or of the Control Officer to obtain information from the Permittee under Section 114 of the Act, or any provision of State law.
5) The authority of the Control Officer to require compliance with new applicable requirements adopted after the permit is issued. [locally enforceable only]

[County Rule 210 §407.2]

M. TERM OF PERMIT: [County Rule 210 §§302.1a & 402]

This Permit shall remain in effect for no more than 5 years from the date of issuance.

N. TRANSFER: [County Rule 200 §404]

Except as provided in ARS §49-429 and County Rule 200, this permit may be transferred to another person if the Permittee gives notice to the Control Officer in writing at least 30 days before the proposed transfer and complies with the permit transfer requirements of County Rule 200 and the administrative permit amendment procedures under County Rule 210.

15. RECORDKEEPING:

A. RECORDS REQUIRED: [County Rule 100 §501] [County Rule 310 §502] [SIP Rule 40 A]

The Permittee shall maintain records of all emissions testing and monitoring, records detailing all malfunctions which may cause any applicable emission limitation to be exceeded, records detailing the implementation of approved control plans and compliance schedules, records required as a condition of any permit, records of materials used or produced, and any other records relating to the emission of air contaminants which may be requested by the Control Officer.

B. RETENTION OF RECORDS:

Unless a longer time frame is specified by these Permit Conditions, information and records required by applicable requirements and copies of summarizing reports recorded by the Permittee and submitted to the Control Officer shall be retained by the Permittee for 5 years after the date on which the information is recorded or the report is submitted

[County Rule 100 §504] [SIP Rule 40 C]

The Permittee shall retain records of all required monitoring data and support information for a period of at least five 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.

[County Rule 210 §§302.1d(2)]

C. MONITORING RECORDS: [County Rule 210 §§302.1d(1) & 305.1b]

Records of any monitoring required by this Permit shall include 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 analysis;
4) The analytical techniques or methods used;
5) The results of such analysis; and
6) The operating conditions as existing at the time of sampling or measurement.

D. RIGHT OF INSPECTION OF RECORDS: [County Rule 100 §106] [SIP Rule 40 D]

When the Control Officer has reasonable cause to believe that the Permittee has violated or is in violation of any provision of County Rule 100 or any County Rule adopted under County Rule 100, or any requirement of this permit, the Control Officer may request, in writing, that the Permittee produce all existing books, records, and other documents evidencing tests, inspections, or studies which may reasonably relate to compliance or noncompliance with County Rules adopted under County Rule 100. No person shall fail nor refuse to produce all existing documents required in such written request by the Control Officer.

16. REPORTING:

NOTE: See the Permit Condition titled Certification Of Truth, Accuracy and Completeness in conjunction with reporting requirements.

A. ANNUAL EMISSION INVENTORY REPORT: [County Rule 100 §505] [SIP Rule 40 B]

Upon request of the Control Officer and as directed by the Control Officer, the Permittee shall complete and shall submit to the Control Officer an annual emissions inventory report. The report is due by April 30, or 90 days after the Control Officer makes the inventory form(s) available, whichever occurs later.

The annual emissions inventory report shall be in the format provided by the Control Officer.

The Control Officer may require submittal of supplemental emissions inventory information forms for air contaminants under ARS §49-476.01, ARS §49-480.03 and ARS §49-480.04.

B. DATA REPORTING: [County Rule 100 §502]

When requested by the Control Officer, the Permittee shall furnish to the Maricopa County Air Quality Division (Division hereafter) information to locate and classify air contaminant sources according to type, level, duration, frequency, and other characteristics of emissions and such other information as may be necessary. This information shall be sufficient to evaluate the effect on air quality and compliance with the County or SIP Rules. The Permittee may subsequently be required to submit annually, or at such intervals specified by the Control Officer, reports detailing any changes in the nature of the source since the previous report and the total annual quantities of materials used or air contaminants emitted.

C. DEVIATION REPORTING: [County Rule 210 §§302.1e & 305.1c]

The Permittee shall promptly report deviations from permit requirements, including those attributable to upset conditions. Unless specified otherwise elsewhere in these Permit Conditions, an upset for the purposes of this Permit Condition shall be defined as the operation of any process, equipment or air pollution control device outside of either its normal design criteria or operating conditions specified in this Permit and which results in an exceedance of any applicable emission limitation or standard. The Permittee shall submit the report to the Control Officer within 2 working days from knowledge of the deviation. The report shall contain a description of the probable cause of such deviations and any corrective actions or preventive measures taken. In addition, the Permittee shall report within a reasonable time of any long-term corrective actions or preventative actions taken as the result of any deviations from permit requirements.

All instances of deviations from the requirements of this Permit shall also be clearly identified in the semiannual monitoring reports required in the Specific Condition section of these Permit Conditions.

D. EMERGENCY REPORTING: [County Rule 130 §402.4]

(NOTE: Emergency Reporting is one of the special requirements which must be met by a Permittee wishing to claim an affirmative defense under the emergency provisions of County Rule 130. These provisions are listed earlier in these General Conditions in the section titled "Emergency Provisions". Since it is a form of deviation reporting, the filing of an emergency report also satisfies the requirement of County Rule 210 to file a deviation report.)

The Permittee shall, as soon as possible, telephone the Control Officer giving notice of the emergency, and submitted notice of the emergency to the Control Officer by certified mail, facsimile, or hand delivery within 2 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.

E. EMISSION STATEMENTS REQUIRED AS STATED IN THE ACT:

[County Rule 100 §503]

Upon request of the Control Officer and as directed by the Control Officer, the Permittee shall provide the Control Officer with an emission statement, in such form as the Control Officer prescribes, showing measured actual emissions or estimated actual emissions of NO_x and volatile organic compounds (VOC) from that source. At a minimum, the emission statement shall contain all information contained in the "Guidance on Emission Statements" document as described in the USEPA's Aerometric Information Retrieval System (AIRS) Fixed Format Report (AFP 644). The statement shall contain emissions for the time period specified by the Control Officer. Statements shall be submitted annually.

F. EXCESS EMISSIONS REPORTING: [County Rule 140 §500] [locally enforceable only]

(NOTE: This reporting subsection is associated with the requirements listed earlier in these General Conditions in the section titled "Excess Emissions".)

1) The owner and/or operator of any source shall report to the Control Officer any emissions in excess of the limits established by the County or SIP Rules or by these Permit Conditions. The report shall be in two parts as specified below:
   a) Notification by telephone or facsimile within 24 hours of the time when the owner and/or operator first learned of the occurrence of excess emissions that includes all available information from paragraph 2) of this Permit Condition.
   b) Detailed written notification by submission of an excess emissions report within 72 hours of the notification required by paragraph 1) a) of this Permit Condition.

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 such 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 such malfunctions;
   g) The steps that were or are being taken to limit the excess emissions; and
   h) If this 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 Permit Condition 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 paragraphs 1) and 2) of this Permit Condition.

G. OTHER REPORTING: [County Rule 210 §302.1h(5)]
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 this permit, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Control Officer copies of records required to be kept by this Permit. For information claimed to be confidential, the Permittee shall furnish a copy of such records directly to the Administrator of the USEPA along with a claim of confidentiality as covered elsewhere in these Permit Conditions.

17. RIGHT TO ENTRY AND INSPECTION OF PREMISES:

The Control Officer, during reasonable hours, for the purpose of enforcing and administering County Rules or any provision of ARS relating to the emission or control prescribed pursuant thereto, may enter every building, premises, or other place, except the interior of structures used as private residences. Every person is guilty of a petty offense under ARS §49-488 who in any way denies, obstructs or hampers such entrance or inspection that is lawfully authorized by warrant.
[County Rule 100 §105]

The Permittee shall allow the Control Officer or his authorized representative, upon presentation of proper credentials and other documents as may be required by law, 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;
[County Rule 210 §305.1f] [SIP Rule 43]

B. Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;
[County Rule 210 §305.1f] [SIP Rule 43]

C. Inspect, at reasonable times, any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
[County Rule 210 §305.1f] [SIP Rule 43]

D. Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements; and
[County Rule 210 §305.1f] [SIP Rule 43]

E. To record any inspection by use of written, electronic, magnetic, and photographic media.
[County Rule 210 §305.1f] [Locally enforceable only]

SPECIFIC CONDITIONS:

18. ALLOWABLE EMISSIONS LIMITATIONS

Facility-Wide Requirements

A. The Permittee shall not cause, allow, or permit Volatile Organic Compounds (VOC) emissions from the facility to exceed neither 10 tons per month nor 99 tons per rolling 12 month period.
[County Rule 210 §301.8b(4)][County Rule 240]

B. Opacity

1) The Permittee shall not discharge into the ambient air from any single source of emissions any air contaminant, other than uncombined water, in excess of 20 percent opacity, except as provided in County Rule 300 §302.

[County Rule 300 §301][locally enforceable only]

2) Except as otherwise provided in Regulation I, Rule 4, Exceptions, the opacity of any plume or effluent from any source of emissions, other than uncombined water, shall not be greater than 40 percent opacity as determined by Reference Method 9 in the Arizona Testing Manual.

[SIP Rule 30]

C. Particulate Matter

1) The Permittee shall not discharge or cause or allow the discharge of particulate matter emissions into the ambient air from any affected operation in excess of the allowable hourly emission rate determined by the following equation:

$E = 3.59\ P^{0.62}$ (P = less than or equal to 30 tons/hr)

where:

E = Emissions in pounds per hour, and

P = Process weight rate in tons per hour.

[County Rule 311 §301.1][SIP Rule 311 §301.1]

2) The total process weight from all similar operations at a facility, plant, or premises shall be used for the determination of the maximum allowable emissions of particulate matter.

[County Rule 311 §302][SIP Rule 311 §301.1]

19. OPERATIONAL LIMITATIONS AND STANDARDS

A. <u>Facility-Wide Operational Requirements</u>

1) Gaseous and Odorous Emissions: The Permittee shall not emit gaseous or odorous air contaminants from equipment, operations, or premises under his control in such quantities or concentrations as to cause air pollution.

[County Rule 320 §300][SIP Rule 32]

2) Material Containment Required: Materials including, but not limited to, solvents or other volatile compounds, paints, acids, alkalies, pesticides, fertilizer and manure shall be processed, stored, used and transported in such a manner and by such means that they will not unreasonably 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.

[County Rule 320 §302][SIP Rule 32]

3) Stack Requirements: Where a stack, vent or other outlet is at such a level that air contaminants 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 to a degree that will adequately dilute, reduce or eliminate the discharge of air contaminants to adjoining property.

[County Rule 320 §303] [SIP Rule 32]

B. Operational Requirements for Spray Coating Equipment

1) The Permittee shall not use or operate any spray painting or spray coating equipment unless one of the following conditions is met:

a) The Permittee shall not operate spray coating equipment outside of a building unless it is operated inside an enclosure which has at least three sides a minimum of eight feet in height and able to contain any object(s) being coated.

(1) For three-sided enclosures, the Permittee shall direct the spray in a horizontal or downward pointing manner so that overspray is directed at the walls or floor of the enclosure. No spraying shall be conducted within three feet of any open end and/or within two feet of the top of the enclosure.

(2) For enclosures with three sides and a roof, or for complete enclosures, the Permittee shall direct the spray into the enclosure so that the overspray is directed away from any opening in the enclosure. No spraying shall be conducted within three feet of any open end and/or within two feet of any open top of the enclosure.

[County Rule 315 §301.1][locally enforceable only]

b) The Permittee shall install and operate a filtering system on any spray booth or enclosure with forced air exhaust.

(1) The filtering system shall have an average overspray removal efficiency of at least 92% by weight, as certified in writing by the manufacturer, for the type of material being sprayed.

(2) No gaps, sags or holes shall be present in the filters and all exhaust must be discharged into the atmosphere.

[County Rule 315 §301.2][locally enforceable only]

2) The Permittee shall be exempt from Subsection 1) of this Permit Condition if the spray coating operation is one of the following:

a) Spray coating of buildings or dwellings, including appurtenances and any other ornamental objects that are not normally removed prior to coating;

b) Spray coating of facility equipment or structures which are fixed in a permanent location and cannot easily be moved into an enclosure or spray booth and which are not normally dismantled or moved prior to coating;

c) Spray coating of objects which cannot fit inside of an enclosure with internal dimensions of 10’W x 25’L x 8’H;

d) Enclosures and spray booths and exhausts located entirely in a completely enclosed building, providing that any vents or openings do not allow overspray to be emitted into the outside air; or

e) Coating operations utilizing only hand-held aerosol cans.

[County Rule 315 §302][locally enforceable only]

C. Operational Requirements for VOC-containing materials

1) The Permittee shall not store, discard, or dispose of VOC or VOC-containing material in a way intended to cause or to allow the evaporation of VOC to the atmosphere. Reasonable measures shall be taken to prevent such evaporation, which include but are not limited to the following:

(a) All materials from which VOC can evaporate, including fresh solvent, waste solvent and solvent-soaked rags and residues, shall be stored in closed containers when not in use; and

(b) Such containers one gallon and larger shall be legibly labeled with their contents; and

(c) Records of the disposal/recovery of such materials shall be kept. Records of hazardous waste disposal shall be kept in accordance with hazardous waste disposal statutes.

[County Rule 330 §306][locally enforceable only]

2) The Permittee shall not use any liquid materials containing more than 10 percent volatile organic compounds for the cleanup of equipment unless:

(a) The used cleaning liquids are collected in a container which is closed when not in use and is disposed of in a manner such that volatile organic compounds are not emitted into the atmosphere, or

(b) The equipment is disassembled and cleaned in a solvent vat, which is closed when not in use, or cleaning is done by other methods, approved in writing by the Control Officer, which limit evaporation.

[County Rule 330 §305][locally enforceable only]

D. Operational Requirements for Solvent Cleaning

Unless exempted by County Rule 331 §308, the Permittee shall comply with all of the following requirements:

1) All cold cleaners shall comply with one of the following requirements:

[County Rule 210 §302.1]

a) The Permittee shall use low VOC cleaner. A low VOC cleaner is any solution or homogeneous suspension that, as used, contains less than 50 grams of VOC per liter of material (0.42 lb VOC/ gal), or is at least 95% water by weight or volume as determined by an applicable test method in County Rule 331 §502; OR

[County Rule 331 §§218 and 304.3]

b) The Permittee shall use a sealed system. A sealed system is an airtight or airless cleaning system that is operated according to the manufacturer's specifications and, unless otherwise indicated by the manufacturer, meets all of the following requirements:

(1) Has a door or other pressure-sealing apparatus that is shut during each cleaning and drying cycle.

(2) Has a differential pressure gauge that always indicates the pressure in the sealed chamber when occupied or in active use.

(3) Any associated pressure relief device(s) shall be so designed and operated as to prevent liquid cleaning-solvents from draining out; OR

[County Rule 331 §304.3]

c) The Permittee shall install or operate batch loaded cleaners with a remote reservoir, including the cabinet type(s), equipped with the following:
   (1) A sink-like work area or basin that is sloped sufficiently towards the drain so as to prevent pooling of cleaning-solvent.
   (2) A single, unimpeded drain opening or cluster of openings served by a single drain for the cleaning-solvent to flow from the sink into the enclosed reservoir. Such opening(s) shall be contained within a contiguous area not larger than 15.5 square inches (100 cm^2).
   (3) A means for drainage of cleaned parts such that the drained solvent is returned to the cleaning machine; OR

[County Rule 331 §305][SIP Rule 331 §302]

d) The Permittee shall install or operate batch-loaded cleaners without a remote reservoir (such as a solvent dip-tank), equipped with all of the following:
   (1) Have and use an internal drainage rack or other assembly that confines within the freeboard all cleaning-solvent dripping from parts and returns it to the hold of the cleaning machine (degreaser).
   (2) Have an impervious cover which when closed prevents cleaning-solvent vapors in the cleaning machine from escaping into the air/atmosphere when not processing work in the cleaning machine. The cover shall be fitted so that in its closed position the cover is between the cleaning-solvent and any lip exhaust or other safety vent, except that such position of cover and venting may be altered by an operator for valid concerns of flammability established in writing and certified to by a Certified Safety Professional or a Certified Industrial Hygienist to meet health and safety requirements.
   (3) The freeboard height shall be not less than 6 inches (15.2 cm). Freeboard height for batch cleaning machines is the vertical distance from the solvent/air interface to the least elevated point of the top-rim when the cover is open or removed, measured during idling mode.
   (4) The freeboard zone shall have a permanent, conspicuous mark that locates the maximum allowable solvent level that conforms to the applicable freeboard requirements.

[County Rule 331 §305][SIP Rule 331 §302]

2) Solvent Handling Requirements

a) All cleaning-solvent, including solvent soaked materials, shall be kept in closed leakfree containers that are opened only when adding or removing material.
   (1) Rags used for wipe cleaning shall be stored in closed containers when not in use.
   (2) Each container shall be clearly labeled with its contents.

[County Rule 331 §301.1][SIP Rule 331 §§301 and 306]

b) If any cleaning-solvent escapes from a container:
   (1) Wipe up or otherwise remove immediately if in accessible areas.
   (2) For areas where access in not feasible during normal production, remove as soon as reasonably possible.

[County Rule 331 §301.2][locally enforceable only]

c) Unless records show that VOC-containing cleaning material was sent offsite for legal disposal, it will be assumed that it evaporated on site.

[County Rule 331 §301.3][locally enforceable only]

3) Equipment Requirements for All Cleaning Machines

a) The Permittee shall provide a leak-free container (degreaser) for the solvents and the articles being cleaned.

[County Rule 331 §302.1][SIP Rule 331 §301.1]

(1) The VOC-containment portion shall be impervious to VOC-containing liquid and vapors.

[County Rule 331 §302.1a][locally enforceable only]

(2) No surface of any freeboard required by these Permit Conditions shall have an opening or duct through which VOC can escape to the atmosphere except as required by OSHA.

[County Rule 331 §302.1b][locally enforceable only]

b) The Permittee shall properly maintain and operate all cleaning machine equipment required by these Permit Conditions and any of its emission controls required by these Permit Conditions.

[County Rule 331 §302.2][SIP Rule 331§ 306.1]

c) The Permittee shall not dispose of any solvent, including waste solvent, in such a manner as will cause or allow its evaporation into the atmosphere. Records of its disposal/recovery shall be kept in accordance with hazardous waste disposal statutes.

[SIP Rule 331 §306.4]

4) Specific Operating & Signage Requirements For Cleaning Machines

[County Rule 331 §303][SIP Rule 331 §306]

a) The Permittee shall conform to the following operating requirements when cleaning with cleaning-solvents other than Low-VOC Cleaners or when not using a sealed system:

(1) Comfort fans shall not be used near cleaning machines;

(2) Do not remove any device designed to cover the solvent unless processing work in the cleaning machine or maintaining the machine;

(3) Drain cleaned parts for at least (15) fifteen seconds after cleaning or until dripping ceases, whichever is later;

(4) If using a cleaning-solvent spray system:

(a) Use only a continuous, undivided stream (not a fine, atomized, or shower type spray).

(b) Pressure at the orifice from which the solvent emerges shall not exceed (10) ten psig and shall not cause liquid solvent to splash outside the solvent container.

(c) In an in-line cleaning machine, a shower-type spray is allowed, provided that the spraying is conducted in a totally confined space that is separated from the environment.

(d) Exceptions to the foregoing Subsections (a), (b), and (c) are provided for in County Rule 331 §§307.1, 307.2, and 307.3.

(5) The Permittee shall not cause agitation of a cleaning-solvent in a cleaning machine by sparging with air or other gas. Covers shall be placed over ultrasonic cleaners when the cleaning cycle exceeds (15) fifteen seconds;

(6) The Permittee shall not place porous or absorbent materials in or on a cleaning machine. This includes, but is not limited to, cloth, leather, wood, and rope. No object with a sealed wood handle, including a brush, is allowed;

(7) The ventilation rate at the cleaning machine shall not exceed 65 cfm per square foot of evaporative surface (20 $m^3/min/m^2$), unless that rate must be changed to meet a standard specified and certified by a Certified Safety Professional, a Certified Industrial Hygienist, or a licensed professional engineer experienced in ventilation, to meet health and safety requirements;

(8) Limit the vertical speed of mechanical hoists moving parts in and out of the cleaning machine to a maximum of 2.2 inches per second and (11) eleven ft/ min (3.3 m/min);

(9) The Permittee shall prevent cross contamination of solvents regulated by County Rule 331§304 of this Section with solvents that are not so regulated. Use signs, separated work-areas, or other effective means for this purpose. This includes those spray gun cleaning solvents that are regulated by another Section of this Permit.

b) Should the Permittee use a cleaning-solvent other than Low-VOC cleaner, in any solvent machine (degreaser) or dip tank that is not a sealed system, the Permittee shall provide on the machine, or within 3 1/4 feet (1 meter) of the machine, a permanent, conspicuous label, or placard which includes at a minimum, each of the following applicable instructions, or its equivalent:

(1) "Keep cover closed when parts are not being handled." (This is not required for remote reservoir cleaners.)

(2) "Drain parts until they can be removed without dripping."

(3) "Do not blow off parts before they have stopped dripping."

(4) "Wipe up spills and drips as soon as possible; store used spill rags [or 'wiping material'] in covered container."

(5) "Don't leave cloth or any absorbent materials in or on this tank."

(6) For cleaning machines with moving parts such as hoists, pumps, or conveyors, post: "Operating instructions can be obtained from _____" where the Permittee shall list a person or place where the instructions are available.

5) Solvent Specification [County Rule 331 §304][locally enforceable only]

All cleaning solvents, except Low-VOC cleaners and those used in a sealed system, shall be conforming solvents. A conforming solvent is one which has a total VOC vapor pressure at 68ºF (20ºC) not exceeding 1 millimeter of mercury column maximum total VOC vapor pressure.

6) Special Non-Vapor Cleaning Situations

[County Rule 331 §§307.1, 307.2 and 307.3]

a) The Permittee shall operate and equip the devices in the following manner when blasting or misting with conforming solvents;

(1) The device shall have internal drainage, a reservoir or sump, and a completely enclosed cleaning chamber, designed so as to prevent any perceptible liquid from emerging from the device; and

(2) The device shall be operated such that there is no perceptible leakage from the device except for incidental drops from drained, removed parts.

b) The Permittee shall use a sealed system for all blasting or misting with a non-conforming solvent.

c) Cleaning systems using cleaning-solvent that emerges from an object undergoing high pressure flushing with a visible mist or at a pressure exceeding 10 psig, shall comply as follows;
   (1) For conforming solvents, use a containment system that is designed to prevent any perceptible cleaning-solvent liquid from becoming airborne outside the containment system, such as a completely enclosed chamber.
   (2) Use a sealed system for non-conforming solvents.

d) Low-VOC cleaners are not subject to the foregoing special non-vapor cleaning requirements a), b) and c).

20. MONITORING AND RECORDKEEPING REQUIREMENTS

A. Facility-Wide Requirements

1) VOCs [County Rule 210 §302.1c]

The Permittee shall monitor for compliance with the facility-wide VOC emission limit of these Permit Conditions by calculating and recording the monthly and the rolling 12 month emissions of VOCs. The Permittee shall keep on site records consisting of:

a) amount used of each VOC-containing material per month. Records of usage of the polyester resin will indicate whether it was mixed in the buckets or in the extruder.
b) Styrene content for gelcoats and resins, Methyl Methacrylate (MMA) content for gelcoats and total VOC content for all other VOC containing materials
c) MSDS or other information supporting the VOC content or styrene content of resins/gelcoats, as well as MMA content of gelcoats.

For the emission calculations, it will be assumed that for VOC-containing materials, with the exception of gelcoats and resins, all VOC content is emitted to the atmosphere unless records acceptable to the Control Officer are kept documenting the VOC-containing materials disposed of off site. For gelcoats and resins, emissions shall be calculated using the following formula:

$$E = (G)(e.f._G) + (R_p)(\%S_R)(e.f._p) + (R_t)(e.f._t) + (R_{to})(e.f._{to})$$

where,

E = Total emissions in pounds.

G = usage gelcoat in pounds.

$e.f._G$ = the combined styrene and MMA emission factors for the gelcoat. This combined emission factor shall be calculated by adding the most recent styrene and MMA emission factors for the gelcoat, as listed in the technical support document (TSD) for this permit or otherwise approved in writing by the control officer. Each individual emission factor is based on percent styrene and MMA contents in the gelcoat.

$\%S_R$ = Emission factor approved by MCESD for the polyester resin when it is mixed in the extruder.

R_p = usage of polyester resin in pounds of neat resin weight (without filler).

$e.f._p$ = the most recent styrene emission factor for the polyester resin, based on precent styrene in the polyester resin, as listed in the technical support document (TSD) for this permit or otherwise approved in writing by the

control officer. This emission factor shall be adjusted to reflect whether the resin is mixed in buckets (manually) or in the extruder.

R_t = usage of tub resin in pounds of neat resin weight (without filler).

$e.f._t$ = the most recent styrene emission factor for the tub resin, based on percent styrene in the tub resin, as listed in the technical support document (TSD) for this permit or otherwise approved in writing by the control officer. The Permittee shall use the "mechanical atomized application" emission factors unless records acceptable to the Control Officer are kept demonstrating this is a non-atomized application.

R_{to} = usage of tooling resin in pounds of neat resin weight (without filler).

$e.f._{to}$ = the most recent styrene emission factor for the tooling resin, based on percent styrene in the tooling resin, as listed in the technical support document (TSD) for this permit or otherwise approved in writing by the control officer.

The 12 month rolling emissions total shall be calculated by summing the emissions from the most recent complete 12 calendar months. The monthly and rolling 12 month total emissions of VOCs from the facility shall be calculated based upon one of the following methods:

a) Upon initial issuance of this permit and anytime thereafter that the 12 month rolling total of VOC emissions from the facility is less than 90 tons, the Permittee may calculate the facility's VOC emission based upon the purchase records for each month. The calculations shall be made no later than the end of the following month.

b) If the 12 month rolling total of VOC emissions from the facility reaches 90 tons, the Permittee shall begin to record and use actual material usage to calculate facility emissions. The monthly calculation of the 12 month rolling total emissions of VOCs shall be completed by the 10th of the following month. Monthly emission calculations under this scenario shall be calculated on a weekly basis and shall be performed by the end of the following week.

2) Odor Log [County Rule 210 §302.1.c.(2)] [locally enforceable only]

The Permittee shall maintain a log of complaints of odors detected off-site. The log shall contain a description of the complaint, date and time that the complaint was received, and if given, name and/or phone number of the complainant. The logbook shall describe what actions were performed to investigate the complaint, the results of the investigation, and any corrective actions that were taken.

3) Material Records

[County Rule 330 §503]

The Permittee shall keep the following records for five years and shall make them available to the Control Officer upon request:

a) Current List: Maintain a current list of coatings, adhesives, makeup solvents, and any other VOC-containing materials; state the VOC content of each in pounds per gallon or grams per liter, and the percent styrene content for resins and gelcoats. VOC content shall be expressed less water and non-precursor compounds for materials which are not used for cleaning or cleanup.

b) Monthly Usage Records: Maintain monthly records of the amount of each coating; adhesive; makeup solvent; solvent used for surface preparation, for cleanup, and for the removal of materials; and any other VOC-containing materials used.

c) Discarded Materials: Maintain records of the type, amount, and method of disposing of VOC-containing materials on each day of disposal.

B. Monitoring and Recordkeeping Requirements for Opacity, Material Containment, Spray Coating and Cleaning Machines

1) Daily Walkaround:

[County Rule 210 §302.1d]

The Permittee shall inspect each filter installed on a spray booth or enclosure, for gaps, sags or holes once per day.

a) Should the Permittee observe any gaps, sags or holes in any of the filters, the Permittee shall immediately repair or replace the filter and record the name of the inspector, the date and time of the observation and replacement of the filter, and the location of filtering system containing the filter (if more than one spray booth).

b) If no gaps, sags or holes are observed in any of the filters, the Permittee shall record the name of the inspector, the location of the filtering system containing the filter (if more than one spray booth), and the time and date that the filter was inspected.

2) Weekly Walkaround: The Permittee shall weekly conduct a facility walk-through and observe the following:

a) Opacity

(1) The Permittee shall monitor for compliance with the particulate matter limits of this permit by observing visible emissions from any source capable of emitting any air contaminant, other than uncombined water, to the ambient air. The Permittee shall log the visual observations, including the date and time when that reading was taken, whether or not visible emissions were present, name of the person who took the reading and any other related information.

[County Rule 300][County Rule 210 §302.1.c (1)][SIP Rule 30]

(2) If visible emissions are observed from any device capable of emitting any air contaminant other than uncombined water, the Permittee shall obtain an opacity reading conducted in accordance with EPA Reference Method 9 by a certified visible emissions (VE) reader. If the Permittee has not received a compliance status notification or notice of violation of an opacity standard in the 12 months preceding the observation, the initial Method 9 reading shall be taken within 3 days of the visual observance. Follow-up Method 9 readings by a certified VE reader shall be taken daily thereafter for the next 13 days that the emitting equipment is operated. After the daily Method 9 readings for 14 days of operation have been obtained, the Permittee shall perform weekly Method 9 readings during each week that the emitting equipment is in operation. The requirement to obtain Method 9 readings shall no longer apply if there are no visible emissions during the operation of the equipment that previously produced the visible emissions.

If the Permittee has received a compliance status notification or notice of violation of an opacity standard in the 12 months preceding the visual

observation, the initial Method 9 reading shall be taken within 1 day of the visual observance.

If no operation of the emitting equipment occurs on the day of the initial Method 9 reading is required to be taken, then the initial certified Method 9 reading shall be taken the next day that the emitting equipment is in operation. If the problem causing the visible emissions is corrected before the initial Method 9 reading is required, and no emissions are visible with the previously emitting equipment in operation, the Permittee shall not be required to conduct the Method 9 readings.

The Permittee shall log all visual observations and readings including the following:

(a) The date and time that a visible emissions or Method 9 reading was taken;
(b) The name of the person who made the observation or the reading;
(c) Whether or not visible emissions were present;
(d) The opacity of visual emissions determined by a Method 9 reading, if applicable;
(e) A description of any corrective actions taken, including date, if applicable; and
(f) Any other related information.

[County Rule 210 §302.1.c.(1)] [SIP Rule 31]

(3) Opacity Readings

(a) Opacity shall be determined by observations of visible emissions conducted in accordance with 40 CFR Part 60 Appendix A, Method 9.

[40 CFR 60.11.b] [County Rule 300 §501]

(b) Opacity of visible emissions from intermittent sources as defined by County Rule 300 §201 shall be determined by observations conducted in accordance with 40 CFR Part 60 Appendix A, Method 9, except that at least 12 rather than 24 consecutive readings shall be required at 15-second intervals for the averaging time.

[County Rule 300 §502] [locally enforceable only]

b) VOC Containment

The Permittee shall observe that reasonable measures are being taken to contain and prevent evaporation of VOC to the atmosphere. These reasonable measures include, but are not limited to storing all VOC materials, fresh and waste solvent, and solvent-soaked rags in closed, properly labeled containers when not in use. The Permittee shall log the observations, including the date and time, whether reasonable measures were being taken, name of the person who took the reading, any problems observed and correction actions taken.

[County Rule 210 §302.1c]

c) Spray Coating

[County Rule 210 §302.1d]

(1) Should the Permittee operate any spray coating equipment inside an enclosure that is located outside of a building, the Permittee shall observe spraying activity occurring in such enclosures to ensure the following:
   (a) No spraying is conducted within three feet of any open end, or within two feet of any open top of the enclosure; and
   (b) The spray is directed in a horizontal or downward pointing manner for three-side enclosures, or away from any opening for complete enclosures and three-sided enclosures with roofs.

   This observation shall not be needed on any week when spraying in such enclosures is not conducted.

(2) The Permittee shall inspect the facility for evidence of any spraying activity that occurred outside of any enclosure required by these Permit Conditions. The Permittee shall record the results of the inspection, including the name of the person conducting the inspection and the date of the inspection.

d) Cleaning Machines [County Rule 210 §302.1d]
The Permittee shall conduct visual observations of the cleaning machines and log the date and time when the observation was conducted and whether or not the cleaning machines were in compliance with the operational requirements of Permit Condition 19 and any other related information.

3) The Permittee shall maintain on file and make available to the Control Officer upon request, a copy of the manufacturer's specifications verifying that the average overspray removal efficiency for the filter is at least 92% by weight.
[County Rule 210 §302.1d]

C. Monitoring and Recordkeeping Requirements for Solvent Cleaning
[County Rule 331 §501][SIP Rule 331 §501]

1) The Permittee shall maintain a current list of cleaning-solvents, and shall state the VOC-content of each in pounds VOC per gallon of material or grams per liter of material.
2) Should the Permittee use any cleaning-solvent subject to the vapor-pressure limits of County Rule 331 §304.1 and Permit Conditions based on those limits, the Permittee shall have on site the written value of the total VOC vapor-pressure of each such solvent in one of the following forms:
   a) A manufacturer's technical data sheet,
   b) A manufacturer's safety data sheet (MSDS), or
   c) Actual test results.
3) By the end of each calendar month, the Permittee shall record the amount of cleaning-solvent used during the previous month, as well as show the type and amount of each make-up and all other cleaning-solvent.
4) At least annually, the Permittee shall update usage records of concentrate that is used only in the formulation of Low VOC Cleaner.
5) For the purposes of recording usage, the Permittee may give cleaning-solvents of similar VOC content a single group-name distinct from any product names in the group. The total usage of all the products in that group are then recorded under just one name. (In such a case, the operator must also keep a separate list that identifies the product names of the particular solvents included under the group name.) To the group

name shall be assigned the highest VOC content among the members of that group, rounded to the nearest 10th of a pound of VOC per gallon of material, or to the nearest gram VOC per liter of material.

21. REPORTING REQUIREMENTS

**NOTE: Additional reporting requirements are found in the general conditions of this permit.*

The Permittee shall file semi-annual monitoring reports with the Control Officer, Attn: Large Source Compliance Supervisor. The initial reporting period shall begin on the permit issuance date and shall cover a period of 6 months or less. The second and subsequent reporting periods shall be in 6-month intervals after the end of the initial reporting period. The semiannual monitoring reports shall be filed by the end of the month following the reporting period. Each report shall cover all instances of deviations from these permit conditions during the reporting period, the cause of the deviations if any were present, and any applicable corrective actions taken. The monitoring report shall be certified as to its truth, accuracy and completeness by a responsible official in the manner required by County Rule 210 §§301.7 and 305.1(e), and which shall contain the following information, at a minimum:

A) Emissions Calculations [County Rule 210 §302.1e]
The Permittee shall include the results of the monthly and rolling 12-month emissions calculations for each month in the six-month reporting period.

B) Deviation Reporting [County Rule 210 §302.1e(1)]
The Permittee shall identify all instances of deviations from permit requirements in the semi-annual monitoring report. The Permittee shall include the probable cause of such deviations, and any corrective actions or preventative measures taken.

C) Odor Log [County Rule 210 §302.1e(1)][County Rule 320]
The Permittee shall include a copy of the portion of the odor log that covers the applicable 6 month reporting period. If no complaints were received during the reporting period, a statement to that effect may be substituted for the copy of the odor log.

D) Spray Coating [County Rule 210 §302.1e][County Rule 315]
1) If the Permittee operates spray coating equipment inside an enclosure without forced air exhaust, the Permittee shall provide a statement certifying the following:
   a) That the enclosure has at least three sides that are a minimum of eight feet in height;
   b) That no spraying was conducted within three feet of any open end, or within two feet of any open top of the enclosure; and
   c) That the spray is directed in a horizontal or downward pointing manner for three-sided enclosures, or away from any opening for complete enclosures and three-sided enclosures with roofs.
2) If the Permittee operated spray coating equipment with a filtering system on a spray booth or enclosure with forced air exhaust, the Permittee shall provide a statement certifying the following:
   a) That each filter installed on a spray booth or enclosure was inspected for gaps, sags or holes once daily for each day that the booth was operated;
   b) That all filters that were observed to have gaps, sags or holes were immediately replaced; and
   c) Details of the make and manufacturer of each filter used as well as its overspray

control efficiency.

3) The Permittee shall provide a statement certifying that no spraying occurred outside of any enclosures required by these Permit Conditions outside of the buildings.

4) If such certifications can not be provided as described in subsections 1 through 3 above, the Permittee shall identify the reasons and shall instead submit a statement detailing any corrective action taken.

E) Walkaround Reporting

1) Visible Emissions [County Rule 210 §302.1e][County Rule 311]

a) Dates of any week that the required visible emissions observations were not taken, an explanation for the deviation from that monitoring requirement, and a description of any action taken to ensure that the future observations are performed, if applicable.

b) If visual emissions were observed during the reporting period, the following information shall be provided:

(1) Dates on which visible emissions were observed and a description of the source of the emissions;
(2) The approximate time of the observation;
(3) Name of the observer;
(4) A description of any corrective actions taken, including date taken, if applicable; and
(5) If follow-up Method 9 readings were required, the opacity of the emissions determined by Method 9 and a copy of the visual determination of opacity record showing all information required by the Method 9.

2) VOC emissions [County Rule 210 §302.1e]

The Permittee shall report information found and documented during the weekly walk-through regarding the storage of VOC containing materials including:

(1) Weeks when no walk-through was performed and the reason.
(2) Instances of unnecessary VOC evaporation found and corrective actions taken.
(3) Any instances of materials containing more than 10 percent VOC content used in cleaning solutions.

F. Solvent Cleaning

[County Rule 210 §302.1e(1)]

The Permittee shall include the following information in each semi-annual monitoring report;

1) A summary of the listed cleaning-solvents currently used at the facility with the VOC-content of each cleaning solvent stated in VOC per gallon of material or grams per liter of material;
2) A summary of any testing that may have been performed during the period.
3) A summary of the log used for recording visual observations of the cleaning machines including the following information:

a) dates and times when the observations were conducted,
b) whether or not the cleaning machines were in compliance with operational requirements.
c) If not in compliance, a description of any corrective actions taken will be included.

22. NATIONAL EMISSION STANDARD FOR HAZARDOUS AIR POLLUTANTS FOR REINFORCED PLASTIC COMPOSITES PRODUCTION REQUIREMENTS

The following permit conditions concerning the NESHAP standard for Subpart WWWW become an applicable requirement to the Permittee as of April 21, 2006.

A. AFFECTED SOURCE

1) The affected source for these permit conditions consists of all parts of the facility engaged in open molding, closed molding, centrifugal casting, continuous casting, polymer casting, pultrusion, sheet molding compound (SMC) manufacturing, mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations on parts the facility manufactures.

[40 CFR §63.5790(b)][County Rule 370 §303.2]

2) The following operations are specifically excluded from any requirements of the NESHAP requirements of these permit conditions for reinforced plastic composites production.

a) Application of mold sealing and release agents
b) Mold stripping and cleaning
c) Repair of parts that were not manufactured at the facility including non-routine manufacturing of parts, personal activities that are not part of the manufacturing operations (such as hobby shops on military bases)
d) Prepreg materials as defined as reinforcing fabric received precoated with resin which is usually cured through the addition of heat.
e) Non-gel coat surface coatings
f) Application of putties, polyputties, and adhesives
g) Repair or production materials that do not contain resin or gel coat
h) Research and development operations as defined in section 112(c)(7) of the CAA.
i) Polymer casting
j) Closed molding operations (except for compression/injection molding)

[40 CFR §63.5790(b)][County Rule 370 §303.2]

B. COMPLIANCE DEMONSTRATIONS

1) The Permittee shall comply with the following permit conditions pertaining to the NESHAP requirements for reinforced plastic composites production and the applicable work practice standards located in Table 22.3 by no later than April 21, 2006.

[40 CFR §63.5800][County Rule 370 §303.2]

2) The Permittee shall show initial compliance with NESHAP for reinforced plastic composites by one of the following;

[40 CFR §63.5860] [40 CFR 63Subpart WWWW Table 8] [County Rule 370 §303.2]

a) Meeting the appropriate organic HAP emission limits for these operations as calculated using the procedures in the 40 CFR §63.5810 on a 12-month rolling average 1 year after April 21, 2006, or
b) Demonstrate initial compliance by using the appropriate values in Tables 22.2, or 22.4 of these permit conditions that all resins and gel coats considered individually meet the appropriate organic HAP contents, or
c) Demonstrate initial compliance by using the appropriate values in Table 22.4 of these permit conditions that the weighted average of all resins and gel coats for

each resin type and application method meet the appropriate organic HAP contents.

3) The Permittee shall demonstrate continuous compliance with each standard that applies to the facility using the following methods;

[40 CFR §63.5900][County Rule 370 §303.2]

a) Compliance with organic HAP emissions limits in Table 22.2 or organic HAP content limits in Table 22.4, as applicable, is demonstrated by:
   (1) Compliance with the organic HAP emissions limits in Table 22.2 is demonstrated by maintaining an organic HAP emission factor value less than or equal to the appropriate organic HAP emissions limit listed in Table 22.2 of this permit, on a 12-month rolling average, or by including in each compliance report a statement that all resins and gel coats meet the appropriate organic HAP emissions limits: or
   (2) Compliance with the organic HAP emissions limits in Table 22.4 is demonstrated by maintaining an average organic HAP content value less than or equal to the appropriate organic HAP contents listed in Table 22.4 of this permit, on a 12-month rolling average, or by including in each compliance report a statement that all resins and gel coats individually meet the appropriate organic HAP emissions limits
b) Compliance with the work practice standards in Table 22.3 to these permit conditions is demonstrated by performing the work practice required for the affected source.
c) The Permittee must report each deviation from each permit condition that is applicable. The deviations must be reported according to the requirements in 40 CFR § 63.5910.
d) The Permittee shall meet the organic HAP emissions limits and work practice standards that are applicable.

C. ALLOWABLE EMISSIONS LIMITATIONS

1) The Permittee shall meet the annual average organic HAP emissions limits in Table 22.2 or the organic HAP content limits in Table 22.4, as applicable.

[40 CFR §63.5835][County Rule 370 §303.2]

D. OPERATIONAL LIMITATIONS AND STANDARDS

1) The Permittee shall meet the work practice standards in Table 22.3.

[40 CFR §63.5835(a)][County Rule 370 §303.2]

2) The Permittee shall operate and maintain the affected source in accordance with 40 CFR §63.6(e)(1)(i)

[40 CFR §63.5835(c)][County Rule 370 §303.2]

E. OPTIONS FOR MEETING STANDARDS

[40 CFR §63.5810][County Rule 370 §303.2]

The Permittee shall use one of the following methods in paragraphs 1) through 4) of this section to meet the standards for open molding operations in Table 22.2 of these permit conditions. The Permittee may use different compliance options for the different operations listed in Table 22.2. The necessary calculations must be completed within 30 days after the end of each month. The Permittee may switch between the compliance options in

paragraphs 1) through 4) of this permit condition. When there is a change to an option based on a 12-month rolling average, the Permittee must base the average on the previous 12 months of data calculated using the compliance option that the Permittee is changing to, unless the previous option did not require maintaining records of resin and gel coat use. In this case, the Permittee must immediately begin collecting resin and gel coat use data and demonstrate compliance 12 months after changing options.

1) Demonstrate That an Individual Resin or Gel Coat, As Applied, Meets the Applicable Emissions Limit in Table 22.2 of this Permit

[40 CFR §63.5810(a)][County Rule 370 §303.2]

a) The Permittee shall calculate your actual organic HAP emissions factor for each different process stream within each operation type. A process stream is defined as each individual combination of resin or gel coat, application technique, and control technique. Process streams within operations types are considered different from each other if any of the following four characteristics vary: the neat resin plus or neat gel coat plus organic HAP content, the gel coat type, the application technique, or the control technique. The Permittee must calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Table 22.1 to these permit conditions for open molding or site specific organic HAP emissions factors discussed in 40 CFR §63.5796. The emission factor calculation should include any and all emission reduction techniques used including any add on controls. If the Permittee is using vapor suppressant effectiveness (VSE) by conducting testing according to the procedures specified in appendix A to subpart WWWW of 40 CFR part 63.

b) If the calculated emission factor is less than or equal to the appropriate emission limit, you have demonstrated that this process stream complies with the emission limit in Table 22.2 to this permit. It is not necessary that all the Permittee's process streams, considered individually, demonstrate compliance to use this option for some process streams. However, for any individual resin or gel coat the Permittee uses, if any of the process streams that include that resin or gel coat are to be used in any averaging calculations described in paragraphs 2) through 4) of this condition, then all process streams using that individual resin or gel coat must be included in the averaging calculations.

2) Demonstrate That On Average, the Permittee meets the Individual Organic Hap Emissions Limits for Each Combination of Operation Type and Resin Application Method or Gel Coat Type

Demonstrate that on average, the Permittee meets the individual organic HAP emissions limits for each unique combination of operation type and resin application method or gel coat type shown in Table 22.2 to this permit that applies to the Permittee

[40 CFR §63.5810(b)][County Rule 370 §303.2]

a) The Permittee shall group the process streams described in permit condition 22.E.1) by operation type and resin application method or gel coat type listed in Table 22.2 to this permit and then calculate a weighted average emission factor based on the amounts of each individual resin or gel coat used for the

last 12 months. To do this, sum the product of each individual organic HAP emissions factor calculated in permit condition 22.E.1)a) and the amount of neat resin plus and neat gel coat plus usage that corresponds to the individual factors and divide the numerator by the total amount of neat resin plus and neat gel coat plus used in that operation type as shown in Equation 22.1 of this condition.

Equation 22.1

[40 CFR §63.5810][County Rule 370 §303.2]

$$\text{Average organic HAP Emissions Factor} = \frac{\sum_{i=1}^{n} (\text{Actual Process Stream EF}_i * \text{Material}_i)}{\sum_{i=1}^{n} \text{Material}_i}$$

Where:

Actual Process Stream EF_i =	actual organic HAP emissions factor for process stream i, lbs/ton;
$Material_i$ =	neat resin plus or neat gel coat plus used during the last 12 calendar months for process $stream_i$,tons;
n =	number of process streams where you calculated an organic HAP emissions factor.

The Permittee may, but is not required to, include process streams where the Permittee has demonstrated compliance as described in condition 22.E.1) of this permit, subject to the limitations described in condition 22.E.1)b) of this permit, and the Permittee is not required to and should not include process streams for which the Permittee will demonstrate compliance using the procedures in paragraph 22.E.4) of this permit.

b) The Permittee shall compare each organic HAP emissions factor calculated in paragraph 22.E.2)a) of this section with its corresponding organic HAP emissions limit in Table 22.2 to this subpart. If all emissions factors are equal to or less than their corresponding emission limits, then the Permittee is in compliance.

3) Demonstrate Compliance with a Weighted Average Emission Limit

[40 CFR §63.5810(c)][County Rule 370 §303.2]

The Permittee shall demonstrate each month that each weighted average of the organic HAP emissions limits in Table 22.2 to this permit are met that apply to it. When using this option, the Permittee must demonstrate compliance with the weighted average organic HAP emissions limit for all its open molding operations, and then separately demonstrate compliance with the weighted average organic HAP emissions limit for the centrifugal casting operations. Open molding operations and centrifugal casting operations may not be averaged with each other.

a) Each month the Permittee shall calculate the weighted average organic HAP emissions limit for all open molding operations for the facility for the last 12-month period to determine the organic HAP emissions limit the Permittee must meet. To do this, multiply the individual organic HAP emissions limits in Table 22.2 to this permit for each open molding operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding operation type, sum these results, and then divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding over the last 12 months as shown in Equation 22.2 of this section.

Equation 22.2

[40 CFR §63.5810][County Rule 370 §303.2]

$$\text{Weighted Average Emission Limit} = \frac{\sum_{i=1}^{n}(EL_i * Material_i)}{\sum_{i=1}^{n} Material_i}$$

Where:

El_i = organic HAP emissions limit for operation type i, lbs/ton from Tables 22.2 to this permit;

$Material_i$ = neat resin plus or neat gel coat plus used during the last 12-month period for operation type i, tons;

n = number of operations.

b) Each month calculate the Permittee's weighted average organic HAP emissions factor for open molding. To do this, multiply the actual open molding operation organic HAP emissions factors calculated in condition 22.E.2)a) and the amount of neat resin plus and neat gel coat plus used in each open molding operation type, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding operations as shown in Equation 22.3 of this section.

Equation 22.3:

[40 CFR §63.5810][County Rule 370 §303.2]

$$\text{Actual Weighted Average Organic HAP Emissions Factor} = \frac{\sum_{i=1}^{n}(\text{Actual Operation } EF_i * Material_i)}{\sum_{i=1}^{n} Material_i}$$

Where:

Actual Individual EF_i = Actual organic HAP emissions factor for operation type i, lbs/ton;

$Material_i$ = neat resin plus or neat gel coat plus used during the last 12 calendar months for operation type i, tons;

n = number of operations.

c) The Permittee shall compare the values calculated in paragraphs 3)a) and b) of this section. If each 12-month rolling average organic HAP emissions factor is less than or equal to the corresponding 12-month rolling average organic HAP emissions limit, then the Permittee is in compliance.

4) Meet the Organic Hap Emissions Limit for One Application Method and Use the Same Resin(s) for all Application Methods of that Resin Type.

[40 CFR §63.5810(d)][County Rule 370 §303.2]

This option is limited to resins of the same type. The resin types for which this option may be used are noncorrosion-resistant, corrosion-resistant and/or high strength, and tooling.

a) For any combination of manual resin application, mechanical resin application, filament application, or centrifugal casting, the Permittee may elect to meet the organic HAP emissions limit for any one of these application methods and use the same resin in all of the resin application methods listed in condition 22.E.4)a). Table 22.4 to this permit presents the possible combinations based on a facility selecting the application process that results in the highest allowable organic HAP content resin. If the resin organic HAP content is below the applicable value shown in Table 22.4, the resin is in compliance.

b) The Permittee may also use a weighted average organic HAP content for each application method described in permit condition 22.E.4)a). Calculate the weighted average organic HAP content monthly. Use Equation 22.1 except substitute organic HAP content for organic HAP emissions factor. The Permittee is in compliance if the weighted average organic HAP content based on the last 12 months of resin use is less than or equal to the applicable organic HAP contents in Table 22.4 to this permit.

c) The Permittee may simultaneously use the averaging provisions in paragraph 2) or 3) of this condition to demonstrate compliance for any operations and/or resins that the Permittee does not include in its compliance demonstrations in paragraphs 4)a) and b) of this condition. However, any resins for which the Permittee claims compliance under the option in paragraphs 4)a) and b) of this condition may not be included in any of the averaging calculations described in paragraph 2) or 3) of this condition.

d) The Permittee does not have to keep records of resin use for any of the individual resins where compliance is demonstrated under the option in paragraph 4)a) of this condition unless the Permittee elects to include that resin in the averaging calculations described in paragraph 4)b) of this condition.

F. MONITORING AND RECORDKEEPING REQUIREMENTS

[40 CFR §63.5797][County Rule 370 §303.2]

1) In order to determine the organic HAP content of resins and gel coats, the Permittee shall rely on information provided by the material manufacturer, such as manufacturers formulation data or material safety data sheets, (MSDS), or using the procedures specified in paragraphs a) through c) of this section, as applicable.
   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.
   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 determine compliance.
   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 determine compliance.

2) Required Records [40 CFR §63.5915][County Rule 370 §303.2]

   a) The Permittee shall keep the following records:
      (1) A copy of each notification and report that was submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted
      (2) The Permittee shall keep all data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in Tables 22.2, and 22.4 to these permit conditions.
      (3) The Permittee shall keep a certified statement that the facility is in compliance with the work practice requirements in Table 22.3 to these permit conditions, as applicable.

   b) The Permittee shall maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to 40 CFR § 63.10(b)(1).
   [40 CFR §63.5920(a)][County Rule 370 §303.2]

   c) The Permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
   [40 CFR §63.5915][County Rule 370 §303.2]

   d) 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,

according to 40 CFR § 63.10(b)(1). You can keep the records offsite for the remaining 3 years.

[40 CFR §63.5920][County Rule 370 §303.2]

e) The Permittee may keep records 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][County Rule 370 §303.2]

G. REPORTING REQUIREMENTS

1) Initial Compliance with Work Practice Standards

The Permittee shall submit a certified statement in the notice of compliance status to the Department no later than April 21, 2006 that includes the following:

a) That all cleaning materials, except styrene contained in closed systems, or materials used to clean cured resin from application equipment contain no HAP.
b) That all HAP-containing storage containers are kept closed or covered except when adding or removing materials, and that any bulk storage tanks are vented only as necessary for safety.
c) That the mixers are not actively vented to the atmosphere when the agitator is turning, except when adding materials or as necessary for safety.
d) That all mixer covers (if applicable) are closed during mixing except when adding materials to the mixers, and that gaps around mixer shafts and required instrumentation are less than 1 inch.
e) That the mixers (if applicable) are closed except when adding materials to the mixing vessels
f) That the facility has commenced collecting all necessary data to show compliance with these permit conditions

[40 CFR §63.5860(a)][County Rule 370 §303.2

2) Initial Startup Notification

The Permittee that has an initial startup before the effective date of subpart WWWW shall notify the Administrator and the Control Officer in writing that the source is subject to the relevant standard. The notification, which shall be submitted not later than 120 calendar days after the effective date of subpart WWWW (or within 120 calendar days after the source becomes subject to the standard), shall provide the following information:

a) The name and address of the Permittee;
b) The address (i.e., physical location) of the affected source;
c) An identification of subpart WWWW as a relevant standard or other requirement, that is the basis of the notification and the source's compliance date;
d) A brief description of the nature, size, design, and method of operation of the source and an identification of the types of emission points within the affected source subject to the relevant standard and types of hazardous air pollutants emitted; and
e) A statement of whether the affected source is a major source or an area source.

[40 CFR §63.5905(a)][County Rule 370 §303.2

3) Notification of compliance status

a) The Permittee shall submit to the Administrator and the Control Officer 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 the following--

(1) The methods that were used to determine compliance;

(2) The results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;

(3) The methods that will be used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods;

(4) 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 and in accordance with the test methods specified in the relevant standard;

(5) If the relevant standard applies to both major and area sources, an analysis demonstrating whether the affected source is a major source (using the emissions data generated for this notification);

(6) 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

(7) A statement by the Permittee as to whether the source has complied with the relevant standard or other requirements.

[40 CFR §63.5905(a)] [40 CFR §63.9 (h)] [County Rule 370 §303.2

b) If the Permittee using the organic HAP emissions limit averaging option to comply with the standard, the notification of compliance status requirements must be submitted no later than 1 year plus 30 days after the facility's compliance date.

[40 CFR §63.5905(a)][County Rule 370 §303.2

c) If the Permittee is complying by using the organic HAP content limits, application equipment requirements, or the organic HAP emissions limits other than the organic HAP emissions limit averaging to comply with the standard, the notification of compliance requirements must be submitted no later than 30 days after the facility's compliance date.

[40 CFR §63.5905(a)][County Rule 370 §303.2

d) The notification of compliance must be postmarked on or before the day the compliance notification is due.

[40 CFR §63.5905(a)][County Rule 370 §303.2

e) If the Permittee changes any information submitted in any notification, the Permittee must submit the changes in writing to the Administrator within 15 calendar days after the change.

[40 CFR §63.5905(b)][County Rule 370 §303.2

4) Semiannual Compliance Report

a) The first compliance report shall cover the period beginning on April 21, 2006 and ending on December 31, 2006.

[40 CFR §63.5910(b)][County Rule 370 §303.2

b) The first compliance report must be postmarked or delivered no later than January 31, 2007.

[40 CFR §63.5910(b)][County Rule 370 §303.2

c) Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

[40 CFR §63.5910(b)][County Rule 370 §303.2

d) Each subsequent compliance report must 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.

[40 CFR §63.5910(b)][County Rule 370 §303.2

e) The Permittee may submit the first and subsequent compliance reports according to the dates the Department has established instead of according to the dates in paragraphs 4)a) through d) of this section.

[40 CFR §63.5910(b)][County Rule 370 §303.2

f) The compliance report must contain all the information:
   (1) Company name and address.
   (2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
   (3) Date of the report and beginning and ending dates of the reporting period.
   (4) If there are no deviations from any organic HAP emissions limitations (emissions limit and operating limit) that apply and there are no deviations from the requirements for work practice standards in Table 22.3 to these permit 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)][County Rule 370 §303.2

g) 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 that occurs at the facility, the compliance report must contain the following information:
   (1) The total operating time of each affected source during the reporting period.
   (2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

[40 CFR §63.5910(d)][County Rule 370 §303.2

h) The Permittee shall report if there is an exceedance of 100 tpy of total organic HAP emissions

[40 CFR §63.5910(f)][County Rule 370 §303.2

i) The Permittee must report all deviations as defined in these permit conditions in the semiannual monitoring report. If the Permittee submits a compliance report pursuant to the NESHAP subpart WWWW along with, or as part of, the

semiannual monitoring report required by the Title V permitting requirements, and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation (including any operating limit) or work practice requirement in the NESHAP subpart WWWW, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the Permittee may have to report deviations from permit requirements to the Department.

[40 CFR §63.5910(g)][County Rule 370 §303.2

TABLE 22.1: Equations to Calculate Organic HAP Emission Factors for Specific Open Molding[1]

If your operation type is a new or existing.....	And you use.....	With.....	Use this organic HAP Emissions Factor (EF) Equation for materials with less than 33 percent organic HAP (19 percent organic HAP for non-atomized gel coat)[2,3]	Use this organic HAP Factor (EF) Equation for materials with 33 percent or more organic HAP (19 percent for non-atomized gel coat)[2,3]
1. Open molding operation.....	a. Manual resin application.	i. Non-vapor-suppressed resin. ii. Vapor- suppressed resin.	EF = 0.126 x % HAP x 2000. EF = 0.126 x % HAP x 2000 x (1 – (0.5 x VSE factor)).	EF = ((0.286 x %HAP)-0.0529)x 2000 EF = ((0.286 x % HAP)-0.0529) x 2000 x (1 – (0.5 x VSE factor)).

[1] The equations in this table are intended for use in calculating emission factors to demonstrate compliance with the emission limits in subpart WWWW. These equations may not be the most appropriate method to calculate emission estimates for other purposes. However, this does not preclude a facility from using the equations in this table to calculate emission factors for purposes other than rule compliance if these equations are the most accurate available.

[2] Percent HAP means total weight percent of organic HAP (styrene, methyl methacrylate, and other organic HAP) in the resin or gel coat prior to the addition if fillers, catalyst, and promoters. Input the percent HAP as a decimal, i.e., 33 percent HAP should be 0.33, not 33.

[3] The VSE factor means the percent reduction in organic HAP emissions expressed as a decimal measured by the VSE test method of appendix A to subpart WWWW.

[4] This equation is based on a organic HAP emissions factor equation developed for mechanical atomized controlled spray. It may be only used for automated or robotic spray systems with atomized spray. All spray operations using hand held spray guns must use the appropriate mechanical atomized or mechanical non-atomized organic HAP emission factor equation. Automated or robotic spray systems using nonatomized spray should use the appropriate nonatomized mechanical resin application.

		iii. Vacuum bagging/ Closed mold curing with-out rollout.	EF = 0.126 x % HAP x 2000 x 0.8.	EF = ((0.286 x % HAP)-0.0529) x 2000 x 0.8.
		iv. Vacuum bagging / closed-mold curing without roll out.	EF = 0.126 x % HAP x 2000 x 0.5.	EF = ((0.286 x % HAP)-0.0529) x 2000 x 0.5.
	b. Atomized mechanical resin application	i. non-vapor-suppressed resin.	EF = 0.169 x % HAP x 2000.	EF = ((0.714 x %HAP)-0.18)x 2000
		ii. Vapor-suppressed resin.	EF = 0.169 x % HAP x 2000 x (1 – (0.45 x VSE factor)).	EF = ((0.714 x % HAP)-0.18) x 2000 x (1 – (0.45 x VSE factor)).
		iii. Vacuum bagging / closed-mold curing with roll out.	EF = 0.169 x % HAP x 2000 x 0.85.	EF = ((0.714 x % HAP)-0.18) x 2000 x 0.85.
		iv. Vacuum bagging / closed-mold curing with-out roll out.	EF = 0.169 x % HAP x 2000 x 0.55.	EF = ((0.714 x % HAP)-0.18) x 2000 x 0.55.
	c. Non-atomized mechanical resin application	i. Non-vapor suppressed resin.	EF = 0.107 x % HAP x 2000.	EF = ((0.157 x % HAP)-0.0165) x 2000.
		ii. Vapor suppressed resin.	EF = 0.107 x % HAP x 2000 x (1-(0.45 x VSE factor.	EF = ((0.157 x % HAP)-0.0165) x 2000 x (1-(0.45 x VSE factor)).
		iii. Closed-mold curing with roll out.	EF = 0.107 x % HAP x 2000 x 0.85.	EF = ((0.157 x % HAP)-0.0165) x 2000 x 0.85.
		iv. Vacuum bagging / closed-mold curing with-out roll-out.	EF = 0.107 x % HAP x 2000 x 0.55.	EF = ((0.157 x % HAP)-0.0165) x 2000 x 0.55.
	d. Atomized mechanical resin application with robotic or automated spray control[4]	Non-vapor suppressed resin	EF = 0.169 x % HAP x 2000 x 0.77.	EF = 0.77 x ((0.714 x % HAP)-0.18) x 2000.
	e. Filament application ...[5]	i. Non-vapor-suppressed resin.	EF = 0.184 x % HAP x 2000.	EF = ((0.2746 x % HAP)-0.0298) x 2000.
		ii. Vapor-suppressed resin.	EF = 0.12 x % HAP x 2000.	EF = ((0.2746 x % HAP)-0.0298) x 2000 x 0.65.
	f. Atomized spray gel coat application.	Non-vapor-suppressed gel coat.	EF = 0.445 x % HAP x 2000.	EF = ((1.03646 x % HAP)-0.195) x 2000.
	g. Non-atomized spray gel coat application.	Non-vapor-suppressed gel coat.	EF = 0.185 x % HAP x 2000.	EF = ((0.4506 x % HAP)-0.0505) x 2000.
	h. atomized spray gel coat application using robotic or automated spray.	Non-vapor-suppressed gel coat.	EF = 0.445 x % HAP x 2000 x 0.73.	EF = ((1.03646 x % HAP)-0.195) x 2000 x 0.73.

[5] Applies only to filament application using an open resin bath. If resin is applied manually or with a spray gun, use the appropriate manual or mechanical application organic HAP emission factor equation.

TABLE 22.2: Organic Hap Emission Limits for Specific Open Molding, Centrifugal Casting, Pultrusion and Continuous Lamination / Casting Operations

Operation…	And you use…	Organic HAP emission limit (lb/ton)[1]
1. Open Molding - CR/HS	a. Mechanical resin application b. Filament application c. Manual resin application	113 171 123
2. Open Molding – non-CR/HS	a. Mechanical resin application b. Filament application c. Manual resin application	88 188 87
3. Open Molding - Tooling	a. Mechanical resin application b. Manual resin application	254 157
4. Open Molding – low-flame spread/low smoke products	a. Mechanical resin application b. Filament application c. Manual resin application	497 270 238
5. Open Molding – shrinkage controlled resins[2]	a. Mechanical resin application b. Filament application c. Manual resin application	354 215 180
6. Open Molding gel coat[3]	a. Tooling gel coating b. White/off white pigmented gel coating c. All other pigmented gel coating d. CR/HS or high performance gel coat e. Fire retardant gel coat f. clear production gel coat	440 267 377 605 854 522

[1] Organic HAP emissions limits for open molding and centrifugal casting are expressed as lb/ton. You must be at or below these values based on a 12-month rolling average.

[2] This emission limit applies regardless of whether the shrinkage controlled resin is used as a production resin or tooling resin.

[3] If you apply gel coat with manual application, for compliance purposes treat he gel coat as if it were applied using atomized spray guns to determine both emission limits and emission factors. If you use multiple application methods and any portion of a specific gel coat is applied using nonatomized spray, you may use the nonatomized spray gel coat equation to calculate an emission factor for the manually applied portion of that gel coat. Otherwise, use the atomized spray gel coat application equation to calculate emission factors.

Table 22.3: Work Practice Standards

For…	The Permittee shall…
1. A new or existing closed molding operation using compression / injection molding.	Uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.
2. A new or existing cleaning operation….	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.
3. A new or existing materials HAP-containing materials storage operation	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.
4. An existing or new mixing or new SMC manufacturing operation	Close or cover the resin delivery system to the doctor box on each SMC manufacturing machine. The doctor box itself may be open.
5. An existing or new SMC manufacturing operation.	Use a nylon containing film to enclose SMC.
6. All mixing or BMC manufacturing operations[1]	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.
7. All mixing or BMC manufacturing operations	Close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95 percent efficient control device are exempt from this requirement.
8. All mixing or BMC manufacturing operations.	Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

[1] Containers of 5 gallons or less may be open when mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin). For polymer casting mixing operations, containers with a surfacr area of 500 square inches or less may be open while active mixing is taking place.

9. A new or existing pultrusion operation manufacturing parts that meet the following criteria: 1,000 or more reinforcements or the glass equivalent of 1,000 ends of yield roving or more; and have a cross sectional area of 60 square inches or more that is not subject to the 95 percent organic HAP emission reduction requirement.	i. not allow vents from the building ventilation system, or local or portable fans to blow directly on or across the wet-out area(s), ii. not permit point suction of ambient air in the wet-out area(s) unless that air is directed to a control device, iii. use devices such as deflectors, baffles, and curtains when practical to reduce air flow velocity across the wet-out area(s), iv. direct any compressed air exhausts away from resin and wet-out area(s), v. convey resin collected from drip-off pans or other devices to reservoirs, tanks, or sumps via covered troughs, pipes, or other covered conveyance that shields the resin from the ambient air, vi. cover all reservoirs, tanks, sumps, or HAP-containing materials storage vessels except when they are being charged or filled, and vii. cover or shield from ambient air resin delivery systems to the wet-out area(s) from reservoirs, tanks, or sumps where practical.

TABLE 22.4: Options Allowing the Same Resin across Different Operations that use the same Resin Type

If the facility has the following resin type and application method.....	The highest resin weight percent organic HAP content, or weighted average weight percent HAP content, allowable for.....	Is.....
1. CR/HS resins, non-atomized mechanical	a. CR/HS mechanical	48.0
	b. CR/HS filament application	48.0
	c. CR/HS manual	48.0
2. CR/HS resins, nonatomized mechanical	a. CR/HS filament application	46.4
	b. CR/HS manual	46.4
3. CR/HS resins filament application	CR/HS manual	42.0
		38.4
4. Non- CR/HS resins, filament application	a. Non- CR/HS mechanical	45.0
	b. Non- CR/HS manual	45.0
	c. Non- CR/HS centrifugal casting	45.0
5. Non- CR/HS resins, non-atomized mechanical	a. Non- CR/HS manual	38.5
	b. Non- CR/HS centrifugal casting	38.5
6. Non- CR/HS resins, centrifugal casting	Non- CR/HS manual	37.5
7. Tooling resins, non-atomized mechanical	Tooling manual	91.4
8. Tooling resins, manual	Tooling atomized mechanical	45.9

SPECIFIC CONDITIONS FOR POTENTIAL SUPPORT ACTIVITIES

23. PERMIT CONDITIONS FOR ARCHITECTURAL COATING

A. Operational Limitations and Standards

1) The Permittee shall limit the volatile organic compound (VOC) content of architectural coatings as follows:

a) Bituminous Pavement Sealer

[County Rule 335 §301][SIP Rule 335 §301]

The Permittee shall not apply any architectural coating manufactured after July 13, 1988, which is recommended for use as a bituminous pavement sealer unless it is an emulsion type coating.

b) Non-Flat Architectural Coating

[County Rule 335 §303][SIP Rule 335 §303]

The Permittee shall not apply any non-flat architectural coating manufactured after July 13, 1990, which contains more than 2.1 lbs (250 g/l) of volatile organic compounds per gallon of coating, excluding water and any colorant added to tint bases. These limits do not apply to specialty coatings listed below.

c) Flat Architectural Coating [County Rule 335 §304][SIP Rule 335 §304]

The Permittee shall not apply any flat architectural coating manufactured after July 13, 1989, which contains more than 2.1 lbs (250 g/l) of volatile organic compounds per gallon of coating, excluding water and any colorant added to tint bases. These limits do not apply to specialty coatings listed below.

d) Specialty Coatings [County Rule 335 §305][SIP Rule 335 §305]

The Permittee shall not apply any architectural coating manufactured after July 13, 1991 that exceeds the following limits. The limits are expressed in pounds of VOC per gallon of coating as applied, excluding water and any colorant added to tint bases.

COATING	(lb/gal)
Concrete Curing Compounds	2.9
Dry Fog Coating	
Flat	3.5
Non-flat	3.3
Enamel Undercoaters	2.9
General Primers, Sealers and Undercoaters	2.9
Industrial Maintenance Primers and Topcoats	
Alkyds	3.5
Catalyzed Epoxy	3.5
Bituminous Coating Materials	3.5
Inorganic Polymers	3.5
Vinyl Chloride Polymers	3.5
Chlorinated Rubbers	3.5
Acrylic Polymers	3.5
Urethane Polymers	3.5
Silicones	3.5
Unique Vehicles	3.5
Lacquers	5.7
Opaque Stains	2.9
Wood Preservatives	2.9
Quick Dry Enamels	3.3
Roof Coatings	2.5
Semi-transparent Stains	2.9
Semi-transparent and Clear Wood Preservatives	2.9
Opaque Wood Preservatives	2.9
Specialty Flat Products	3.3
Specialty Primers, Sealers & Undercoaters	2.9
Traffic Coatings	
Applied to Public Streets and Highways	2.1
Applied to other Surfaces	2.1
Black Traffic Coatings	2.1
Varnishes	2.9
Waterproof Mastic Coating	2.5
Waterproof Sealers	3.3

e) Exemptions

[County Rule 335 §§306and 307][SIP Rule 335 §§306and 307]

The VOC content requirement of this Section shall not apply to the following:

(1) Architectural coatings supplied in containers having capacities of one quart or less.

(2) Architectural coatings recommended by the manufacturer for use solely as one or more of the following:

(a) Below ground wood preservative coatings.

(b) Bond breakers.

(c) Fire retardant coatings.

(d) Graphic arts coatings (sign paints)

(e) Mastic texture coatings.

(f) Metallic pigmented coatings.
(g) Multi-colored paints.
(h) Quick-dry primers, sealers and undercoaters.
(i) Shellacs.
(j) Swimming pool paints.
(k) Tile-like glaze coatings.

B. Monitoring and Recordkeeping Requirements

[County Rule 210 §302.1c] [County Rule 210 §302.1e]

The Permittee shall keep a material list of all coatings used. The material list shall contain the name of each coating, a short description of the material, the pounds of VOCs per gallon of coating excluding water and colorant added to tint bases, and the amount of each coating used. If the coating is exempt from the volatile organic compounds content requirements, the justification for the determination shall be documented and kept on file.

C. Reporting Requirements [County Rule 210 §302.1e]

The Permittee shall include a statement whether or not architectural coating was performed during the six month reporting period in the semi-annual monitoring report. The statement shall certify that all materials used for architectural coatings comply with the requirements of Rule 335. If such certification can not be made, the Permittee shall submit a statement listing the non-complying materials and any corrective actions taken.

END OF PERMIT

Appendix A
List of Equipment
Marlam Industries, Inc.
V97-022

	Name	Make	Model	Serial No.#	Inst. Date	Size/Capacity	Type
1	Extruder	Agglomerated				75 lbs/minute	Stone Reinforced Polyester Thermoset
2	Gelcoat/Chop Booth	Gruber				15,400 CFM	filtered exhaust
3	Gelcoat/Chop Booth	Gruber				15,400 CFM	filtered exhaust
4	Gelcoat/Chop Booth	Gruber				15,400 CFM	filtered exhaust
5	Batch Mixer	Essick				1 cubic yard	
6	(8) Batch Mixers	M-61				5 gallon	
7	Spray Booth	Bechtold	TSU 60			15,400 CFM	laminating line
8	Clean Machine	Cook					Composites and Polymers Marble
9	Natural Gas Burner					200,000 Btu/hr	Heat tunnel
10	Natural Gas Burner					250,000 Btu/hr	Heat tunnel
11	Storage Tank					7,405 gallons	
12	Bench Chop Saw	Chicago				115 Volt, 3200 rpm	
13	Bench Chop Saw	Makita				115 Volt, 4600 rpm	
14	Bench Chop Saw	Makita				115 Volt, 4000 rpm	
15	Laminate Shear		5010	455107		0.33 hp	
16	Min Ram (Form O'Matic)					4.0 hp	
17	Bench Chop Saw	Chicago				115 Volt, 4000 rpm	
18	Bench Chop Saw	Chicago				115 Volt, 4000 rpm	
19	Bench Chop Saw	Chicago				115 Volt, 4000 rpm	
20	Pinch Roll	Ezy-Bold	206			0.5 hp	
21	Core Machine	Evans Machinery	6600			14.0 hp	
22	Gang Rip Saw	Custom				5.67 hp	
23	Miter Saw	Evans Machinery	710	168706		3.125 hp	
24	Miter Saw	Evans Machinery	7100	503410		3.25 hp	
25	Miter Saw	Custom				3.0 hp	
26	Miter Saw	Evans Machinery	710	234404		3.125 hp	

27	Table Saw	Powermatic	68	468013	3.0 hp
28	Table Saw	Powermatic	66	92661806	5.0 hp
29	Table Saw	Powermatic	66	9661600	5.0 hp
30	Table Saw	Powermatic	66	3466772	3.0 hp

Technical Support Document (TSD)
Marlam Industries, Inc.
Permit Number: V97-022

I. COMPANY DESCRIPTION

Marlam Industries Incorporated manufactures kitchen and bath countertops, sinks, shower walls and bathtubs. The major manufacturing processes at Marlam are the fabrication of cultured marble products and laminate/Corian countertops. Marlam was first permitted in 1987 (Permit 8701390).

Company Information:

Facility Name: Marlam Industries Incorporated
Mailing Address: 834 E. Hammond Lane
Phoenix, AZ 85034
Facility Address: 834 E. Hammond Lane
Phoenix, AZ 85034

II. APPLICABLE REQUIREMENTS

A. Facility-wide Emission limits from Installation and Unitary Permits (**Permit Condition 18.A**)

1. Discussion

a) VOC

Volatile Organic Compound (VOC) emissions at the Marlam facility are limited to 10 tons per month and 99 tons per year. The monthly limit was derived by taking the yearly limit and dividing it by 12, and adding 20% to allow operational flexibility.

The source was permitted (Permit #8701390) as a minor source when the major source threshold was 100 tons of VOCs per year. At that time, the source would have gone through non-attainment new source review (NSR) had it been permitted as a major source.

In 1997, Maricopa County was downgraded to "serious" non-attainment area for Ozone, which tightened the major source threshold for VOCs to 50 tons per year. At the time, Marlam was required to submit a Title V application, but was not required to go through NSR.

The limit of 99 tons of VOCs is an applicable requirement to avoid triggering NSR.

2. Monitoring for Compliance with Facility-wide Emissions Limitations

a) The Permittee is required to monitor for compliance with this permit condition by calculating and recording the monthly and 12 month rolling VOC emissions (**Permit Condition 20.A.1)**). For these calculations, it will be assumed that for VOC-containing materials, with the exception of gelcoats and resins, all VOC content is emitted to the atmosphere. The Permittee shall assume 1% of the resin's styrene is emitted when using the extruder. This emission factor was approved by MCESD after consultation with the Composite Manufacturer's Association. This

factor does not apply when the resin is mixed in buckets. In this case, as well as all other resins and gelcoats, the Permittee shall use the emission factors listed on the MCESD "Emissions Inventory Help Sheet for Polyester Resin Applications.", which currently correspond with the UEF (Unified Emission Factors) for Open Molding Composites. The most current emission factors are listed in the Composite Fabricators Association (CFA) website. The tracking of catalysts for the purposes of calculating emissions is not necessary. Catalysts only make up 1% to 2% of the resin or gelcoat material and they consist of a solution of methyl ethyl ketone peroxide dissolved in dimethyl phthalate (DMP). Organic peroxides do not result in measurable VOC emissions, and DMP, which is both a VOC and a HAP, has an extremely low vapor pressure, and is bound up in the resin matrix, resulting in practically no evaporation at room temperature.

The formula used for the monthly calculation for emissions from the gelcoat and resin (VOCs) is:

$$E = (G)(e.f._G) + (R_p)(\%S_R)(e.f._p) + (R_t)(e.f._t) + (R_{to})(e.f._{to})$$

where,

E = total monthly emissions in pounds.

G = monthly usage of gelcoat in pounds.

$e.f._G$ = the combined styrene and MMA emission factors for the gelcoat. This combined emission factor shall be calculated by adding the most recent styrene and MMA emission factors for the gelcoat, as listed in the technical support document (TSD) for this permit or otherwise approved in writing by the control officer. Each individual emission factor is based on percent styrene and MMA contents in the gelcoat.

$\%S_R$ = Emission factor approved by MCESD for the polyester resin when it is mixed in the extruder.

R_p = usage of polyester resin in pounds of neat resin weight (without filler).

$e.f._p$ = the most recent styrene emission factor for the polyester resin, based on percent styrene in the polyester resin, as listed in the technical support document (TSD) for this permit or otherwise approved in writing by the control officer. This emission factor shall be adjusted to reflect whether the resin is mixed in buckets (manually) or in the extruder.

R_t = usage of tub resin in pounds of neat resin weight (without filler).

$e.f._t$ = the most recent sytrene emission factor for the tub resin, based on percent styrene in the tub resin, as listed in the technical support document (TSD) for this permit or otherwise approved in writing by the control officer**.** The Permittee shall use the "mechanical atomized application" emission factors unless records acceptable to the Control Officer are kept demonstrating this is a non-atomized application.

R_{to} = usage of tooling resin in pounds of neat resin weight (without filler).

$e.f._{to}$ = the most recent styrene emission factor for the tooling resin, based on percent sytrene in the tooling resin, as listed in the technical support document (TSD) for this permit or otherwise approved in writing by the control officer.

Since the Permittee has not demonstrated that their tub resin application is non-atomized, they shall use the atomized emission factors for calculating purposes unless they can provide approvable evidence of non-atomized application. All other VOC emissions will be calculated using the manufacturer-supplied data or MSDS information to support the VOC content of each material. If the Permittee wants to account for VOCs not emitted to the atmosphere, disposal records of VOC containing materials are required to be kept.

Emissions of VOC can be calculated using purchase records, but if, in any month, Marlam calculates 12 month rolling VOC emissions of 90 tons or greater, the facility will begin using actual usages instead of purchase records, and will update its monthly VOC calculation each week of the month.

B. County Rule 300 - Opacity Limits (**Permit Condition 18.B**)

1. Discussion

County Rule 300 restricts visible emissions from any source to 20% opacity, other than emissions of uncombined water. County Rule 300 and the 20% opacity limitation of these permit conditions are locally enforceable only. SIP Rule 30 and the 40% opacity limitation of these permit conditions are federally enforceable.

2. Monitoring for Compliance with Opacity Limits

The source's only emission of particulate matter into the ambient air is from the machinery that vents to the Air Sentry dust collector. This dust collector is being considered a voluntary control device by MCESD, since the source has demonstrated it has not been installed to comply with the requirements of Rule 311 (Weight Rate Equation). No pressure drop monitoring will be required, and the Permittee will monitor for compliance with the opacity requirements of this permit by performing a weekly walk around the outside of the facility, looking for visible emissions from the dust collector. (**Permit Condition 20.B.2)a)(1)**).

If emissions are observed, and the Permittee has not had an opacity violation in the 12 months preceding the observation, then the Permittee is required to obtain EPA Method 9 daily readings by a certified reader starting within 3 days of the observation for two weeks, and weekly thereafter until there are no visible emissions. However, if the Permittee takes corrective action and the visible emissions are eliminated before the end of the third day, or if the emissions do no persist and no problem can be identified, the Method 9 reading will not be required. The Permittee is required to document any corrective action taken to reduce or eliminate emissions. If the Permittee has had an occurrence of visible emissions with an opacity of greater than 20%, at any time in the 12 month period preceding the observation, then a certified Method 9 reading is required within 24 hours of the observation. (**Permit Condition 20.B.2)a)(2)**)

A certified Method 9 reading of greater than 20% opacity at any time constitutes a violation of the opacity limitations of the Permit, regardless of whether visible emissions have persisted for three subsequent days.

C. County Rule 330– Operational Requirements for Volatile Organic Compounds (**Permit Condition 19.C)**)

Maricopa County Technical Guidance TG-002 (May 12, 1993) exempts cultured marble manufacturing operations from Rule 330 §§301 and 302.

1. Equipment Cleanup and VOC Containment and Disposal

These permit conditions only apply to the VOCs emitted from the gelcoat and resin operations. VOCs emitted from solvent cleaning are regulated by Rule 331.

When using any cleaning liquids with more than 10% VOC content, the Permittee is required (**Permit Condition 19.C.1)**) to collect used liquids in a closed container, dispose of them in a manner such that no VOCs will be emitted to the atmosphere, and clean equipment in a vat which will remain closed when not in use.

The Permittee is required (**Permit Condition 19.C.2)**) to take the measures to minimize VOC emissions when storing, discarding or disposing of VOC-containing materials. Fresh and waste solvent, and solvent-soaked rags and residues shall be stored in labeled (if 1 gallon or larger) containers when not in used and records of all disposal or recovery must be kept. If any solvent escapes from a container, it must be wiped or removed immediately.

2. Monitoring for Compliance

To monitor for compliance with these requirements, the Permittee will conduct a weekly walk-through the facility and observe that reasonable measures are being taken to prevent VOC evaporation. (**Permit Condition 20.B.2)b)**) Observations will be logged and included in the semiannual report.

A list of all the VOC containing materials used at the facility will be kept stating the VOC content, and monthly records of usage and disposal shall be kept. (**Permit Condition 20.A.3)**)

D. County Rule 320 - Odors and Gaseous Air Contaminants (**Permit Conditions 19.A.1) 19.A.2) and 19.A3)**)

1. Discussion

County Rule 320 §§300, 302 and 303, entitled "Standards", "Material containment Required" and "Reasonable Stack Height Required", respectively, apply to this facility and have been incorporated into the permit conditions.

2. Monitoring for Compliance with Rule 320 Limitations

To monitor for compliance with these requirements, the Permittee is required (**Permit Condition 20.A.2)**) to maintain an odor complaint log containing a description of the complaint, date, time and other information and submit a copy of this log with the semi-annual monitoring report.

Also, as part of a weekly facility walkaround, the Permittee is required (**Permit Condition 20.B.2)b)**) to make sure reasonable measures are being taken to prevent the evaporation of VOCs into the air, including making sure containers are properly covered when not used.

E. County Rule 315 - Spray Coating (**Permit Condition 19.B**)

The permit conditions associated with County Rule 315 - Spray Coating, discussed below, are locally enforceable only. Marlam regularly uses spray coating equipment to apply gel coating to molds and to apply the fiberglass laminate.

1. Discussion

a) Spray Coating Outside Buildings inside Enclosures (**Permit Condition 19.B.1)a)**)

If the Permittee operates any spray coating equipment outside of a building, the Permittee is required to conduct such activities inside an enclosure with at least three sides a minimum eight feet in height. In addition, it is required that

spraying in such enclosures be conducted so that overspray is directed at the walls or floor of the enclosure. No spraying shall be conducted within three feet of any open end and/or within two feet of the top of the enclosure.

b) Spray Coating with Forced Air Exhaust (**Permit Condition 19.B.1)b)**)

For spray coating equipment with forced air exhaust, County Rule 315 and the Permit require the use of a filtering system with an average overspray removal efficiency of 92% by weight. The Permit also requires that there be no gaps, sags or holes in the filters and that all exhaust is discharged to the atmosphere.

2. Monitoring for Compliance

a) Spray Coating Outside Buildings Inside Enclosures (**Permit Condition 20.B.2)c)(1)**)

Marlam will monitor for compliance with these requirements by observing spraying activity inside any enclosure located outside of a building each week to ensure that proper spraying techniques are used. The monitoring is not required any week that the Permittee does not spray in such enclosures.

b) Monitoring for Compliance: Spray Coating with Forced Air Exhaust

According to manufacturer's information provided in the application, the spray filters at Marlam have average paint removal efficiencies for various materials from 96 to 99.5%. To monitor for compliance with the requirements for spray booths with forced air exhaust, Marlam will continue to maintain information indicating the removal efficiency of the spray filters on site. (**Permit Condition 20.B.3)**) The Permittee shall check the filters once per day to make sure there are no gaps or holes and will replace them if necessary. (**Permit Condition 20.B.1)**) Because gel coating and fiberglass spraying are main activities conducted by this facility, an inspection of the filters for gaps, sags or holes is required on each spray booth, each day the particular booth operates. Marlam is required to record the result of the inspections.

The Permittee shall also check weekly for evidence of spraying outside of the booth and record the result of this inspection. (**Permit Condition 20.B.2)c)(2)**)

Particulate matter emissions from the gelcoat spray booths based on best engineering estimates contain little or no PM_{10}. In the fiberglass chop booths, because the process entails the spraying of fiberglass and resins together, the weight of this combination prevents it from staying airborne and depositing either on the piece being fiberglassed or on the filter medium. The Permitee has been conditioned to maintain the filters in the booths at all times to ensure that no fiberglass/resin mixture will be emitted from the stacks to cause an opacity emission.

F. <u>Operational Requirements for Solvent Cleaning Machines – County Rule 331 (**Permit Condition 19.D**)</u>

1. Discussion

This facility's solvent cleaning machines will be properly maintained and operated, leakfree, made of impervious materials and have no openings or ducts where VOCs can escape.

When cleaning with solvents other than Low-VOC or when not using a sealed system, Marlam shall conform to operating requirements regarding the use of comfort fans, removing covers, draining cleaned parts, agitation, materials allowed in a cleaning machine, ventilation rates, vertical speed of mechanical hoists, and cross

contamination. Rule 331 §301 also dictates instructions to be placed on labels or placards on the solvent machines (degreasers).

When not using Low-VOC solvents or sealed systems, conforming solvents are those with a vapor pressure at 68°F not exceeding 1mm Hg.

Wipe cleaning is exempt from all the requirements of Rule 331 except for the recordkeeping provisions of Section 500.

2. Monitoring for Compliance

To monitor for compliance, records of solvents used and their vapor pressures are required (**Permit Condition 20.C**).

Also, as part of the weekly walkaround (**Permit Condition 20.B.2)d)**), the Permittee shall check that all operational requirements for solvent cleaning machines are followed.

G. Reporting Requirements

Reporting requirements for Marlam are found in the General Conditions of the permit (Sections 1-17) and Section 21 of the permit.

Section 21 requires the submission of a semi-annual monitoring report, including deviation reporting. The report should be very detailed and should include information such as any day, week or month that any monitoring was required but not performed, a reason for those deviations, and any action taken to ensure that the monitoring will be performed in the future. Additionally, deviations from specified operating ranges or emission limitations or standards should be included, with any additional information.

To allow the Permittee flexibility in coordinating the filing of semiannual monitoring reports with other data gathering and reporting activities at the facility, the Permittee may select the initial reporting period to be less than 6 months. However, follow-up reporting periods must be in 6-month intervals starting from the end of the initial reporting period.

III. FUTURE APPLICABLE REQUIREMENTS

Proposed regulation 40 CFR 63 Subpart WWWW , Reinforced Plastic Composites will be promulgated soon and will be applicable to Marlam since they are a large source for HAPs.

IV. NON-APPLICABLE REGULATIONS

1. Rule 336

According to Surface Coating Operations Rule 336 §305.1.e, gelcoating is exempt from this rule since it is a polyester coating applied to a polyester composite.

2. Compliance Assurance Monitoring (CAM) (40 CFR 64)

The application shows that Marlam does not use a control device to achieve compliance with any emission limitation or standard for a pollutant for which the source has potential pre-control device emissions greater than or equal to major source levels for that pollutant. Therefore, CAM is not applicable at this facility.

V. POTENTIALLY APPLICABLE REQUIREMENTS

This permit contains conditions Architectural Coating (County Rule 335). These permit conditions have been included to make the Permittee aware of the applicable requirements should these activities be conducted at the facility.

VI. MODELING

Screen3 modeling was conducted for Styrene according to MCESD "Air Toxics/Hazardous Air Pollutant Permitting Procedure" (2/29/00 Draft). The three stacks from where styrene is emitted, are simplified for modeling purposes into one single stack. The hourly emission of styrene was calculated using the hourly usage supplied in the permit application. The following parameters were used for modeling:

Styrene Concentration:	21.63 lb/hr
Building Dimensions:	175'L X 80' W X 18'H (estimated from site visit)
Stack Dimensions:	24' Height, 2.8' Diameter (The height for the gelcoat booths is 24', and 12 for the chop booth. 24' was chosen for the modeling since only 18% of the styrene is emitted through the chop booth stack).
Exit Gas Velocity:	41 fps
Exit Gas Temperature:	80°F

The results show that the AAAQGs were not exceeded.

	STYRENE	
($\mu g/m^3$)	Predicted	AAAQG
Max. 1-hr	1781	3500
24-hr	712	1700
Annual	142	No listing

- 1-Hr to 24-Hr Concentration: Multiply by 0.4
- 1-Hr to Annual Concentration: Multiply by 0.08

Technical Support Document (TSD)
Permit Number: V97-022
Significant Permit Revision S04-005
March 29, 2006

On April 21, 2003, the USEPA promulgated a National Emissions Standards for Hazardous Air Pollutants (NESHAP) for new and existing reinforced plastic composites production facilities. The NESHAP regulate production and ancillary processes used to manufacture products with thermoset resins and gel coats. Reinforced plastic composites production facilities emit hazardous air pollutants (HAP), such as styrene, methyl ethacrylate (MMA), and methylene chloride (dichloromethane). These HAPs have adverse health effects including headache, fatigue, depression, irritation of skin, eyes, and mucous membranes. Methylene chloride has been classified as a probable human carcinogen. The NESHAP will implement section 112(d) of the Clean Air Act (CAA) by requiring all major sources in this category to meet HAP emissions standards reflecting the application of the maximum achievable control technology (MACT). It is estimated that the final NESHAP will reduce nationwide emissions of HAP from these facilities by approximately 7,682 tons per year (tpy) (43 percent).

The Reinforced Plastic Composites Production source category involves the production of plastic products from cross-linking resins, usually in combination with reinforcing materials and inorganic fillers. These products may have an outer surface produced with a styrene-containing gel coat. The production of products that do not contain reinforcing materials is also included in this category, as well as the production of intermediate compounds that are later used to make the final plastic products. These

non-reinforced products were included because they are produced using the same types of resins, have similar HAP emissions characteristics, and would use similar HAP emissions controls. This source category is limited to those resins and gel coats which contain styrene, either by itself or with a combination of other monomers or solvents. The Marlam facility is classified as a major source for HAPs. Production at the Marlam facility include open molding operations in the tooling area, open molding operations in the production area, the mixing of HAP containing materials, equipment cleaning, storage of HAP-containing material and repair activities. All of these activities are regulated under the NESHAP.

Operations at Marlam include open molding, polymer casting, mixing & cleaning of equipment used in reinforced plastic composite manufacture, HAP containing material storage and repair operations on parts manufactured by Marlam

Marlam has an annual VOC limit of 99 tons per year. On April 21, 2004, the State submitted the One-Hour Ozone Redesignation Request and Maintenance Plan for the Maricopa County Nonattainment Area (assumed to include the Phoenix metropolitan nonattainment area). On March 21, 2005, EPA proposed to approve Arizona's request to redesignate the Phoenix metropolitan 1-hour ozone nonattainment area from nonattainment to attainment (see 70 FR 13425), and gave final approval of the redesignation on June 14, 2005 with an effective date of June 14, 2005 (see 70 FR 34362). The 1-hour standard was then revoked effective June 15, 2005 for all areas in Arizona (see 40 CFR 81.303) and no longer applies.

The Marlam facilty is located in an area that has been designated basic nonattainment for the 8-hour standard (see July 1, 2004 version of 40 CFR 81.303). The "basic" classification indicates that the area meets the current 1-hour ozone standard, but does not meet the 8-hr standard.

MCAPCR Rule 240 §210.1 (5/7/03 version) states that "any stationary source located in a nonattainment area that emits, or has the potential to emit, 100 tons per year or more of any conventional pollutant . . ." is a major source. As a result the facility's VOC emissions will be limited to 99 tons per year by permit condition and will no longer be considered a major source for VOC emissions. The redesignation of the attainment status in combination with the existing VOC limit in effect will designate the facility a synthetic minor for that pollutant. The facility will remain a major source with respect to HAP emissions.

There are no changes physical changes or changes in the method of operation occurring at the facility with this permit revision. The permit is being updated with the applicable requirements of the NESHAP. The NESHAP will require additional monitoring, recordkeeping, reporting, work practice standards and allowable emission limits in the permit. Because this significant permit revision is not considered a facility modification, there is no County Rule 240 or Rule 241 applicability.

The equipment list has been updated. Previously the woodworking equipment was listed generally with no specific information regarding to the type and amount of equipment at the facility. MCAQD required the facility to update the equipment list to include specifically all woodworking equipment that did not meet the requirements to be deemed insignificant. The provided list has been put into the permit. In order for the source to replace or add additional permittable equipment, the appropriate permitting procedures in the MC Rules and Regulations and the State Implementation Plan (SIP) must be met.