

**MESA FULLY FORMED, L.L.C. - COOLIDGE**

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## 1. Introduction

This permit pertains to an operation for the manufacture of cultured marble, plastic laminate products, solid surfaces, engineered and natural stone, which is owned and operated by Mesa Fully Formed, L.L.C., an Arizona Limited Liability. The facility is located at 1349 West Industrial Drive, Coolidge, Arizona, upon parcels also identified by Pinal County Assessor numbers 209-25-01200, -01309, -01408, -01507. The main SIC Codes for the facility are 3087, 3083, and NAICS Codes are 325991, 326130 and 327991 respectively. The facility is situated in an area classified as serious non-attainment for PM10.

The principal operations at the facility are:

- manufacture of cultured marble, custom bath tubs, shower panels and pans and manufacturing of vanity tops;
- manufacture and fabrication of plastic laminated countertops;
- fabrication of solid surfaces, engineered and natural stone.

In the Marble Pour Process Area, molds are sprayed with gelcoat in 4 gelcoat booths. After drying in the drying area, resin and additives, "marble", is poured into the molds from 4 mixer/casting machines. The marble is leveled out and set up in the production area to cure. After curing, the product is removed from the molds and sent to the finishing shop. Gelcoats and resins typically contain styrene and methyl methacrylate (MMA).

In the Finishing Shop, marble products are ground, sanded, polished and buffed as needed. The products are then stored until installation.

In the Core Production/Blank Production/CNC Router shop, boards and plastic laminate are received from a supplier and cut to dimension. They are glued together with an adhesive spray and put through a drying tunnel. After the drying tunnel, a "pinch roller" and a forming machine forms the laminate onto the board. The product is then moved to the Laminate Finishing area where it is cut and finished as needed.

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

The principal emissions from the facility are generated mainly from the gelcoat and resin operations, which emit styrene and MMA, both considered Hazardous Air Pollutants (HAPs) and Volatile Organic Compounds (VOCs). Solvents, thinners and glues are used in several operations around the facility and generate some HAPs and VOCs. Emissions of particulate matter (PM<sub>10</sub>) are generated by the finishing operations.

This facility constitutes a major source of Hazardous Air Pollutants (HAPs) and requires a permit pursuant to Title V of the CAA Amendments of 1990. The facility has to meet the "maximum achievable control technology" ("MACT") standard of CAA §112(g), 40 CFR §63.40 *et seq.*, for its open molding operations. The last revision to this MACT standard (8/25/05) exempted polymer casting and closed molding operations from its requirements. Products produced by the polymer casting process include cultured marble.

The applicant has requested a limitation to keep VOC and HAP emissions below 100 tons per year, to avoid more stringent reductions required by the MACT standard for sources with 100 + tpy of emissions. Also, without this limitation, the source would constitute a "major emitting source" for VOCs within the

meaning of 40 CFR §51.166, and would require the facility to go through a Prevention of Significant Deterioration (PSD) review.

Additional information on this permit, including potential and allowable emissions, can be found in the Technical Support Document (TSD).

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

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

- A. Those specific provisions of the Pinal-Gila Counties Air Quality Control District ("PGAQCD") Regulations, as adopted by the Pinal County Board of Supervisors on March 31, 1975, and approved by the Administrator as elements of the Arizona State Implementation Plan ("SIP") at 43 FR 50531, 50532 (11/15/78), and specifically the following rules:
- |           |  |
|-----------|--|
| 7-3-1.1   | Visible Emissions: General             |
| 7-3-1.2.A | Fugitive Dust                          |
| 1-3-1.8   | Particulate Matter: Process Industries |
- B. Those specific provisions of the Pinal-Gila Counties Air Quality Control District Regulations, as last amended by the Pinal County Board of Supervisors on June 16, 1980, and approved by the Administrator as elements of the Arizona SIP at 47 FR 15579 (4/12/82), specifically, the following rules:
- |         |                            |
|---------|----------------------------|
| 1-3-1.1 | Visible Emissions: General |
|---------|----------------------------|
- C. National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR Part 63, Subpart A [40 CFR §§63.1 - 63.15] and Subpart B [40 CFR §§63.40 - 60.44 (1998)].
- D. National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW [40 CFR §§63.5780-5935].

## 3. Compliance Certification

- A. Compliance Plan [40 CFR §70.(5)(c)(8)](Code §3-1-083A.7)

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

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

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

## 4. Authority to Construct [*Federally enforceable pursuant to PCAQCD Code §§3-1-010, 3-1-040 (10/12/95) approved as a SIP element at 65 FR 79742 (12/20/00)*]

Emissions from this facility, specifically emissions from the equipment described in "Equipment Schedule" section below, and the operating configuration more fully described in the application for permit, already fall subject to the independent Federally Enforceable limitations identified elsewhere in this permit. Therefore, based on the regulations in effect upon the date of issuance of this permit and a finding that allowable emissions from the equipment described in the Equipment Schedule will neither cause nor

contribute to a violation of any ambient air quality standard even without any additional limitations, and a further finding that this does not constitute a "major emitting source" within the meaning of Code §3-3-203, this permit constitutes authority to construct and operate such equipment.

## 5. Emission Limitations and Controls

### A. Applicable Limitations [*Federally enforceable pursuant to PCAQCD Code § 3-1-082 (11/3/93) approved as SIP Elements at 65 FR 79742 (12/20/00)*]

Where different standards or limitations apply under this permit, the most stringent combination shall prevail and be enforceable.

### B. Allowable Emissions [*Federally enforceable pursuant to PCAQCD Code § 3-1-040 (10/12/95) approved as SIP Elements at 65 FR 79742 (12/20/00)*]

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

### C. Synthetic Minor Status - Hazardous Air Pollutants and Volatile Organic Compounds [*Federally Enforceable §3-1-084*] (Code §3-1-081.A)

#### 1. Emission Cap

- a. Permittee shall limit VOC emissions, in any consecutive twelve-month period, to 99 tons.
- b. Permittee shall limit total HAP emissions, in any consecutive twelve-month period, to 99 tons.

#### 2. Throughput Limitations

- a. Permittee shall limit the use of polyester resins (without filler) to not more than 2,500 tons per year.
- b. Permittee shall limit the use of gelcoats to not more than 209 tons per year.
- c. Permittee shall limit the use of other site-wide VOC containing products including mold releasing waxes and mold release sealer to not more than 32 tons per year.

#### 3. Styrene Content Limitations: Permittee shall limit:

- a. The styrene content of the gelcoat to no more than 47% by weight,
- b. The styrene content of the polyester resin in pounds per neat resin weight (without filler) to no more than 32% and
- c. The VOC content of the adhesive used for laminate blank shop production to no more than 0.30 lb/gal.

D. VOC and HAP Emission Controls

1. Gelcoat Delivery System Requirements (Code §3-1-084)

Permittee shall utilize only gel coat delivery systems utilizing "fluid impingement technology" to produce a non-atomized stream, or a High Volume Low Pressure system (HVLP) for an atomized stream.

2. HAPs limitations [*Federally Enforceable 40 CFR §§63.5805 and 63.5810, Code §7-1-040*]

Permittee shall meet the annual organic HAP limits of Table 3 (listed below) of Subpart WWWW, and the work practice standards of Table 4 (listed below).

For meeting the annual organic HAP limits, Permittee shall use one of the following options. Necessary calculations must be completed within 30 days after the end of each month.

- a. Demonstrate that an individual resin or gelcoat, as applied, meets the applicable emission organic HAP emission limit in Table 3. If using this option, Permittee shall follow the procedures in §63.5810.(a).
- b. Demonstrate that, on average, you meet the individual organic HAP emission limits for each combination of operation type and resin application method or gel coat type. If using this option, Permittee shall follow the procedures in §63.5810.(b).
- c. Demonstrate compliance with a weighted average emission limit. If using this option, Permittee shall follow the procedures in §63.5810.(c).
- d. Meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type. If using this option, Permittee shall follow the procedures in §63.5810.(d).

Permittee may switch between the compliance options listed above. If changing to an option based on a 12-month rolling average, Permittee shall base the average on the previous 12 months of data calculated using the compliance option currently being used unless the compliant materials option in paragraph (d) was being used. In this case, Permittee shall immediately begin collecting resin and gelcoat use data and demonstrate compliance 12 months after changing options.

Table 3 to Subpart WWWW of Part 63. Organic HAP Emissions Limit for Existing Open Molding Sources.

If your operation type is...	And you use...	Your organic HAP emissions limit is...
Open Molding - corrosion-resistant and/or high strength (CR/HS)	Mechanical resin application	113 lb/ton
	Manual resin application	123 lb/ton

Open Molding - non-CR/HS	Mechanical resin application	88 lb/ton
	Manual resin application	87 lb/ton
Open Molding - tooling	Mechanical resin application	254 lb/ton
	Manual resin application	157 lb/ton
Open Molding - gel coat	Tooling gel coating	440 lb/ton
	White/off white gel coat	267 lb/ton
	All other pigmented gel coat	377 lb/ton
	CR/HS or high performance gel coat	605 lb/ton
	Fire retardant gel coat	854 lb/ton
	Clear production gel coat	522 lb/ton

3. Work Practice Standards [*Federally Enforceable 40 CFR §§63.5805 and 63.5810, Code §7-1-040*](Code §5-24-1030.D., F)

As listed in Table 4 of 40 CFR 63 Subpart WWWW:

- a. Permittee shall not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
- b. Permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
- c. Permittee shall use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation<sup>1</sup>.
- d. Permittee shall close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety.<sup>1</sup>
- e. Permittee shall keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels<sup>1</sup>.

4. Solvent Cleanup (Code §5-15-620)

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

- a. Permittee shall operate and maintain the solvent cleaning equipment in proper working order and shall not allow any solvent to leak from any portion of the equipment.
- b. All solvent storage, including the storage of waste solvent and waste solvent residues, shall at all times be in closed containers which are legibly labeled with their contents.
- c. 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 disposal/recovery shall be kept in accordance with hazardous waste disposal statutes.
- d. Permittee shall drain cleaned parts for at least 15 seconds after cleaning or until dripping ceases.
- e. Permittee shall not use flushing or cleanup solvents that contain hazardous air pollutants, except to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
- f. Solvents used to flush either the spray gun systems, or the product delivery systems used to deliver styrene, MMA or coating products to the spray gun systems, shall be fed by a hose directly into a covered drum for recycling or disposal.

E. Organic Material Operational Limitations (Code 3-1-083)

1. Labeling

All organic solvents or materials containing organic solvents shall be stored in labeled containers.

F. Particulate Emissions - Opacity Limits

1. SIP Limitation - *[Federally enforceable pursuant to PGAQCD Reg. 7-3-1.1 (8/7/80) approved as a SIP element at 47 FR 15580 (4/12/82)]*

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

2. Visible Limiting Standard *[Federally enforceable pursuant to Code §2-8-300 (5/18/05) approved as a SIP element at 71 FR 15043 (3/27/06)]*

The opacity of any plume or effluent from any point source not subject to a New Source Performance Standard adopted under Chapter 6 of the Code, and not subject to an opacity standard in Chapter 5 of the Code, shall not be greater than 20% as determined in Method 9 in 40 CFR Part 60, Appendix A.

G. Particulate Matter Reasonable Precautions *[Currently federally enforceable pursuant to Code §4-2-040 (6/29/93) approved as a SIP element at 72 FR 41896 (8/1/07) and PGAQD Reg. 7- 3-1.2 approved as a SIP element at 43 FR 53034 (11/15/78)]*



1. Permittee shall not cause, suffer, allow, or permit a building or its appurtenances, subdivision site, driveway, parking area, vacant lot or sales lot, or an urban or suburban open area to be constructed, used, altered, repaired, demolished, cleared, or leveled, or the earth to be moved or excavated, or fill dirt to be deposited, without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.
2. Permittee shall not cause, suffer, allow, or permit a vacant lot, or an urban or suburban open area, to be driven over or used by motor vehicles, such as but not limited to all-terrain vehicles, trucks, cars, cycles, bikes, or buggies, without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.
3. Permittee shall not disturb or remove soil or natural cover from any area without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.
4. Permittee shall not crush, screen, handle or convey materials or cause, suffer, allow or permit material to be stacked, piled or otherwise stored without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.
5. Stacking and reclaiming machinery utilized at storage piles shall be operated at all times with a minimum fall of material and in such a manner, or with the use of spray bars and wetting agents, as to prevent excessive amounts of particulate matter from becoming airborne. Other reasonable precautions shall be taken, as necessary, to effectively prevent fugitive dust from becoming airborne.
6. Permittee shall not cause, suffer, allow or permit transportation of materials likely to give rise to fugitive dust without taking reasonable precautions to prevent fugitive dust from becoming airborne. Earth and other material that is tracked out or transported by trucking and earth moving equipment on paved streets shall be removed by the party or person responsible for such deposits.

H. **Surface Stabilization [Federally enforceable pursuant to Code §4-1-030 (10/28/15) approved as a SIP element at 82 FR 20267 (5/1/17)]**

1. Permittee shall not cause or allow visible fugitive dust emissions from open areas / vacant lots (areas not being utilized for an activity) to exceed 20% opacity based on EPA Method 9 or the continuous plume or intermittent plume methods listed in PCAQCD Code §4-9-340.
2. Permittee shall erect barriers or no trespassing signs upon evidence of trespass on open areas / vacant lots.
3. Permittee shall stabilize any open area / vacant lot greater than 1.0 acre that has 0.5 acre or more of disturbed surface and sign up for the Pinal County Dust Control forecast within 30 days of discovery. The open area / vacant lot shall be stabilized the day leading up to and the day that is forecast to be high risk for dust emissions.
4. Permittee shall not remove vegetation from open areas / vacant lots without applying dust suppressants before and during the weed abatement. Trackout onto paved surfaces must be prevented or eliminated and dust suppressants must be applied following weed abatement to stabilize the entire surface.

5. Stabilization of open areas / vacant lots is determined by the drop ball, threshold friction velocity, flat vegetation or standing vegetation methods listed in PCAQCD Code 4-9-320.
6. Permittee shall not cause or allow visible fugitive dust emissions from unpaved lots (areas being utilized for an activity) greater than 5000 square feet to exceed 20% opacity based on EPA Method 9 or the continuous plume or intermittent plume methods listed in PCAQCD Code §4-9-340.
7. Permittee shall not allow silt loading equal to or greater than 0.33 oz/ft<sup>2</sup> or allow the silt content to exceed 8% on unpaved lots greater than 5000 square feet.
8. Permittee shall stabilize unpaved lots greater than 5000 square feet by paving, applying a dust suppressant or graveling.
9. Permittee shall clean up trackout on a paved public roadway that exceeds 50 feet within 24 hours of discovery and limit opacity to 20% or less while using a rotary brush or broom.
10. Permittee shall make a record of the control measures applied.

I. Process Sources [*Federally enforceable PCAQCD 7-3-1.8*] (Code §5-24-1032)

Permittee shall not cause, suffer, allow or permit the discharge of particulate matter into the atmosphere in any one hour from any process source, in total quantities determined by the following equation:

$$E = 4.10P^{0.67} \text{ where:}$$

E = the maximum allowable particulate matter emissions rate in pounds per hour.

P = the process weight in tons per hour.

J. Spray Booth Overspray [*Federally Enforceable Code §5-13-390*]

Permittee shall conduct spray paint operations in enclosed booths designed to contain no less than ninety-six (96) percent by weight of overspray.

K. Control Requirements (Code §3-1-081)

Finishing operations including grinding and woodworking equipment operations in the marble shop, laminate finish shop, and CNC Router and Thermoformer shop shall be vented through dust collector/baghouses with at least 99% removal efficiency.

L. Gases and Odors (Code §5-24-1030.D)

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

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

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

N. Additional Applicable Limitations

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

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

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

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

**6. Compliance Demonstration**

A. Monitoring Requirements

1. VOCs and HAPs Emissions Recordkeeping and Calculations

- a. Recordkeeping (Code §§3-1-081.A.4, 3-1-083)

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

- i. Resins and Gelcoats: quantity used, organic HAP content, and type of application.
- ii. Other VOC and HAP-containing products: quantity used, VOC content, individual HAP components content and total HAP content. The HAP and VOC content may be based on MSDS information. VOC and HAP-containing products include, but are not limited to: mold releases, mold cleaners, adhesives, promoters and lacquer thinners.

- b. Compliance Calculations (Code §§3-1-081.A.4, 3-1-083)

- i. Within 10 days of the beginning of each month, Permittee shall calculate the previous month's VOC and HAP emissions and the rolling 12 month total emissions.
- ii. In order to prevent VOC emissions greater than the emission cap, if the monthly calculations show that VOC emissions are at 90% or more of the limit, Permittee shall begin calculating emissions on a weekly basis until they are brought down to below 90% of the cap.

- c. Compliance Calculation Method

Permittee shall calculate emissions in the following way:

- i. To determine the VOC and HAP content of VOC- and HAP-containing materials except for resins and gelcoats, Permittee shall use manufacturer supplied data or MSDS information. If a range is given, the maximum content shall be assumed.
- ii. To determine the total styrene emissions from the resins during the casting process, Permittee shall use the following formula:

$$E_C = T_R \times S_C \times S_{EF}$$

where:

$E_C$  = Total styrene emissions from the casting process

$T_R$  = Total resin throughput minus the filler (lbs/month)

$S_C$  = Styrene content of 32%

$S_{EF}$  = Styrene emission factor of 2% from AP-42, Table 4.4-2 and NESHAP Subpart WWWW, Reinforced Plastic Composite Production Background Document

- iii. To determine the HAP (styrene and MMA) emissions from gelcoats, Permittee shall use the following formula:

$$E_G = T_G \times EF_{WWW}$$

where:

$E_G$  = Total HAP emissions from the gelcoat process

$T_G$  = Total gelcoat throughput (lbs/month)

$EF_{WWW}$  = Emission factor as calculated from Table 1 of Subpart WWWW

2. Periodic Monitoring - VOC Storage Inspections (Code §§3-1-081.A.4, 3-1-083)

Permittee shall maintain a log, showing whether each storage container for resin, gel coat or any other VOC-containing products was closed and covered at the end of the production day.

3. Particulate Matter Monitoring and Recordkeeping (Code §§3-1-083, 3-3-260)

a. Stack Opacity

On at least a quarterly basis, Permittee shall conduct a visual opacity screen performed on each process, and shall keep records of these inspections. If visible emissions are observed, Permittee shall have a full Method 9 opacity test performed by a certified opacity observer, and shall provide a copy of the resulting report to the District within 10 days.

b. Open-area Fugitive Emissions

On at least a quarterly basis, Permittee shall conduct a visual opacity screen performed on the open areas of the facility. If visible emission are observed,

Permittee shall have a full Method 9 opacity test performed by a certified opacity observer, and shall provide a copy of the resulting report to the District within 10 days.

c. Records

Permittee shall keep records of the weight of sawdust removed each month from the facility's baghouses.

d. Baghouse Inspections

Permittee shall conduct weekly inspections of the baghouses to confirm they are in good operating condition and to ensure that the dust is being removed from the bins. Permittee shall maintain a log of these inspections, describing any actions that were taken as a result of these inspections.

e. Overspray Control - Filter Inspections

Permittee shall conduct weekly inspections of the spray booth filters to verify that there are no gaps or holes, they are not clogged with particulate matter or in any other way damaged. Permittee shall maintain a log of these inspections, indicating when the filters were changed.

B. MACT Compliance Verification

1. Monitoring and Recordkeeping [*Federally Enforceable 40 CFR §63.5797, Code §7-1-040*]

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 MSDS, or using the procedures described in §§63.5797(a) through (c), as applicable.

2. Required Records [*Federally Enforceable 40 CFR §63.5915, Code §7-1-040*]

Permittee shall keep the following records:

- a. 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.
- b. Permittee shall keep all data, assumptions, and calculations used to determine organic HAP emission factors or average organic HAP contents for all resin and gelcoat application operations.
- c. Permittee shall keep a certified statement that the facility is in compliance with the Work Practice Standards listed in Section 5 of this permit.

3. Initial Compliance Demonstration [*Federally Enforceable 40 CFR §63.5860, 40 CFR 63 Subpart WWWW Table 8, Code §7-1-040*]

Permittee shall show initial compliance with 40 CFR 63 Subpart WWWW by one of the following:

- a. Meeting the appropriate organic HAP emission limits for these operations as calculated using the procedures in §63.5810 on a 12-month rolling average 1 year from the issuance of this permit, and/or
- b. Demonstrating that any individual resins or gelcoats not included in a. above, as applied, meet their applicable emission limits, or
- c. Demonstrating using the appropriate values in Table 7 of 40 CFR Subpart WWW that the weighted average of all resins and gel coats for each resin type and application method meet the appropriate organic HAP contents.

4. Continuous Compliance [*Federally Enforceable 40 CFR §63.5900, Code §7-1-040*]

Permittee shall demonstrate continuous compliance with each standard that applies to this facility using the following methods:

- a. Compliance with organic HAP emissions limits is demonstrated by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limits listed in Table 3 or 7 of WWW, 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.
- b. Compliance with the Work Practice Standards of this permit (Table 4 of WWW) is demonstrated by performing the work practice required for the operation.
- c. Permittee shall report each deviation from each permit condition that is applicable. Deviations shall be reported according to the requirements of 40 CFR §63.5910.

5. Calculations [*Federally Enforceable 40 CFR §63.5810, Code §7-1-040*]

- a. Within 30 days after the end of each month, Permittee shall complete calculations verifying compliance with the MACT standards for open molding. Calculations shall be done in accordance with 40 CFR §63.5810.
- b. Within 10 days of the beginning of each month, Permittee shall complete calculations as specified in Section §6.A.1.b of this permit to verify compliance with the emission cap listed in Section §5.C.1 of this permit. These calculations shall be submitted with the semi-annual reports and the annual emission inventory form.

C. Recordkeeping [*Federally Enforceable 40 CFR §70.6(a)(3), 40 CFR 63 Subpart WWW*][*Code §7-1-040*]

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

- 1. Maintain at the source a record of all measurements, including continuous monitoring-system-, monitoring-device-, and performance- testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required pursuant to any federally enforceable provision of this permit, recorded in a permanent form suitable for

inspection. The file shall be retained for at least five years following the date of such measurements, maintenance, reports and records.

2. Maintain records of the occurrence and duration of any start-up, shutdown or malfunction in the operation of the permitted facility or any air pollution control equipment.
3. Maintain all data, assumptions, and calculations used to determine organic HAP emission factors or average organic HAP contents.
4. Keep a certified statement that they are in compliance with the work practice standards in Table 4 of Subpart WWW of 40 CFR 63.

D. Regular Compliance Reporting [*Federally Enforceable 40 CFR §§70.6(a)(3), 70.6(c)(4)[40 CFR §63.5910(c)]*]

In order to demonstrate compliance with the provisions of this permit, Permittee shall submit a report to the District within 30 days of the end of each calendar half containing the following information. Appendix A of this permit is a form which may be used for this report.

1. Company name and address.
2. Statement by a responsible official with the 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 and there are no deviations from the requirements for work practice standards, a statement to that effect.
5. For each deviation, information on the number of deviations, duration and cause of deviations as applicable, and the corrective action taken.
6. If Permittee has exceeded the 100 tpy organic HAP emission threshold.
7. Volume of each resin, gel coat, paint, adhesive, and solvent used during the period, including organic HAP content of each resin and gel coat, and
8. Total semi-annual emissions of VOC and HAPs emitted during the period.
9. Compliance status of record keeping requirements.
10. Statement indicating whether the compliance option has changed since the last compliance report.
11. Certified statements indicating the following regarding initial compliance with work practice standards:
  - 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 mixer covers 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;
  - d. that mixers are closed except when adding materials to the mixing vessels.
- E. Notification of Compliance Status [*Federally Enforceable 40 CFR §63.5905(a), §63.9(h), §63.5860(a)*]
- 1. Permittee shall submit to the Control Officer and to the Administrator 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:
    - a. The methods that were used to determine compliance;
    - b. The results of any performance tests, opacity or visible emission observations; and/or other monitoring procedures or methods that were conducted;
    - c. The methods that will be used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods;
    - d. The type and quantity of HAPs emitted by the source, reported in units and averaging times and in accordance with the test methods specified in the relevant standard;
    - e. An analysis demonstrating whether the source is a major source, using the data generated for this notification;
    - f. A description of the pollution control equipment or method for each emission point, including each control device or method for each HAP and the control efficiency (percent) for each control device or method; and
    - g. A statement by the Permittee as to whether the source has complied with the relevant standard or other requirements.
    - h. That all cleaning materials, except styrene contained in closed systems, or materials used to clean cured resin from application equipment contain no HAP.
    - i. 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.
    - j. that the mixers are not actively vented to the atmosphere when the agitator is turning, except when adding materials or as necessary for safety.
    - k. That all mixer covers 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.
    - l. That the mixers are closed except when adding materials to the mixing vessels.



- m. That the facility has commenced collecting all necessary data to show compliance with these permit conditions.
2. If using the organic HAP emissions limit averaging option to comply with the standard, the notification of compliance status requirements shall be submitted no later than 1 year plus 30 days after the facility's compliance date.
3. If 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 must be submitted no later than 30 days after the facility's compliance date.
4. If Permittee changes any information submitted in any notification, the Permittee shall submit changes in writing to the Administrator and the Control Officer within 14 days after the change.

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

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

1. Be signed by a responsible official, namely the president, secretary, treasurer, vice-president of the corporation, the director of manufacturing, or such other person as may be approved by the Control Officer as an administrative amendment to this permit;
2. Identify each term or condition of the permit that is the basis of the certification;
3. Verify the compliance status with respect to each such term or condition;
4. Verify whether compliance with respect to each such term or condition has been continuous or intermittent;
5. Identify the permit provision, or other, compliance mechanism upon which the certification is based; and
6. Be postmarked within thirty (30) days of the start of each calendar year.

**7. Other Reporting Obligations**

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

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

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

Permittee shall complete and submit to the District an annual emissions inventory, disclosing actual emissions for the preceding calendar year. The inventory shall reflect actual emissions of all pollutants regulated under this permit. The submittal shall be made on a form provided by the

District. The inventory is due by the latter of March 31, or ninety (90) days after the form is furnished by the District.

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

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

**9. General Conditions**

**A. Term (Code §3-1-089)**

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

**B. Basic Obligation (Code §3-1-081.)**

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

**C. Duty to Supplement Application (Code §§3-1-050.H, 3-1-081.A.8.e, 3-1-110)**

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

**D. Right to Enter (Code § 3-1-132, 8-1-050)**

Authorized representatives of the District shall, upon presentation of proper credentials, be allowed:

1. to enter upon the premises where the source is located or in which any records are required to be kept under the terms and conditions of this permit;
2. to inspect any equipment, operation, or method required in this permit; and
3. to sample emissions from the source.

E. Transfer of Ownership (Code §3-1-090)

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

F. Posting of Permit (Code §3-1-100)

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

G. Permit Revocation for Cause (Code §3-1-140)

The Director of the District ("Director") may issue a notice of intent to revoke this permit for cause pursuant to Code §3-1-140, which cause shall include occurrence of any of the following:

1. The Director has reasonable cause to believe that the permit was obtained by fraud or material misrepresentation;
2. Permittee failed to disclose a material fact required by the permit application form or a regulation applicable to the permit;
3. The terms and conditions of the permit have been or are being violated.

H. Certification of Truth, Accuracy, and Completeness (Code §3-1-175)

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

I. Renewal of Permit (Code §3-1-089)

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

J. Severability (Code §3-1-081.A.7)

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

K. Permit Shield (Code § 3-1-102.)

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

1. Items listed in Section 10 of this permit as not being federally enforceable.

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

1. This permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
2. The permittee shall furnish to the Control Officer, within a reasonable time, any information that the Control officer may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating the permit or to determine compliance with the permit.
3. Permit amendments, permit revisions, and changes made without a permit revision shall conform to the requirements in Article 2, Chapter 3, of the Code.
4. Revision to Obtain Authority to Reconstruct [40 CFR 63.42(c)] Code §3-1-040.D.

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

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

- a. The fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable process or production unit; and
- b. It is technically and economically feasible for the reconstructed major source to meet the applicable maximum achievable control technology emission limitation for new sources established under 40 CFR Part 63, Subpart B.

M. Permit Re-opening (Code §3-1-087.)

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

- b. The Control Officer determines that it contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of it;
  - c. The Control Officer determines that it needs to be revised or revoked to assure compliance with the applicable requirements; or
  - d. The EPA Administrator finds that cause exists to terminate, modify, or revoke and reissue this permit.
2. If this permit must be reopened or revised, the District will notify the permittee in accord with Code §3-1-087.A.3.
- N. Record Retention (Code §3-1-083.A.2.b)
- Permittee shall retain for a period of five (5) years all documents required under this permit, including reports, monitoring data, support information, calibration and maintenance records, and all original recordings or physical records of required continuous monitoring instrumentation.
- O. Scope of License Conferred (Code §3-1-081.)
- This permit does not convey any property rights of any sort, or any exclusive privilege.
- P. Excess Emission Reports; Emergency Provision (Code §3-1-081.E, Code §8-1-030)
1. To the extent Permittee may wish to offer a showing in mitigation of any potential penalty, underlying upset events resulting in excess emissions shall reported as follows:
    - a. The permittee shall report to the Control Officer any emissions in excess of the limits established by this permit. Such report shall be in two parts:
      - i. Notifications by telephone or facsimile within 24 hours or the next business day, whichever is later, of the time when the owner or operator first learned of the occurrence of excess emissions, including all available information required under subparagraph b. below.
      - ii. Detailed written notification within 3 working days of the initial occurrence containing the information required under subparagraph b. below.
    - b. The excess emissions report shall contain the following information:
      - i. The identity of each stack or other emission point where the excess emissions occurred.
      - ii. The magnitude of the excess emissions expressed in the units of the applicable limitation.
      - iii. The time and duration or expected duration of the excess emissions.
      - iv. The identity of the equipment from which the excess emissions occurred.

- v. The nature and cause of such emissions.
  - vi. If the excess emissions were the result of a malfunction, steps taken to remedy the malfunction and the steps taken or planned to prevent the recurrence of such malfunctions.
  - vii. The steps that were or are being taken to limit the excess emissions. To the extent this permit defines procedures governing operations during periods of start-up or malfunction, the report shall contain a list of steps taken to comply with this permit.
  - viii. To the extent excess emissions are continuous or recurring, the initial notification shall include an estimate of the time the excess emissions will continue. Continued excess emissions beyond the estimated date will require an additional notification.
2. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
  3. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of the following subparagraph are met.
  4. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
    - a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
    - b. The permitted facility was at the time being properly operated;
    - c. During the period of emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
    - d. The permittee submitted notice of the emergency to the Control Officer by certified mail or hand delivery within 2 working days of the time when emissions limitations were exceeded due to emergency. The notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective action taken.

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

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

- A. Section 1. Introduction

## B. Section 9.F Posting of Permit

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

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

	<b>Name</b>	<b>Quantity</b>	<b>Size/Capacity</b>	<b>Type</b>
<b>CULTURED MARBLE AREA</b>				
1	Pour Shop Spray Booth	4	15,350 cfm	3 walled, 10 x 14 ft
2	Gelcoat Spray System	4	FIP	FIP
3	Pour Shop Casting Machine	1	40-80 lb/min	
4	Panel Shop Casting Machine	1	15 kg/min	
5	Panel Shop Auto Caster	1		Closed chamber
6	Belt Sander	1	3-5 HP	Bench
7	AirWall Air Cleaner	2	23.5 HP	
8	Sander (Time Saver)	1	8.5 HP	
9	Dust Collector	1	9,000 cfm	Baghouse
10	Dust Collector (Portable)	1	1 HP	For sander
<b>SOLID SURFACE SHOP</b>				
11	Shaper	1		
12	Chop Saw	3	1.5 HP	
13	Panel Saw	2		
14	Thermal Form Oven	1		
15	Dust Collector	1	3,900 cfm	
<b>LAMINATE BLANK SHOP</b>				
16	Saws	3	5-15 HP	
17	Core Machine	1	20 HP	
18	Glue Spray Booth	1	5 HP	5 x 6 ft, enclosed
19	Drying Tunnel 1	3		
20	Pinch Roller	1	80 psi	
21	Index Table	1		

22	Post Forming Machine	1	4 HP	
23	Cove Machine	1	8 HP	
24	Dust Collector	2	3,900 cfm	
<b>LAMINATE FINISH SHOP</b>				
25	Panel Saws	3	15 HP	
26	Dust Collector	2	2,400 CFM	
27	Overhead Router	1	5 HP	
28	V-Groover	1	10 HP	
29	Spray Adhesive Guns	1	HVLP	Air assisted
30	Table Saws	3	5 HP	



Appendix A

**Semi-annual Report**

**Permit V20698.000**

**Abstract**

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

**Reporting Period** - January-June \_\_\_ Or July-December \_\_\_ Year\_\_\_\_\_

**Facility** - Mesa Fully Formed, L.L.C.  
1349 West Industrial Drive, Coolidge, AZ

**Material and Emissions Report**

On a separate sheet, please indicate the volume of each VOC- and/or HAP-containing material used, including the styrene content of resins and gelcoats, and the VOC content of the mold releases and adhesive.

On that same sheet or a separate sheet, show the VOC and HAP emissions emitted during the reporting period.

Has Permittee exceeded the 99 tpy VOC limit? Yes\_\_\_\_\_ No\_\_\_\_\_

Has Permittee exceeded the 99 tpy HAP limit? Yes\_\_\_\_\_ No\_\_\_\_\_

**Usage Report**

Amount of resin used during the reporting period - \_\_\_\_\_ tons

Amount of gelcoat used during the reporting period - \_\_\_\_\_ tons

Amount of site-wide VOCs (non-styrene) products used during the reporting period - \_\_\_\_\_ tons

**MACT Compliance**

Has the compliance option changed since the last compliance report? Yes\_\_\_\_\_ No\_\_\_\_\_

**Work Practice Standards**

Did any of the cleaning materials, except styrene contained in closed systems, or materials used to clean cured resin from application equipment, contain any HAP? Yes\_\_\_\_\_ No\_\_\_\_\_

Were all HAP-containing storage containers kept closed or covered except when adding or removing materials? Yes\_\_\_\_\_ No\_\_\_\_\_

Were mixer covers closed during mixing except when adding materials to the mixers, and gaps around mixer shafts and required instrumentation were less than 1 inch? Yes\_\_\_\_\_ No\_\_\_\_\_

Were mixers closed except when adding materials to the mixing vessels? Yes\_\_\_\_\_ No\_\_\_\_\_

**Other Compliance Issues**

Has Permittee:

○ Performed the compliance calculations according to the Section §6.A.1.b of this permit? Yes \_\_\_\_\_ No \_\_\_\_\_

If YES, are the calculations attached with this report? Yes \_\_\_\_\_ No \_\_\_\_\_

○ Maintained a log of VOC storage inspections, as required by §6.A.2? Yes \_\_\_\_\_ No \_\_\_\_\_

○ Performed the opacity screenings required under §6.A.3? Yes \_\_\_\_\_ No \_\_\_\_\_

○ Maintained a log of baghouse inspections and filter inspections, as required by §6.A.3?.....

○ Has Permittee kept records of the weight of sawdust removed each month from the facility’s baghouses?  
Yes \_\_\_\_\_ No \_\_\_\_\_

○ On a separate sheet, describe and explain any monitoring activity or recordkeeping that occurred with respect to the Asbestos NESHAP or Stratospheric Ozone requirements respectively defined in §§5.G.1 and 5.G.2 of the permit during the reporting period.

Is such a supplemental disclosure attached? Yes \_\_\_\_\_ No \_\_\_\_\_

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

**Certification by Responsible Official**

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

Signed \_\_\_\_\_

Printed Name \_\_\_\_\_

Title \_\_\_\_\_

Contact Phone Number \_\_\_\_\_

Date \_\_\_\_\_

Email to: compliancereports@pinal.gov, or

Mail to: Pinal County Air Quality Control District  
P.O. Box 987  
Florence, AZ 85132