

HEXCEL CORPORATION - CASA GRANDE

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1. Introduction

This permit revision pertains to an existing structural honeycomb manufacturing facility operated by Hexcel Corporation, a Delaware corporation. The SIC Codes are 2679 and 3469. The facility is located at 1214 West Gila Bend Highway, Casa Grande, Arizona upon parcels also identified by Pinal County Assessor's Parcel # 503-46-020C, 503-46-020D, 503-46-021-D, and 503-46-047. The source is situated in an area classified as "nonattainment" for PM10 and "attainment" for all other pollutants.

This revision clarifies the timeline for routing the existing Acoustic-Cap Dip/Blot machine enclosure vent pipe to a RTO and for routing the secondary enclosures in the existing mix rooms along with redesigned mix tanks to a RTO.

Section 12 of this permit recites a list of emission-generating equipment covered under this permit.

Emissions consist principally of volatile organic compounds ("VOCs"), hazardous air pollutants ("HAPs"), and typical products-of-combustion.

The plant principally manufactures "honeycomb" and "structural cores" for aerospace and other industrial applications. The honeycomb material is typically used as a structural web, bonded between sheets to form a stiff, strong and light-weight structural panel. Honeycomb-type structures also have beneficial energy-absorbing characteristics and are used as impact absorbers on commercial aircraft as well as roadway maintenance trucks and other vehicles.

Hexcel manufactures both metallic and nonmetallic cores. Metallic foil surfaces undergo preliminary chemical cleaning and treatment to assure good adhesive bonding. Whatever the substrate, selectively applied adhesives bond successive layers of material together in a "sandwich." Mechanical fingers then expand the bonded sandwich to form the cellular core structure. Strong and reproducible bonding, using proprietary high-strength adhesives, provides high core strength and mechanical integrity. Thermally cured resin coatings stiffen the nonmetallic cores. Mechanical equipment cuts and slices the expanded cores to define final structural shapes.

The resin coating and curing processes constitute the primary sources of emissions from the facility. Most of the atmospheric emission streams from the honeycomb manufacturing process contain VOCs and HAPs. Other constituents emitted to the atmosphere consist of criteria pollutants from the combustion of natural gas, acid fumes from certain pre-printing process lines, and particulate matter from the core-shaping process areas.

The resin coating process involves large quantities of organic solvents which must be handled in an explosion-proof facility. Some of the solvent which evaporates during the dipping process and handling of "wet" blocks" is emitted inside the dip room where a small portion is lost to the atmosphere. However, the bulk of emissions from the dipping, purging and the curing process is collected and transported to oxidizers which substantially reduce emissions. Other VOC- and HAP-generating processes throughout the plant have differing degrees of capture and/or control.

Liquid/solid wastes from the various solvents used for cleaning as well as residual solvent-based mixtures are disposed of as hazardous waste and handled by EPA authorized disposal facilities. The particulates from cutting non-metallic core are captured and disposed as solid waste. The chips and scraps from cutting metallic core are captured and sold on the metal recycling market.

Since the source constitutes a "major emitting source" within the meaning of CAA §169(1), and "major source" for volatile organic compounds within the meaning of CAA §302(j), the facility requires an operating permit under CAA §501 *et seq.*

PERMIT HISTORY

- 1) Renewal V20661.000 incorporated the management practices and reporting obligations required by NESHAP Subpart WWWW in relation to two processes involving chromium solutions.
- 2) V20639.R05, authorized several changes. Hexcel is planning to expand the operation at the Casa Grande Facility. The approved project includes the construction of new buildings, construction of a new dip area, separation of the dip, purge, and cure operations into three distinct process steps relative to the current combined setup, elimination of VOC laden air as a source of makeup air to the ovens, and adding support equipment for the new and/or modified ovens. In an effort to improve employee safety as well as reduce emissions from the Casa Grande Facility, the project includes a new process design to minimize emissions by upgrading the VOC emission control measures on new and existing equipment. While these changes did represent an increase in potential emissions, the increase was below the Significant Emission Rate. The proposed changes do not trigger PSD, even considering increases in Greenhouse Gases. Furthermore, Hexcel did not request an increase to their current 300 tpy VOC emissions cap. A review of past revisions, back to the issuance of the original PSD permit in 2009, found three potentially related revisions, V20639.R03, V20639.R04 and V20639.R05. These revisions were reviewed for aggregation. Hexcel submitted information demonstrating the three revisions were economically and technically independent

The revision authorized the addition of several pieces of equipment and removed a diesel-fired emergency generator and a diesel-fired emergency air compressor. The revision also lowered the calculated potential emissions from RTO #2, #3 and #4 by changing the reported design heat input. Research determined that a mathematical error in historical applications lead to the incorrect capacities. A facility wide NO_x cap and associated recordkeeping were added to the permit. Additional recordkeeping, monitoring and testing were included in association with the redesigned process. The Technical Support Document for this revision provides of summary of the equipment changes.

- 3) V20639.R04, authorized several minor changes. While these changes did represent an increase in emissions, the increase was below the Significant Emission Rate. The proposed changes did not trigger PSD, even considering increases in Greenhouse Gases. Furthermore, Hexcel did not request an increase to their current 300 tpy VOC emissions cap.

A review of past revisions, back to the issuance of the original PSD permit in 2009, found two potentially related revisions, V20639.R03 and V20639.R04. These revisions were reviewed for aggregation. Hexcel submitted information demonstrating the two revisions were economically and technically independent. Authorized emissions increases from both revisions were also combined and found to be below the Significant Emission Rates. Additional information on this analysis is included in the Technical Support Document for this revision.

None of the changes sought with this revision triggered any additional requirements, or changes in monitoring or recordkeeping, since all the changes were subject to the same requirements as existing units. Therefore the changes were primarily reflected in the Equipment List in Section 12. A summary of the changes and explanation of the emissions increases and decreases were included in the Technical Support Document for this revision.

- 4) Permit revision V20639.R03 authorized several minor changes. While these changes did represent an increase in emissions, the increase was below the Significant Emission Rate. The changes did not trigger PSD, even considering increases in Greenhouse Gases. Furthermore, Hexcel did not request an increase to their current 300 tpy VOC emissions cap.

None of the changes sought with this revision triggered any additional requirements, or changes in monitoring or recordkeeping, since all the changes were subject to the same requirements as existing units. Therefore the changes are reflected in the Equipment List in Section 12 only. A summary of the changes and explanation of the emissions increases and decreases were included in the Technical Support Document for this revision.

- 5) Permit revision V20639.A02 was an administrative amendment to correct naming nomenclature in the equipment list. Equipment ID 490 was changed from Block Oven Carts (4) to Four-Block Oven Cart (1).
- 6) Permit revision V20639.R01 authorized the installation and operation of a soil vapor extraction unit (SVE) to clean up a methyl ethyl ketone (MEK) spill discovered in 2010. The equipment used to remediate the spill was a “Compact-THERM” thermal/catalytic oxidation system. The thermal system operates in thermal mode at high MEK concentrations (approximately 14,000 ppmV) and is switched to catalytic mode during low concentrations (below 2,000 ppmV). The manufacturer of the system indicates that the lowest destruction efficiency is 99% during thermal mode and 98% during catalytic mode. Controlled potential VOC emissions have been estimated at 25.9 lb/day or 2.35 tons per year (based on 6 months of operation).
- 7) Renewal V20639.000 addresses the following administrative changes:
- Replacement of 2 MMBtu oven #460C by another natural gas oven, rated at 4 MMBtu. The emissions increase for NO_x and CO will be less than 1 tpy.
- 8) Permit revision V20602.R07 authorizes the addition of 3 additional double capacity purge/cure ovens (#26, #27, #28), a set of Four-Block oven carts, one additional R169 dip tank (R169 Dip Tank #2), a replacement for F660 dip tank, a replacement for F124 dip tank, an additional Acousti-Cap Dip/Blot machine and removal of MACT JJJJ requirements. Hexcel will also be controlling the CCC Machine #1 and #2 emissions by routing them to an existing RTO. The proposed emissions increase from this revision will be 61.29 tons per year of VOC, which exceeds the 40 tpy PSD significance threshold. Looking at the 5-year look-back of emissions increases and decreases, the net emissions increase is less than 100 tpy.

This revision is a major modification, and since Hexcel is an existing PSD major source, the facility is subject to PSD review for VOC emissions, and therefore has to apply Best Available Control Technology (BACT). The corresponding Technical Support Document for this revision includes all the information pertaining PSD review, as well as explanation on other changes made to this permit during this revision.

- 9) Permit revision V20602.R06 authorizes the addition of double oven #25, an indirect-fired natural gas oven. The addition of oven #25 increases potential VOC emissions by 17 tpy.
- 10) Permit revision V20602.R05 authorizes the replacement of RTO #1 with a new oxidizer system. The oxidizer system capacity will be larger than the previous one, and in addition to controlling the same Purge/Cure oven emissions as the current RTO #1, Permittee will also be capturing

emissions within the Dip Room that in the past went uncontrolled, and venting them to the new RTO. These previously uncontrolled emissions are:

- Emissions from dip room vents (411-1 through, 411-5).
In the past, when there was no demand for make-up air for the purge/cure ovens, pressure relief louvers would vent the air that was captured from within the dip room to the atmosphere. Permittee will also capture these low-level, high volume VOC emissions from the pressure relief louvers and vent them to the new RTO.
- Dip Room Blow Out Rack (stack #417)

The new oxidizer will be made up of two units of 50,000 cfm each (RTO #3 and RTO #4). These units will be installed in phases to ensure there's adequate emissions control at all times during the transition. The addition of this new RTO system and the additional capture of emission points previously vented to the atmosphere represent a decrease in VOC emissions of 39 tpy.

As part of this revision, Permittee will also be conducting the following changes: 1) the replacement of the PAA oven by a 3 MMBtu/hr oven, 2) the replacement of the fans for Purge/Cure ovens 17-21, with larger capacity fans, to decrease the length of the cycle and therefore increasing the number of cycles that can occur in a given amount of time, and 3) the addition of double oven #24, an indirect-fired natural gas oven. No additional VOCs will be emitted from the replacement of the PAA oven. The fan upgrades in ovens 17-21 represent an increase of 4.36 tpy (or 0.87 tpy per oven) in potential VOC emissions, and the addition of oven #24 increases potential emissions by 17 tpy.

This revision also approves an administrative change regarding the deviation reporting of the RTOs. The permit currently requires permittee to report any shutdown of the RTO as a deviation of the permit. Since Permittee does conduct planned shutdowns for required maintenance and repair, they've been reporting deviations in accordance to the permit, even though the operations routed to such RTO are also shutdown, or bypassed to another RTO during these maintenance and repairs. This revision revises the language in the permit to require reporting only on deviations of the temperatures or pressure drops that occur when the oxidizer is operating and controlling emissions.

Due to the changes approved by this revision, there will be an emissions increase of 26.20 tpy of NOx due to the larger capacity of RTOs #3 and #4, the PAA oven replacement, and new oven #24.

- 11) Permit revision V20602.R04 re-authorizes the installation of oven #23 previously approved by revision V20602.R03. Such oven has not been installed yet, and Permittee would like to install it as a "double" oven. This change does not trigger any additional requirements. Also, as part of this revision, the language from Code §3-1-082, which was previously missing, was added to the permit.
- 12) Permit revision V20602.R03 authorized the installation of the "Septum Core" process and Purge/Cure Ovens #22 and #23. While the original Title V permit for this facility (V20602.000) authorized the installation of oven #22 (see §12.B of such permit), Permittee has re-submitted the oven's information with revision R03 emissions and an applicability analysis for the installation of the oven.

The Septum Core process will be used to produce a new type of honeycomb core with pieces of material, or septa, inserted and adhered into each honeycomb cell. The process will involve the addition of a Septum Core Machine, 2 Septum Insertion Machines and a Septum Adhesive Cure Machine. This process will emit Volatile Organic Compounds and Hazardous Air Pollutants due to the application and curing of adhesive. This process is subject to the requirements of 40 CFR 63 Subpart JJJJ¹ and therefore emissions will be controlled using enclosures around the process and venting emissions to the oxidizer.

The 2 new ovens will be hot oil heated by existing hot oil heaters. As with the existing purge/cure ovens, VOC-rich portions of the oven cycle will be controlled by a thermal oxidizer and the portions of the cycle with less VOCs will be vented directly to the atmosphere.

- 13) Permit revision (V20602.R02) reopens the permit to include the applicable requirements of the MACT standard for Paper and Other Web Coating (Subpart JJJJ). Permittee has requested an extension on the compliance date for this standard, since to be able to comply they are installing permanent enclosures around some of their processes. This permit revision is issued with a compliance plan and a compliance schedule in accordance with §63.6(i)(4)(i).

To demonstrate compliance with the requirements of subpart JJJJ, Hexcel intends to use a combination of add-on controls and the use of low-HAP materials. Coating use data will be averaged across all lines, and control efficiencies will be factored in where appropriate in the compliance demonstration. Permanent Total Enclosures (PTE's) will be installed around three of the affected processes to achieve compliance with JJJJ. The VOC emissions increase associated with this change is less than the 40 tons significance level, and does not trigger PSD.

- 14) Permit revision (V20602.R01) removes the MACT standard for Surface Coating of Miscellaneous Parts (Subpart MMMM) from the permit. The original permit allowed the Permittee until 1/5/05 to submit an applicability notification. On 1/5/05, PCAQCD received notification that such standard was not applicable, and in accordance with section 6.C.3 (no longer an existing section of this permit), Hexcel has submitted a permit revision to remove the standard from their permit. Also, since the issuance of the original permit, the MACT standard for Industrial, Commercial, and Institutional Boilers and Process Heaters (Subpart DDDDD) has been promulgated. Revision 'R01 incorporates the standard into the permit. A very brief summary of the changes processed through revision V20602.R01 can be found in the corresponding Technical Support Document (TSD).

2. Listing of (*Federally Enforceable*) Applicable Requirements [Mandated by 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:

7-1-1.2	Definitions
7-3-1.1	Emission Standards - Particulates - Visible Emissions - General
7-3-1.2	Emission Standards - Particulate Emissions - Fugitive Dust
7-3-1.3	Emission Standards - Particulates - Open Burning

¹

See TSD for permit revision V20602.R03 for discussion on Subpart JJJJ applicability.

7-3-1.7.A	Particulate Emissions - Fuel Burning Equipment
7-3-1.7.B	Particulate Emissions - Fuel Burning Equipment
7-3-1.7.C	Particulate Emissions - Fuel Burning Equipment
7-3-1.7.D	Particulate Emissions - Fuel Burning Equipment
7-3-1.7.E	Particulate Emissions - Fuel Burning Equipment
7-3-1.8	Particulate Emissions - Process Industries
7-3-4.1	CO Emissions - Industrial
7-3-5.1	NOx Emissions - Fuel Burning Equipment

- B. Those specific provisions of the Pinal-Gila Counties Air Quality Control District Regulations, as last amended by the Pinal County Board of Supervisors on June 16, 1980, and approved by the Administrator as elements of the Arizona SIP at 47 FR 15579 (4/12/82), specifically, the following rules:

7-3-1.1	Visible Emissions; General
7-3-1.7.F	Fuel Burning Equipment

- C. The New Source Performance Standard ("NSPS") for Polymeric Coatings of Supporting Substrates, 40 CFR Part 60, Subpart VVV [40 CFR §60.744(b) (2000)] sections 40.747(c)(1) through (c)(3). If the amount of VOC used is 95 Mg or greater per 12-month period, the facility is subject to all the requirements of the subpart. Once a facility has become subject to the requirements of the subpart, it will remain subject to those requirements regardless of changes in annual VOC use.
- D. The New Source Performance Standard ("NSPS") for Volatile Organic Liquid Storage Vessels, 40 CFR Part 60, Subpart Kb [40 CFR §60.116b(b) (2000)].
- E. CAA §§608 & 611 (11/15/90); 40 CFR Part 82, Subpart F - Recycling and Emissions Reduction (9/7/95); regulations pertaining to use and handling of ozone-depleting substances.
- F. PCAQCD permit A20422.000 (1/18/94), imposing certain limits on opacity, baghouse operation, and material labeling.
- G. The National Emission Standard for Hazardous Air Pollutants ("MACT") for Aerospace Manufacturing and Rework Facilities, 40 CFR Part 63, Subpart GG [40 CFR §63.740 *et seq.* (1995)]
- H. The National Emission Standard for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations, 40 CFR Part 63, Subpart WWWW [40 CFR §63.11504 *et seq.*]
- H. The National Emission Standard for Hazardous Air Pollutants ("MACT") - General Provisions [40 CFR §63.1 *et seq.*]
- I. The New Source Performance Standards ("NSPS") - General Provisions [40 CFR §60.1 *et seq.*]

3. Compliance Certification

- A. Compliance Plan
[Mandated by 40 CFR §70.(5)(c)(8)] (Code §§3-1-081.C, 3-1-083.A.7)

Since the Permittee has certified that it is currently in compliance, the compliance plan consists of continued adherence to the requirements of this permit.

- B. Compliance Schedule
[Mandated by 40 CFR §§ 70.5(c)(8), 70.6(c)(3)] [40 CFR 63.6(i)(6)(B)] (Code §§3-1-060.B.1, 3-1-083.A.7.c)

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

4. Authority to Construct; Major- and Minor-NSR Permit-Based Limitations

- A. Generally

This permit section sets forth "applicable requirements" founded upon the federally enforceable provisions of current and prior "permits to construct." Other than as defined in this section, emission units at this facility are "grandfathered," and are not subject to limitations arising only from limitations defined in prior permits. Nonetheless, all emission units do fall subject to relevant Regulatory Emission Limitations, as defined elsewhere in this permit.

- B. Permit-based Minor NSR Limitations
[Federally enforceable provision, pursuant to Code §3-1-084 (8/11/94)] (Code §3-1-081.A)

1. Emissions Cap - VOCs

- a. Best Available Control Technology (BACT)
[Mandated by 40 CFR §70.6(a)(1)] (Code §3-3-250)

Emissions from the following equipment shall be controlled by an RTO system, with a minimum destruction efficiency of 95%:

- Purge/Cure Ovens #19, 20 and 21.

2. Purge/Cure Ovens #22 and #23

- a. Level of Control

Emissions from ovens #22 and #23 installed under permit revision V20602.R04 (5/24/07) shall be reduced by control in an RTO system, with a minimum destruction efficiency of 95%.

- b. Required Capture Efficiency

Emissions from these emission points shall be subject to at least the 75% capture requirement determined per testing conducted in 2006.

3. Septum Core Process

- a. Level of Control

VOC emissions from the Septum Core Machine and the Septum Cure Adhesive Machine installed under permit revision V20602.R04 (5/24/07) shall be reduced with a net control efficiency of 90%, and that control efficiency shall reflect the combination of capture efficiency and destruction efficiency of the RTO systems.

C. V20602.R05 New Equipment Minor NSR Limitations
[Federally enforceable provision, pursuant to Code §3-1-084(8/11/94)] (Code §3-1-081.A)

1. Emissions Cap - VOCs

a. Emission Cap

Permittee shall limit VOC emissions from the new Purge/Cure Oven # 24, Fan upgrades to Ovens #19 through #21, PAA Oven replacement and Oxidizer #1 replacement authorized by revision V20600.R05, in any twelve-month period, to 24 tons.

b. Operational Limits and Controls

To stay within the preceding emission cap for VOC emissions, and thereby also avoid triggering PSD review, Permittee shall:

- i. Replace RTO #1 with an RTO system with 2 units rated each at 50,000 cfm at least, in order to provide additional VOC control capacity and redundancy to the system.
 - A. Each RTO unit shall be equipped with a thermocouple or RTD to measure the temperature in the combustion zone and a differential pressure flow device or fan motor ammeter to measure the gas velocity or flow rate.
- ii. Install a capture system for the emissions from the dip room Blow Out Rack (Stack #417), the dip room Vents 1 through 5 (Stacks #411-1 through 411-5) and the exhaust from the header system which provides make up air to the ovens. Emissions from these points shall then be vented to an RTO system with a minimum 95% destruction efficiency.
- iii. Replace the fans for ovens 17-21 with new fans each rated at no more than 10,000 cfm. Installation of these fans shall not affect the way the oven emissions are currently vented to an RTO system.
- iv. Vent emissions from the purge/cure cycles of oven #24 to an RTO system with a minimum 95% destruction efficiency.

c. Required Capture Efficiency in the Dip Room

Emission points within the dip room shall be subject to a nominal VOC capture of 83%. This capture shall be demonstrated as required by this permit. This increased capture will reduce VOC emissions from the facility by 39 tons per year.

2. Emissions Cap – NOx

a. Emission Cap

Permittee shall limit NOx emissions from the new Purge/Cure Oven # 24, PAA Oven replacement and Oxidizer #1 replacement authorized by revision V20600.R05, in any twelve-month period, to 26 tons.

b. Operational Limits and Controls

Permittee shall only use natural gas to fuel the PAA Oven replacement and Purge/Cure Oven #24, and as auxiliary fuel for RTO system #3 and #4.

D. V20602.R06 New Equipment Minor NSR Limitations
[Federally enforceable provision, pursuant to Code §3-1-084(8/11/94)] (Code §3-1-081.A)

1. Emissions Cap - VOCs

a. Level of Control

Emissions from Purge/Cure oven #25 installed under permit revision V20602.R06 shall be reduced by control in an RTO system, with a minimum destruction efficiency of 95%.

b. Required Capture Efficiency

Emissions from the oven shall be subject to at least the 95% capture requirement determined per testing conducted in 2005.

2. Operational Limits and Controls - NOx

Permittee shall only use natural gas to fuel the Purge/Cure Oven #25.

E. V20602.R07 New Equipment Major-NSR Limitations
[Federally enforceable provision, pursuant to Code 3-3-250 (SIP-approved at 61 FR 15717, 4/9/96).] (Code §3-1-081.A)

1. Emissions Caps - Hazardous Air Pollutants (HAPs)

a. Permittee shall limit the facility-wide HAP emissions to a rolling 12-month total of less than 10 tons of any single HAP or less than 25 tons of a combination of HAPs.

2. Monitoring Requirements to Avoid HAP major source status
[Federally enforceable provision, pursuant to Code §3-1-084(8/11/94)] (Code §3-1-081.A)

a. In order to ensure that the HAP emissions cap is not exceeded, permittee shall:

i. Generate, by the 15th day of the month, a report of cumulative actual HAP emissions during the preceding calendar month; and

- ii. Generate, by the 15th day of the month, a report of cumulative actual HAP emissions during the preceding twelve calendar months.
 - b. Exceeding the HAPs emission cap shall constitute a violation of this permit for each day that emissions of the offending pollutant were emitted from any part of the facility during:
 - i. The calendar month in which the cap was exceeded; and
 - ii. Any subsequent calendar month in which the cap continues to be exceeded.
- 3. Best Available Control Technology (BACT)
[Mandated by 40 CFR §70.6(a)(1)] (Code §3-3-250)

Emissions from the following equipment shall be controlled by an RTO system, with a minimum destruction efficiency of 95%:
 - a. Purge/Cure Ovens #26, #27 and #28;
 - b. A-Cap Machine;
 - c. CCC Machines #1 and #2.
- 4. Timing and Progress of Construction (Code §3-3-210.4)

This permit modification 'R07 shall be subject to termination if the proposed construction has not begun within 18 months of permit issuance, or if during the construction work is suspended for more than 18 months.

- F. V20639.R03 Minor-NSR Limitations
[Federally enforceable provision, pursuant to Code §3-1-084(8/11/94)] (Code §3-1-081.A):
 - 1. Emissions from the following equipment shall be controlled in the same fashion as similar existing units, by an RTO system, with a minimum destruction efficiency of 95%:
 - Acousti-Cap Oven #1, #2, and #3, and Acousti-Cap Dip/Blot Machine #1, #2 and #3 as revised by V20639.R05;

Construction on the redesigned Acoustic-Cap Dip/Blot machine enclosure vent pipe duct work shall start within 18 months of the issuance of Permit Revision V20639.R05, or by January 8, 2016.

 - 335 Printlines.
 - 2. All natural gas burning equipment is subject to the NO_x, SO₂ and PM₁₀ standards included in Sections §§6.B.2, 6.B.3, 6.D.2 and 6.E.2.
- G. V20639.R04 Minor-NSR Limitations
[Federally enforceable provision, pursuant to Code §3-1-084(8/11/94)] (Code §3-1-081.A):

1. Emissions from the following equipment shall be controlled in the same fashion as similar existing units, by an RTO system, with a minimum destruction efficiency of 95%:
 - Prime Cure Ovens #121, #122, #123 and #124;
 - Purge Cure Ovens #29, #30, #31;
 - Corrugated Oven #2;
 - AL Flexcore Machine #2.

2. Emissions from the following equipment shall be controlled in the same fashion as similar existing units, by a dust collection system, which is BACT level control as determined in V20602.R07:
 - AL Flexcore Machine #1;
 - AL Flexcore Machine #2;
 - Dust Blow Out Booth;
 - FEMCO Saw #9;
 - FEMCO Saw #10;
 - FEMCO Saw #11.

3. All natural gas burning equipment is subject to the NO_x, SO₂, PM₁₀, and fuel standards included in Sections §§6.B.2, 6.B.3, 6.D, 6.E, and 6.F of this permit.

4. RTO #5 shall be equipped with a thermocouple or RTD to measure the temperature in the combustion zone and a differential pressure flow device or fan motor ammeter to measure the gas velocity or flow rate

H. V20639.R05 Minor-NSR Limitations

[Federally enforceable provision, pursuant to Code §3-1-084(8/11/94)] (Code §3-1-081.A):

1. Emissions from the following equipment shall be captured as described below and controlled by an RTO system, with a minimum destruction efficiency of 98%. The listed capture and control efficiencies are BACT level control as determined in the V20639.R05 Technical Support Document:
 - Purge Ovens #1, #2, #3, #4, #5, #6, #7, and #8 (100% capture efficiency);
 - Cure Ovens #1, #2, #3, #4, #5, #6, #7, #8, #9, #10, #11, #12, #13, #14, #15, #16, #17, #18, #19, #20, #21, #22, #23, and #24 (100% capture efficiency);

The Cool Down Phase of the Cure Ovens is not subject to control as long as the testing described in §7.B.3.e demonstrates insignificant emissions are released during the Cool Down Phase.

-Post Cure Oven #4 and #5 (100% capture efficiency)

The Cool Down Phase of the Post Cure Ovens is not subject to control as long as the testing described in §7.B.3.e demonstrates insignificant emissions are released during the Cool Down Phase.

-Dip Tanks #1, #2, #3, #4, #5, #6, #7, #8, and #9 (98% capture efficiency);

-HTP Glue Line #2 and #3(100% capture efficiency).

2. Emissions from the following equipment shall be captured as described below and controlled by an RTO system, with a minimum destruction efficiency of 98%. The listed capture and control efficiencies are requirements requested in lieu of additional testing, recordkeeping and monitoring:

- Prime Cure Ovens #125 and #126 (100% capture efficiency);

-Dip Room (secondary enclosure, negative pressure maintained and monitored);

- Mix Rooms #66a, #66b and #73

Tanks within the mix rooms (100% capture when closed)

Enclosures within the mix rooms (secondary enclosure for open tanks, negative pressure maintained and monitored when in use).

Construction on the redesigned Mix Room enclosures and mix tanks shall start within 18 months of the issuance of Permit Revision V20639.R05, or by January 8, 2016.

3. Emissions from the following equipment shall be controlled in the same fashion as similar existing units, by a dust collection system, which is BACT level control as determined in V20602.R07:

- FEMCO Saw #12, #13, #14, #15, and #16;

- Non-Metallic Trim Saw;

-Acousti-Cap Trim Saw.

4. Emissions from the following storage tanks shall be controlled by installation of fixed roof tanks equipped with pressure/vacuum vents, which is BACT level control as determined in the V20639.R05 TSD

-Above Ground Storage Tank (AST) #7, #8, #9, #10, #11, and #12

5. All natural gas burning equipment is subject to the NO_x, SO₂, PM₁₀, and fuel standards included in Sections §§6.B.2, 6.B.3, 6.D, 6.E, and 6.F of this permit.

6. RTO #6 and #7 shall be equipped with a thermocouple or RTD to measure the temperature in the combustion zone and a differential pressure flow device or fan motor ammeter to measure the gas velocity or flow rate.

7. Emissions Caps – Nitrogen Oxides (NO_x)

[Federally enforceable provision, pursuant to Code 3-3-250 (SIP-approved at 61 FR 15717, 4/9/96).] (Code §3-1-081.A)

- a. Permittee shall limit the facility-wide NO_x emissions to a rolling 12-month total of less than 100 tons.
- b. Monitoring Requirements to Avoid NO_x major source status
[Federally enforceable provision, pursuant to Code §3-1-084(8/11/94)] (Code §3-1-081.A)
 - i. In order to ensure that the NO_x emissions cap is not exceeded, permittee shall:

Generate, by the 15th day of the month, a report of cumulative actual NO_x emissions during the preceding calendar month; and

Generate, by the 15th day of the month, a report of cumulative actual NO_x emissions during the preceding twelve calendar months.
 - ii. Exceeding the NO_x emission cap shall constitute a violation of this permit for each day that emissions of the offending pollutant were emitted from any part of the facility during:

The calendar month in which the cap was exceeded; and

Any subsequent calendar month in which the cap continues to be exceeded.

I. V20661.000 Minor-NSR Limitations

[Federally enforceable provision, pursuant to 40 CFR 63 Subpart WWWW] (Code §3-1-081.A, 7-1-030):

1. Emissions from the following equipment shall be continuously controlled by the applicable management practices listed in Section §6.C.2 and are subject to the compliance requirements listed in Section §7.E.6 of this permit.

- CR III Washline – Equipment #110A
2. The following equipment triggers applicability under 40 CFR 63.11504.a.1.iii. Since this equipment does not trigger applicability under 40 CFR 63.11505.a the management practices listed in Section §6.C.2 and the compliance requirements listed in Section §7.E.6 of this permit do not apply.

- Flow Coat Booth – Equipment #420

J. VOC Facility-Wide PSD Cap

[Federally enforceable provision, pursuant to Code §3-1-084 (8/11/94)] (Code §3-1-081.A)

Permittee shall limit the facility-wide VOC emissions to a rolling 12-month total of 300 tons.

K. V20602.R07 - PSD-Implied Cap on VOC Emission
[Federally enforceable provision, pursuant to Code §3-1-084 (8/11/94)] (Code §3-1-081.A)

Before commencing any change in the method of operation that will produce an increase in VOC emissions of 40 tpy or more, Permittee shall obtain approval of a significant revision/major modification of this permit. For purposes of this limitation, change in the method of operation includes introduction of new or substitute VOC-containing product formulations, and including any directly associated modifications. However, this requirement is subject to the following limitations:

1. VOC-Containing Material for purposes of this section shall mean those materials that contain VOCs as defined in Pinal County Code §1-3-140.147 except for materials with anticipated use of less than 2,000 tons per year and with a VOC concentration less than 1% by weight.
2. Where the increased emissions occur as a result of emissions with a unit that already falls subject to a capture-and-control requirement, permittee may invoke the benefit of that inherent control and only the net after-control increase shall count with respect to that 40 tpy threshold.
3. Emission changes associated with independent changes in the method of operation need not be aggregated with respect to the 40 tpy threshold. The burden rests with the Permittee to establish that changes in the method of operation are in fact independent and are not directly associated.
4. Permittee shall establish a log of new or substitute volatile product formulations, and unless a new formulation is subject to a permit revision application as described above, shall provide written notice to the Control Officer within 30 days of the introduction of any VOC-containing product that the Permittee anticipates using in excess of a total mass of 20 tons per year.

5. Other Derivative Non-NSR Permit-Based Limitations

A. Generally

1. These limitations derive from operating permit limitations imposed under current and prior permits, and are included at the voluntary request of the Applicant/Permittee.
2. Applicable Limitations (Code §3-1-082)

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

B. PCAQCD Permit Number A20422, Attachment B Limitations

1. Opacity Limitation

Visible emissions from all aspects of the operation shall be kept below 20 percent opacity for equipment and below 40 percent opacity for yards and open areas.
2. Baghouse Operation

Permittee shall operate three baghouses, and corresponding emission collection systems, to reduce particulate matter from saws (Emission units 550A through 550M) at an efficiency of 99% or higher.

3. Labeling of Raw Materials

All volatile organic compounds or material containing volatile organic compounds shall be labeled accurately.

C. Derivative VOC Control Limitations; Continuation of Control Effort
[Federally enforceable provision, pursuant to Code §3-1-084 (8/11/94)] (Code §3-1-081.A)

As a voluntarily requested limitation to continue the level of control previously required under the now-defunct "40#/15# rule," Permittee shall maintain and operate the existing VOC capture and control system to effectively achieve an on-going continuation of the existing level of control.

1. Control Required for Affected Group 1 Emission Units

a. Group 1 Emission Units - Definition

The following devices, which are all vented to an RTO system on a full-time basis, shall be designated as Group 1 emission units.

Emission Unit #	Stack #	Stack Description	% VOC Loading to oxidizer ²	Nominal Minimum Capture %
010	011	Ceramic prepreg tower vent	0.0%	95%
120A	123	PAA vent	0.4%	95%
130	131	Foil coater vent	1.3%	95%
160	161	UD tapeline vent	4.1%	95%
210	211	#335 Printline vent	6.6%	95%
230A	231	#7 Printline vent	9.9%	95%
240	241	Al Flexcore Machine vent	0.8%	95%
250	251	CNF Printing	0.1%	95%
260 series		HRP/HTP lines	0.6%	95%
260A	261	HRP Glue Line vent	included in #260	95%
260B	262	HTP Machine vent	included in #260	95%
310	311	Tapeline vent	0.5%	95%
410E	418	Skybond dip tank vent	(Presumed < 1.0%)	95%

² See 10/27/03 application revision; this distribution reflects actual VOC emissions from the 2002 emission inventory, adjusted to exclude acetone from the definition of VOC.

410K		F660 Dip Tank	< 1%	95%
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b. Required Level of Control

VOC emissions from Group I emission units shall be reduced with a net control efficiency of 90%, and that control efficiency shall reflect the combination of capture efficiency and destruction efficiency of the RTO systems.

c. Required Capture Efficiency

Subject to the allowance for the Permittee to conduct unit-specific capture efficiency testing, coupled with a corresponding test of destruction efficiency for the relevant RTO system, which in combination show that some other capture efficiency still achieves an overall 90% level of control, Group 1 emission units shall be subject to a capture efficiency requirement as defined above in subparagraph a. Emissions from Group 1 emission units shall be captured and controlled by an RTO system.

2. Control Required for Affected Group 2 Emission Units

a. Group 2 Emission Units - Definition

The following devices shall be designated as Group 2 emission units. Emissions from Group 2 units shall be captured and controlled by an RTO system, as further required below.

Emission Unit #	Stack #	Stack Description	% VOC Loading to oxidizer ³	Nominal Minimum Capture %
270B	272	Corrugated aluminum P/C oven vent	1.2%	95%
440T/450T/460T		Resin purge/cure & cure ovens	72.1% (nominal)	95%
440T series	many	Purge/cure oven vents	inc. in 440T/450T/460T above	as above
450T series	many	Purge/cure oven vents	inc. in 440T/450T/460T above	as above
460T series	many	Purge/cure oven vents	inc. in 440T/450T/460T above	as above
470 Series		Corrugated/Graphite Cure Oven Vents	2.4%	99%
470A	471	Corrug./Graphite oven #1 vent	included in #470 above	
470B	473	Corrug./Graphite oven #4 vent	included in #470 above	
470C	475	Corrug./Graphite oven #5 vent	included in #470 above	

³ See 10/27/03 application revision; this distribution reflects actual VOC emissions from the 2002 emission inventory, adjusted to exclude acetone from the definition of VOC.

b. Required Level of Control

VOC emissions from Group 2 emission units shall be reduced with a net control efficiency of 90%, and that control efficiency shall reflect the combination of capture efficiency, the extent of by-pass directly to the atmosphere, and destruction efficiency of the RTO systems.

c. Required Capture Efficiency

Subject to the allowance for the Permittee to conduct unit-specific capture efficiency testing, coupled with a corresponding test of destruction efficiency for the relevant RTO system, and a quantification of emissions by-passed directly to the atmosphere, which in combination show that some other capture efficiency still achieves an overall 90% level of control, Group 2 emission units shall be subject to a capture efficiency requirement as defined above in subparagraph a.

3. Control Requirement for Affected Group 3 Emission Units

a. Group 3 Emission Units - Definition

The following devices, which constitute the combination of fugitive emission sources within the dip room, and those ovens which are tributaries from the sweeps within the dip room, shall constitute Group 3 emission units.

Emission Stack Unit #	Stack #	Description	% VOC Loading to oxidizer ⁴
Dip room and related emissions			72.1%
	410	Building 66 Dip Room vents 411-1	included in #410 above
	410	Building 66 Dip Room vents 411-2	included in #410 above
	410	Building 66 Dip Room vents 411-4	included in #410 above
	410	Building 66 Dip Room vents 411-5	included in #410 above
	410	Building 66 Dip Room vents 411-6	included in #410 above
	410	Building 66 Dip Room vents 417-2	included in #410 above
	440T	Purge/cure oven vents	included in #410 above
	450T	Purge/cure oven vents	included in #410 above

b. Required Level of Control

Combined emissions from the dip room equipment and the ovens tributary from the dip room collection sweeps shall be reduced by control in an RTO system, with a minimum destruction efficiency of 95%.

⁴ See 10/27/03 application revision; this distribution reflects actual VOC emissions from the 2002 emission inventory, adjusted to exclude acetone from the definition of VOC.

c. Required Capture Efficiency

Subject to the allowance for the Permittee to conduct a capture-testing program to quantify capture-efficiency for Group 3 emission points, aggregate emissions from affected Group 3 emission points shall be subject to an overall nominal 83% capture requirement as defined above in subparagraph a.

D. Emission Tracking at Group 1 Emission Units to Assess Need for Additional Capture Efficiency Testing

1. Future Changes at Existing Group 1 Emission Units

Permittee shall track future operational changes at existing Group 1 units that have not been previously tested for capture efficiency, and if operational changes, including production-rate changes, result in contribution of 2% or more of total VOC loading to RTO systems, then conduct a capture efficiency testing program with respect to the newly affected existing emission unit.

2. Additional Future Emission Units

New, future emission units will only be subject to generally prevailing applicable requirements, such as NSR/PSD or other relevant requirements, but not including the "derivative limitations" described above.

E. RTO Planned Shutdowns

Planned Shutdowns of the RTOs shall not be considered a deviation from the required pressure differential values or temperatures specified in this permit, and shall not require deviation reporting as required under §8.A of this permit provided that the following conditions are met:

1. All process emissions normally controlled by the RTO undergoing shutdown are either:
 - a. Stopped for the duration of the RTO shutdown, or
 - b. Controlled by another RTO that is operating within the appropriate temperature and pressure parameters established in this permit.
2. Records shall be kept indicating the date and the time the RTO was shutdown, date and time the RTO was restored, and how process emissions were controlled during the shutdown.

F. RTO Collection System

Negative Pressure Monitoring System; Minimum Negative Pressure Requirement

1. Permittee shall install and operate a pressure differential monitoring system in the trunk of RTO #2, Airex oxidizer #610B, and that monitoring system shall be capable of measuring the differential relative to atmospheric pressure, measured in inches-of-water-column (" w.c. '). The system shall include a data recording system, and shall be configured to sample pressure differentials at least once every 15 minutes.

2. Based on a 1-hour average of observed pressure differential values, pressure in the collection duct trunk feeding the Airex oxidizer #610B shall not rise above -1.4" w.c.

G. RTO Operating Requirements

1. Minimum Destruction Efficiency

At a minimum, each RTO shall maintain a destruction efficiency of not less than 98%.

2. Temperature Monitoring System

The Permittee shall install and operate on each RTO unit a temperature monitoring system that continuously monitors the temperature in the oxidizer combustion zone, and that temperature monitoring system shall be accurate to within 0.75% of observed temperature. The continuous temperature monitoring system shall also be equipped with a system to log those temperatures, electronically or otherwise, at least once every 15 minutes. Each temperature monitoring system shall be equipped with an alarm, adequate to alert the permittee if instantaneous observed temperatures in the combustion zone fall below 1500° f.

3. Minimum Operating Temperature

Permittee shall maintain an average minimum temperature of 1500° f. in the combustion zone of each RTO unit, based upon a rolling 1-hour average of monitored temperatures, or another adequate temperature as demonstrated by a performance test. Observed excursions below that average minimum temperature shall trigger a requirement for a corrective action plan, as defined in the compliance section below.

4. Minimum Residence Time

The RTOs shall be operated with a minimum of 1 second residence time, per manufacturer.

5. Gas Flow Monitoring

Within 90 days of the start-up of operation of any RTO, Permittee shall install and operate on each RTO unit a gas flow meter that continuously monitors total gas flow through the unit. The meters shall be equipped with a system to log the gas flow, electronically or otherwise.

H. Excess Emissions

Other than cure oven emissions occurring during the last 75% of the purge/cure cycle, and this in no way relieves Permittee from controlling emissions from Group 2 units by at least 90%, bypassing emissions from any of the above-scheduled emission units around the oxidizers shall constitute a period of excess emissions.

6. Regulatory Emission Limitations

[Mandated by 40 CFR §70.6(a)(1)] (Code §3-1-081.A.2)

A. Allowable Emissions

1. General Limitation

[Code § 3-1-040 approved as a SIP Element at 65 FR79742 (12/20/2000) (]

- a. Permittee is authorized to discharge or cause to discharge into the atmosphere those emissions of air contaminants as set forth below. Unless exempted under Code §3-1-040.C., or authorized by a separate permit, by this permit or by a revision or operational change allowed under Chapter 3, Article 2 of the Code, Permittee shall not commence construction of, operate or make any modification to this source in a manner which will cause emissions of any regulated air pollutant in excess of the de minimis amount.
- b. To the extent a change in material formulation or addition of a process material can produce additional emissions, then that change or addition qualifies as a change in the method of operation.

2. Insignificant Activities

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

Apart from the authority of this permit, Permittee is authorized to discharge or cause to discharge into the atmosphere emissions from insignificant activities, as defined in Code §1-3-140.74a. Appendix B of this permit includes a non-limiting schedule of specific activities that the District concurs qualify for "insignificant" status.

B. Particulate Emissions Limitations

1. Spray Booth Controls

[Code 5-13-390 (10/12/95) approved as a SIP element at 61 FR 15717 (04/09/96)]

The spray booth (process 430) shall be an enclosed area operated with dry filters by the permittee to remove paint overspray from the spray booth at an efficiency of ninety-six (96) percent by weight or higher.

2. Opacity Limits

a. SIP Limitation

[Federally enforceable pursuant to PGAQCD Reg. 7-3-1.1 (6/16/80) approved as a SIP Element at 47 FR 15579 (4/12/82)]

The opacity of any plume or effluent shall not be greater than 40 percent as determined by reference method 9 in the Arizona Testing Manual.

b. Visibility Limiting Standard

[Federally enforceable pursuant to PCAQCD Code §2-8-300 (as amended 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 60, Appendix A.

3. Mass Emissions Limitation

a. SIP Limitation

[PGCAQCD Reg. 7-3-1.7 (3/31/75) approved as a SIP element at 43 FR 50531 (11/15/78)] (§5-21-930)

For equipment with a heat input capacity of less than 4,000 million Btu per hour, particulate emissions shall not exceed:

$Y = 1.02X^{-.231}$, where Y = maximum emissions in lbs./hr. for each million BTU per hour heat input, and X = maximum heat input capacity in million BTU per hour.

b. Particulate Emissions - Process Industries

[PGAQCD Reg. 7-3-1.8 (3/31/75) approved as a SIP element at 43 FR 50531 (11/15/78)] (§5-24-1030.A.1)

Permittee shall not cause, suffer, allow, or permit the discharge of particulate matter into the atmosphere from any existing process source whatsoever, except incineration and fuel-burning equipment, in excess of the amount calculated by the equations presented below:

1. For any process operating at a production process weight rate ("P") up to 30 tons-per-hour, allowable emissions ("E") shall not exceed:

$$E = 4.10 P^{0.67} \text{ pounds-per-hour.}$$

2. For any process operating at a production process weight rates ("P") equal to or greater than 30 tons-per-hour, allowable emissions ("E") shall not exceed:

$$E = (55.0 P^{0.11} - 40.0) \text{ pounds-per-hour.}$$

c. Particulate Emissions - Stationary Rotating Machinery

[PGAQCD Reg. 7-3-1.7 (amended 6/16/80) approved as SIP Element at 47 FR 15579 (4/12/82)] (Code §5-23-1013)

The maximum allowable emissions shall be determined by the following equation:

$$E = 1.02Q^{0.769} \text{ where:}$$

E = the maximum allowable particulate emissions rate in pounds-mass per hour and

Q = the total heat input of all operating fuel-burning units of stationary rotating machinery on the premises in million Btu/hr.

4. Fugitive Emission Limitation

[PGCAQCD Reg. 7-3-1.2.A approved as a SIP element at 43 FR 50531 (11/15/78)]

No person shall cause, suffer, allow or permit a building or its appurtenances or open area to be used, constructed, repaired, altered, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Dust and other types of particulates shall be kept to a minimum by such measures as wetting down, covering, landscaping, paving, treating or by other reasonable means.

5. Abrasive Blasting Controls
(Code §5-4-160)

Any abrasive blasting operation shall use at least one of the following control measures:

- a. Confined blasting.
- b. Wet abrasive blasting.
- c. Hydroblasting.
- d. A control measure that is determined by the Control Officer to be equally effective to control particulate emissions.

C. CAA §112 MACT Limitations
(Code §3-1-081)

1. Aerospace Manufacturing and Rework Facilities MACT
(40 CFR Part 63, Subpart GG; 40 CFR §63.740 et seq.)

a. General Standards
(40 CFR §63.743(a))

Permittee shall comply with the following sections of 40 CFR Part 63, as provided in 40 CFR §63.743(a):

- i. §63.4, Prohibited activities and circumvention;
- ii. §63.5, Construction and reconstruction; and
- iii. §63.6 Compliance with standards and maintenance requirements.

b. Housekeeping Measures
(40 CFR §63.744)

Cleaning of the metallic and nonmetallic honeycomb cores shall comply with the requirements in the following paragraphs:

- i. Place used solvent-laden cloth, paper, or any other absorbent applicators used for cleaning in bags or other closed containers. Ensure that these bags and containers are kept closed at all times except when depositing or removing these materials from the container. Use bags and containers of such design so as to contain the vapors of the cleaning solvent. Cotton-tipped swabs used for very small cleaning operations are exempt from this requirement.

- ii. Store fresh and spent cleaning solvents, except semi-aqueous solvent cleaners, in closed containers.
 - iii. Conduct the handling and transfer of cleaning solvents to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or spent cleaning solvents in such a manner that minimizes spills.
 - c. Recordkeeping requirements
(40 CFR §63.752(a)):

Permittee shall fulfill all recordkeeping requirements specified in §63.10(a), (b), (d) and (f).
 - d. Reporting Requirements
(40 CFR §63.753)
 - i. Permittee shall fulfill the requirements contained in §63.9(a) through (e) and (h) through (j), Notification requirements, and §63.10(a), (b), (d), and (f), Recordkeeping and reporting requirements, of the General Provisions, 40 CFR Part 63, Subpart A.
 - ii. Permittee shall submit semiannual reports occurring every 6 months from the date of the notification of the compliance status that identify:

A list of any new cleaning solvents used for hand-wipe cleaning in the previous 6 months, and as appropriate, their composite vapor pressure or notification that they comply with the composition requirements specified in §63.744(b)(1).

If the operations have been in compliance for the semiannual period, Permittee shall submit a statement that the cleaning operations have been in compliance with the applicable standards. Permittee shall also submit a statement of compliance signed by a responsible company official certifying that the facility is in compliance with all applicable requirements.
2. Area Source Standards for Plating and Polishing Operations – CR III Washline
[40 CFR Part 63, Subpart WWWW, 40 CFR Part 63.11507.g]
- a. Minimize bath agitation when removing any parts processed in the tank, as practicable except when necessary to meet part quality requirements.
 - b. Maximize the draining of bath solution back into the tank, as practicable, by extending drip time when removing parts from the tank; using drain boards (also known as drip shields); or withdrawing parts slowly from the tank, as practicable.
 - c. Optimize the design of barrels, racks, and parts to minimize dragout of bath solution (such as by using slotted barrels and tilted racks, or by designing parts

with flow-through holes to allow the tank solution to drip back into the tank), as practicable.

- d. Use tank covers, if already owned and available at the facility, whenever practicable.
- e. Minimize or reduce heating of process tanks, as practicable (e.g., when doing so would not interrupt production or adversely affect part quality).
- f. Perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment associated with affected sources, as practicable.
- g. Minimize bath contamination, such as through the prevention or quick recovery of dropped parts, use of distilled/de-ionized water, water filtration, pre-cleaning of parts to be plated, and thorough rinsing of pre-treated parts to be plated, as practicable.
- h. Maintain quality control of chemicals, and chemical and other bath ingredient concentrations in the tanks, as practicable.
- i. Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and periodic washdowns, as practicable.
- j. Minimize spills and overflow of tanks, as practicable.
- k. Use squeegee rolls in continuous or reel-to-reel plating tanks, as practicable.
- l. Perform regular inspections to identify leaks and other opportunities for pollution prevention.

D. Nitrogen Oxides Emission

1. Boilers and Water Heaters
[PGCAQCD Reg. 7-3-5.1.B approved as a SIP element at 43 FR 50531 (11/15/78)]
(Code §5-22-970)

The steam boilers and water heaters shall not emit more than 0.20 pounds of nitrogen oxides, maximum two-hour average, calculated as nitrogen dioxide, per million Btu heat input when gaseous fuel is fired, and 0.30 pounds of nitrogen oxides, maximum two-hour average, calculated as nitrogen dioxide, per million Btu heat input when liquid fossil fuel is fired.

2. RTOs and other Unclassified Sources
(Code §5-24-1030.A.3.)

The Permittee shall not emit more than 500 parts per million of nitrogen oxides expressed as NO₂ from the RTOs and any unclassified source.

E. Sulfur Dioxide Emissions

1. Boilers and Water Heaters

(Code §5-22-960)

The steam boilers and water heaters shall not emit more than 0.80 pounds of sulfur dioxide, maximum two hour average, per million Btu heat input when oil is fired.

2. RTOs and other Unclassified Sources
(Code §5-24-1030.A.2)

The permittee shall not emit more than 600 parts per million of sulfur dioxide from the RTOs and any unclassified source.

F. Fuel Use Limitations

[Federally enforceable pursuant to PCAQCD Code §3-1-081 (as amended 9/5/01) approved as a SIP element at 66 FR 63166 (12/5/01)]

1. Primary Fuels

a. The Permittee is allowed to burn natural gas in the thermal oxidizers, engines, heaters, boilers, ovens, and other devices.

2. Other Fuels

(Code §§3-1-081.G, 5-23-1010.F)

a. The Permittee shall not use used oil, used oil fuel, hazardous waste, and hazardous waste fuel (as defined in federal, state, or county codes and rules) without first obtaining a separate permit or an appropriate permit revision.

G. Partwashers

(Code §5-15-620)

1. Solvent cleaners/degreasers shall:

- a. Provide a leak-free container for solvents and articles being cleaned;
- b. Except for a remote reservoir cleaner using unheated solvent, be equipped with a cover which prevents the solvent from evaporating when not processing work;
- c. Be equipped with a drain configured to return solvent drained from cleaned parts to the container;
- d. Be clearly labeled to identify the solvent and explain the proper operation of the cleaner;
- e. A degreaser/cleaner with a remote reservoir shall:
 - i. Be equipped with a sink-like work area sloped sufficiently toward a drain so as to prevent pooling of the solvent;
 - ii. Be equipped with drain from the sink to the reservoir, with a maximum drain area of 15.5 in²;
 - iii. Unless a low-volatility solvent with a boiling point above 248° f is utilized and the solvent is never heated above 120° f., a stopper shall be used to seal the drain opening or a cover placed over the sink when the device is not in use.
- f. A degreaser/cleaner without a remote reservoir shall:

- i. If the degreaser utilizes a low-volatility solvent with a boiling point above 248° f., and the solvent is not agitated in use, Permittee shall maintain a minimum 6" freeboard and keep the cover closed when the apparatus is not in use;
- ii. A cold degreaser using solvents which are not low volatility or which are agitated or are heated above 120° F shall have internal drainage and:
 - (1) Have a freeboard ratio of 0.75 or greater; or
 - (2) A water cover may be used to meet the freeboard requirement if the solvent is insoluble in and denser than water; and
 - (3) A cover shall be used that is of a sliding or rolling type which is designed to easily open and close without disturbing the vapor zone.
- iii. Be equipped with a clear and conspicuous mark for the maximum allowable solvent level;
- iv. As an alternative to the foregoing freeboard requirement, be equipped with a hood or enclosure with a ventilation rate of no less than 65 cfm per ft.² of evaporative surface, unless a more stringent requirement applies pursuant to OSHA requirements, and the overall control efficiency of emissions from the cleaner, considering both capture and destruction, shall not be less than 85%.

2. Permittee shall operate the cold solvent cleaners/degreasers in accordance with the operating requirements listed in Code §5-15-620.H. Each cold solvent/degreaser shall have a permanent, conspicuous label which summarizes the relevant operating requirements.

H. General Maintenance Obligation

(Code §§3-1-081.A.2, 3-1-081.A.8.a, 3-1-081.E.2, 3-1-081.E.1., approved as Title V permit program elements 61 FR 55910 (10/30/96); also see ARS §§49-481(A), 49-487(B))

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.

I. Additional Applicable Limitations

1. Asbestos NESHAP Compliance
[Currently federally enforceable; 40 CFR Part 61, Subpart M] (Code §§7-1-030.A.8, 7-1-060)

Permittee shall comply with Code §§7-1-030.A.8 and 7-1-060 and 40 CFR Part 61, Subpart M, when conducting any renovation or demolition activities at the facility.
2. Stratospheric Ozone and Climate Protection
[Currently federally enforceable; 40 CFR Part 82 Subpart F] (Code §§1-3-140.15, 1-3-140.58.k)

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

3. Disposal Limitation
[Code 5-13-390 (10/12/95) approved as a SIP element at 61 FR 15717 (04/09/96)]

No person shall, during any one day, dispose of a total of more than one and one-half gallons of any photochemically reactive solvent, as defined in §5-12-370, or of any material containing more than one and one-half gallons of any such photochemically reactive solvent, by any means which will permit the evaporation of such solvent into the atmosphere.

7. Compliance Demonstration

- A. General Provisions
[Mandated by 40 CFR §70.6(a)(3)]

1. Generally Applicable Test Program Requirements

Unless specified otherwise in defining a particular testing requirement, all required tests shall conform to the following requirements.

- a. Test Requirement

Test shall be required as defined elsewhere in this permit. Tests shall be performed at the maximum practical production rate.

- b. Test Protocol

Required tests shall use standard EPA test methods (40 CFR Part 60). At least 60 days before the test, Permittee shall submit test protocol to PCAQCD for review and approval; Permittee shall provide notice of the performance test at least 30 days prior to running the test.

- c. Timing of initial and subsequent tests

Required tests shall be conducted within 180 days of the commissioning of new or modified equipment.

- d. Test Report

A copy of the test report shall be submitted to the District for approval within forty-five days after the test.

- e. Deferrals (Not applicable to Group 1 Units)

For good cause, the Control Officer may extend any of the times specified in this subsection to no later than 12 months after issuing this permit, and the Administrator may extend that by an additional 12 months after the initial deferral.

2. Recordkeeping
[Mandated by 40 CFR §70.6(a)(3)] (Code §3-1-083)

- a. Permittee shall maintain at the source, a file 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.
 - b. Permittee shall 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. For purposes of this provision, a "shut-down" means a cessation of operations at the entire facility for more than seven days, and a "start-up" constitutes the reactivation of the facility after a "shut-down."
- B. Compliance with "Authority to Construct" Limitations
[Mandated by 40 CFR §70.6(a)(3)]
1. Compliance with HAP Emission Cap

To comply with the HAPs emissions cap as specified in Section 4.E.1 of this permit, Permittee shall on the 15th day of each month calculate actual 12 month rolling emissions and a 12-month rolling emissions "budget". This emission budget shall be based on the past 10 months of historical emissions data and the amount of emissions (or emissions budget) that could be allowable in the upcoming 2 months (including the current month) without exceeding the less than 10/25 tons per year HAPs emission cap.
 2. Compliance with NO_x Emission Cap

To comply with the NO_x emissions cap as specified in Section 4.H.7 of this permit, Permittee shall on the 15th day of each month calculate actual 12 month rolling emissions and a 12-month rolling emissions "budget". This emission budget shall be based on the past 10 months of historical emissions data and the amount of emissions (or emissions budget) that could be allowable in the upcoming 2 months (including the current month) without exceeding the less than 100 tons per year NO_x emission cap.
 3. Compliance with the PSD-implied Cap on VOC Emission Changes

Permittee shall implement a system to track VOC emission changes resulting from changes in or additions of process materials that will emit VOCs within the facility.

 - a. Any new or modified VOC-containing material which, based upon projected usage rates, will result in a VOC emissions increase of 1 tpy should be entered into a tracking system.
 - b. For new/modified VOC-containing materials, which based upon projected usage rates will be used at rate of less than 20 tpy of total mass per year, purchasing records should be logged on a monthly basis for at least 2 years after introduction. The mass of directly associated product changes should be treated as one mass. Emissions should be reported annually as part of the VOC inventory, based on (permittee's choice) of purchasing records or records of actual use.

- c. For new/modified VOC-containing materials, which based upon projected usage rates will be used at rate of more than 20 tpy of total mass per year, records of actual use should be logged on a monthly basis for at least 2 years after introduction. Corresponding product-specific emissions should be calculated on a monthly basis, and product-specific emissions should be aggregated on a monthly basis for at least 2 years after introduction. Emission calculations may invoke the limitations of the underlying PSD-implied Cap spelled out in this permit. The emissions of directly associated product changes should be treated as one total. Emissions should be reported annually as part of the VOC inventory, based on purchasing records or records of actual use.
4. Demonstration of Insignificant Emissions
- a. Permittee shall submit test protocols to the District for the tests described in this section at least 60 days before the test.
 - b. Permittee shall provide notice of the test to the District at least 15 days prior to running the test.
 - c. A copy of the test report shall be submitted to the District for approval within 45 days after the test.
 - d. Purge to Cure Oven Transfer
 - i. Permittee shall conduct testing within 60 days after achieving maximum production, but no later than 180 days after commissioning, of the separated Purge and Cure Ovens to verify that the emissions during block transfer are insignificant.
 - ii. Permittee shall remove sample cores from the purge oven right after the completion of purge cycle, place the sample purged core on a scale for a period equal to the longest transit period any core may be subject to, and determine the change in core weight during that time.
 - iii. The change in core weight shall be recorded and the transit VOC emissions shall be calculated by assuming all weight loss is the result of VOC evaporation from the purged core. In case no measurable weight loss is observed, PCAQCD will consider it a sufficient demonstration that the transit emission is insignificant.
 - iv. Permittee shall test at least one representative core dipped with each dominant resin mixture (R169 and Clark) for verification of insignificant emissions during block transfer. In case measureable weight loss is recorded during the initial test, two additional cores from each resin shall be tested and the average weight loss from each set of 3 cores shall be used to evaluate block transfer emissions.
 - v. Should the testing not demonstrate insignificant emissions the Permittee shall develop and submit a compliance plan to the District within 45 days of the test date. Submittal of a compliance plan does not

relieve the Permittee from any other obligations or potential liability associated with excess emissions.

- e. Cure Ovens – Phase 3, “Cool Down”
 - i. Permittee shall conduct testing within 60 days after achieving maximum production, but no later than 180 days after commissioning, of the separated Purge and Cure Ovens to verify that the “Cool Down” phase emissions are insignificant.
 - ii. The test will involve measuring the VOC concentration and flow rate being discharged to the atmosphere and shall utilize EPA Method 320.
 - iii. Permittee shall test at least one representative core dipped with each dominant resin mixture (R169 and Clark) for verification of insignificant emissions during the cool down phase.
 - iv. Should the testing not demonstrate insignificant emissions the Permittee shall develop and submit a compliance plan to the District within 45 days of the test date. Submittal of a compliance plan does not relieve the Permittee from any other obligations or potential liability associated with excess emissions.
 - f. Acousti-Cap Dip/Blot Machine Enclosure
 - i. Permittee shall conduct testing within 60 days after achieving maximum production, but no later than 180 days after commissioning of the redesigned Acousti-Cap enclosure to verify the evaporative emissions associated with the Acousti-Cap dip pans.
 - ii. The test will involve measuring the rate and quantity of evaporative VOC emissions from a container of NMP placed in the enclosure for at least one week. The change in weight over time of this container and the container’s surface area will then be utilized to calculate a scaled VOC evaporative emission quantification for the Acousti-Cap Dip pans.
 - ii. The testing results may be utilized in future permitting decisions concerning the Acousti-Cap Dip/Blot Machines.
5. Demonstration of Capture Efficiency
- a. Permittee shall submit test protocols to the District for the above tests at least 60 days before the test.
 - b. Permittee shall provide notice of the test to the District at least 15 days prior to running the test.
 - c. A copy of the test report shall be submitted to the District for approval within 45 days after the test.

- d. Dip Tank Capture Efficiency
 - i. Permittee shall conduct testing within 60 days after achieving maximum production, but no later than 180 days after commissioning, of the redesigned Dip Tanks to demonstrate the capture efficiency of the units
 - ii. Testing shall utilize EPA Method 204.
 - iii. Permittee shall test at least one dip tank with Clark resin mixture, which has a higher VOC and HAP content than R169 resin, for verification of dip tank capture efficiency.
 - iv. Should the testing not demonstrate at least 98% capture efficiency as required by §4.H.1 the Permittee shall develop and submit a compliance plan to the District within 45 days of the test date. Submittal of a compliance plan does not relieve the Permittee from any other obligations or potential liability associated with excess emissions.
- e. Dip Room Negative Pressure Demonstration
 - i. Permittee shall conduct testing within 60 days after achieving maximum production, but no later than 180 days after commissioning, of the redesigned Dip Room to demonstrate that the dip room has been designed and built to maintain the room at a negative pressure, thereby allowing all the emissions captured by this secondary enclosure to be routed to an RTO
 - ii. Testing shall verify the direction of air flow through all natural draft openings is inward. The continuous inward flow of air shall be verified using streamers, smoke tubes, or tracer gases. The direction of air flow shall be monitored for at least 1 hour, with checks made no more than 10 minutes apart.
 - iii. Should the testing not demonstrate the ability to maintain a negative pressure the Permittee shall develop and submit a compliance plan to the District within 45 days. Submittal of a compliance plan does not relieve the Permittee from any other obligations or potential liability associated with excess emissions.
- f. Mix Rooms VOC Capture Demonstration
 - i. Permittee shall conduct testing within 60 days after achieving maximum production, but no later than 180 days after commissioning of the redesigned Mix Rooms to demonstrate that each mix room has tanks or enclosures designed and built to route emissions to a RTO
 - ii. Testing for the mix tanks shall utilize EPA Method 21 to confirm there is no leakage when the tanks are closed.

- iii. Testing for the secondary enclosures inside the mix rooms shall verify the direction of air flow through all natural draft openings is inward when in use. The continuous inward flow of air shall be verified using streamers, smoke tubes, or tracer gases. The direction of air flow shall be monitored for at least 1 hour, with checks made no more than 10 minutes apart.
 - iv. Should the testing identify leaks on the mix tanks or demonstrate the inability to maintain a negative pressure on the secondary enclosures the Permittee shall develop and submit a compliance plan to the District within 45 days. Submittal of a compliance plan does not relieve the Permittee from any other obligations or potential liability associated with excess emissions.
 - g. HTP Glue Lines Capture Efficiency
 - i. Permittee shall conduct testing within 60 days after achieving maximum production, but no later than 180 days after commissioning, of the HTP Glue Line #3 to demonstrate the capture efficiency of the unit.
 - ii. Permittee shall use EPA Method 204
 - iii. Should the testing not demonstrate the 100% capture efficiency as required by §4.H.1 the Permittee shall develop and submit a compliance plan to the District within 45 days of the test date. Submittal of a compliance plan does not relieve the Permittee from any other obligations or potential liability associated with excess emissions.
 - h. Permanent Total Enclosure – Negative Pressure Verification
 - i. Permittee shall conduct a performance test to verify that the flow at each permanent total enclosure is negative within 60 days after achieving maximum production rate at each enclosure, but no later than 180 days after commissioning of each enclosure emission unit.
 - ii. Permittee shall use EPA Method 204.
 - iii. Should the testing not demonstrate the 100% capture efficiency as required the Permittee shall develop and submit a compliance plan to the District within 45 days of the test date. Submittal of a compliance plan does not relieve the Permittee from any other obligations or potential liability associated with excess emissions.
- C. Other Compliance Limitations
[Mandated by 40 CFR §70.6(a)(3)]
 - 1. Testing Requirement for Existing Group 1 Emission Units - except 335 Printline, #7 Printline and UD Tapeline.

At least 90 days before testing, a test protocol for quantifying capture efficiency shall be submitted to PCAQCD as well as EPA for review and approval.

- a. Tracking Requirement for RTO-contribution from Group 1 Emission Units that have not been tested for Capture Efficiency

On an annual basis, within 30 days of the end of each calendar year, Permittee shall review the emission data records required elsewhere under this permit, and shall identify any Group 1 Emission Units that contributed 2% or more of the VOC loading to the RTO systems, and which Group 1 Emission Units have not previously been tested for capture efficiency.

- b. Testing for Group 1 Emission Units that Contribute Over 2% RTO Loading in the Future

To the extent Permittee's review under preceding subparagraph b. identifies any previously un-tested units that contributed more than 2% in the preceding calendar year, Permittee shall, within 180 days, conduct a capture-efficiency-verification-test of such unit(s) in accord with preceding subparagraph a.

2. Non-instrumental emissions monitoring - VOC Emissions; Cap Compliance Verification

- a. Permittee shall maintain a list of all VOC-containing materials used at the facility in the manufacturing process. The list shall contain the following information:

- i. Name of the VOC containing material;
- ii. Process or equipment where the VOC-containing product is being used;
- iii. Manufacturer;
- iv. VOC content.

- b. To demonstrate compliance with the VOC emission cap under §5.H, the Permittee shall maintain calendar-month records, updated within 15 days of the close of each calendar month, containing the following information:

- i. Name of VOC-containing product and manufacturer;
- ii. Process or equipment where the VOC-containing product is being used;
- iii. VOC content (lb/gal, lb/lb or % by weight);
- iv. Source for VOC content data (e.g., MSDS, formulation sheet, container, etc.);
- v. Monthly usage of VOC containing product (gal or lb);
- vi. Percentage and pounds of VOC retained in the product;

- vii. Percentage and pounds of VOC captured in the RTOs;
 - viii. Percentage and pounds of VOC controlled by the RTOs;
 - ix. Percentage and pounds of VOC emitted to the atmosphere.
- c. Permittee shall maintain all the supporting documentation, including but not limited to calculations, log sheets, MSDS sheets, emission factors, formulations and measurements used to determine VOC emissions and make it readily accessible to the Control Officer upon request.
- i. Permittee shall annually review and update the supporting documentation to ensure its accuracy. Records of when this review took place and the changes made shall be kept and made accessible to the Control Officer upon request.
- d. Permittee shall maintain calculations of the 12 month rolling total VOC emissions to ensure that the emission cap defined elsewhere in this permit has not been exceeded.
3. RTO Operation Monitoring
- a. On a daily basis, Permittee shall physically inspect all RTO units to verify the structural integrity of each unit and that the units are in operation. The Permittee shall make a record of such inspection.
 - b. Except for during planned shutdowns, as defined in this permit, should the rolling average temperature in any RTO unit fall below 1500° F(1-hr average), or if one of the RTO units is non-operational, Permittee shall take such actions to curtail emissions, and shall investigate and report the cause and curative action taken within 10 days in accordance with the deviation reporting requirements of this permit.
 - c. On an annual basis, all RTOs shall be visually inspected for proper seating of the valves, and for accumulation of resin buildup in the valves. Permittee shall keep records of such inspections.
 - d. Negative Pressure Monitoring System; Negative Pressure Requirement
 - i. Permittee shall install and operate a continuous negative pressure monitoring system, consisting of pressure sensors / transducers, at various locations inside the duct system associated with the RTO units. The number and location of sensors / transducers must be strategically selected to monitor the negative pressure at each VOC pickup point. Negative pressure must be present at each VOC pickup point.
 - ii. The monitoring system shall be linked to an alarm system that notifies the operator when the pressure is no longer negative and is interlocked so that additional material cannot be add to the affected process until negative pressure is restored.

- iii. Permittee shall install pressure sensors / transducers that are capable of continuously monitoring negative pressure in the Dip Room. The monitoring device shall be connected to an alarm system capable of notifying the operator when the pressure is no longer negative. Upon notification of lack of negative pressure no additional material shall be added to the process until negative pressure is restored.
 - iv. Except for planned shutdowns, as defined in this permit, or periods where the Permittee can demonstrate thru operational records that no VOC emitting operations were being conducted in the associated enclosure or room, negative pressure deviations shall be reported pursuant to §8.A
- e. Negative Pressure; Maintenance System
- i. All Permanent Total Enclosures shall be equipped with self-closing doors.
 - ii. The Dip Tanks lids shall be equipped with seals to prevent leakage when closed and shall be closed during normal operating conditions;
 - iii. The Mix Tank lids shall be equipped with seals to prevent leakage when closed and shall be closed except when being accessed.
 - iv. The Mix Tanks containing resin shall be placed in a secondary enclosure inside the mix room when the lids are open. Mix Tanks that have been emptied and cleaned or that have closed lids are not required to remain in the enclosure.
- f. Calibration and Testing of Negative Pressure System
- i. On at least an annual basis, all negative pressure sensors / transducers shall be calibrated per the manufacturer instructions. Permittee shall keep records of such calibration.
 - ii. Permittee shall annually demonstrate negative flow via testing at 20% of the VOC pickup points, excluding ovens. Testing shall verify the direction of air flow through all natural draft openings is inward when in use. The continuous inward flow of air shall be verified using streamers, smoke tubes, or tracer gases. The direction of air flow shall be monitored for at least 1 hour, with checks made no more than 10 minutes apart.
4. Cure Oven Cool Down Phase monitoring
- a. Permittee shall install and operate a Data Acquisition Handling System (DAHS) that records the number of minutes that each Cure and Post Cure Oven spends in “Cool Down” phase and “Cure” phase.

D. Compliance with Minor-NSR Limitations
[Mandated by 40 CFR §70.6(a)(3)]

1. RTO Testing - Destruction Efficiency Verification

- a. Permittee shall conduct a performance test to verify the destruction efficiency of any RTO within 60 days after achieving maximum production rate at which the RTO unit will be operated, but no later than 180 days after commissioning using EPA-approved method 320 .
- b. Permittee shall submit test protocols to the District for the above tests at least 60 days before the test.
- c. Permittee shall provide notice of the test to the District at least 15 days prior to running the test.
- d. A copy of the test report shall be submitted to the District for approval within 45 days after the test.
- e. Minimum Residence time values, specific to each RTO unit, shall be determined during the initial RTO performance test for each unit or shall be determined by engineering calculation, and shall be repeated if required in the event of the RTO being structurally modified.
- f. The destruction efficiency tests shall be repeated annually, no later than 12 months after the previous test of each RTO. The annual destruction efficiency tests shall be conducted using one of the following options;
-EPA Methods 18, 320 and EPA Method 25, 25A, or 25B
or;
-EPA SW-846 Method 0010, EPA Methods 18, 323 and EPA Method 25, 25A or 25B.
At least once every five years EPA Method 320 must be conducted. The first destruction efficiency test of all RTOs following issuance of permit V20639.R05 shall be conducted using EPA Methods 320.

2. RTO Operation Monitoring

Except for during planned shutdowns, as defined in this permit, should the rolling average temperature in any RTO unit fall below 1500° F(1-hr average), or if one of the RTO units is non-operational, Permittee shall take such actions to curtail emissions, and shall investigate and report the cause and curative action taken within 10 days in accordance with the deviation reporting requirements of this permit.

The 1500 F operational limit shall apply to the RTO units until individual operating ranges are established by testing as required by this permit. This interim operational temperature shall not prevent the Permittee from conducting tests that do not trigger the reporting requirements of §8.A during a 6 month shakedown period of the unit, under controlled performance testing conditions, of RTO temperatures below this one. Permittee shall keep precise records of when these tests were conducted with a summary of results.

3. Compliance Assurance Monitoring (CAM) for RTOs
[Currently federally enforceable; see 40 CFR §64.1 et seq. (1997)]
- a. Indicators
- Combustion zone temperature and exhaust gas flow rate for each RTO shall be indicators of the RTOs performance.
- b. Permittee shall install a thermocouple or RTD on each RTO to monitor the combustion zone temperature and shall monitor the temperature in the combustion zone as follows:
- i. Automatically record the temperature at least every 15 minutes in units of Degrees Fahrenheit or Celsius (F or °C), using a digital data acquisition handling system (DAHS);
 - ii. Annually calibrate the thermocouple or RTD.
- c. Permittee shall install a differential pressure flow device or fan motor ammeter at each RTO and shall monitor the change in pressure of the gas velocity or flow rate through the RTO as follows:
- i. Automatically record the exhaust flow rate at least every 15 minutes in units of cubic feet per minute (flow), or amps (current) using a digital data acquisition handling system (DAHS);
 - ii. Annually calibrate the differential pressure flow device or ammeter.
- d. Except during planned RTO shutdown periods, and controlled engineering evaluations as defined in §5.E, any of the following shall constitute an “excursion” during operations:
- i. Temperatures in the combustion zone outside of the range established in §7.D.3.e of this permit;
 - ii. Flow rates measured at the outlet of the RTO outside the range established in §7.D.3.e of this permit.
- e. At least 60 days before the testing required for each RTO, Permittee shall prepare and submit to PCAQCD for approval a testing plan as required in §7.D that will demonstrate the destruction efficiency required by this permit and establish an operational range of temperature in the combustion zone and exhaust flow rate.

The testing plan shall provide for a demonstration of compliance for the chosen range of temperature and flow rate set at the minimum and maximum levels.

Permittee shall within 45 days after the submittal of the test report, submit to the Department and the Administrator, the operational ranges for the RTOs.

- f. Any excursion shall trigger corrective action to be initiated. All excursions will be documented and reported.
- g. Permittee shall maintain the monitoring equipment, including but not limited to maintaining necessary parts for routine repair of the monitoring equipment, in accordance with manufacturer's specifications.
- h. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance of control activities, Permittee shall conduct all monitoring at all times when the plant is operating.
- i. Malfunction of any DAHS, thermocouple or the differential pressure flow device, shall constitute a monitoring malfunction. Records shall identify the emission point or points affected by any monitoring malfunction.
- j. Any excursion, exceedance or monitoring malfunction shall require the operator to restore operation of the control and/or monitoring system to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of startup, shutdown or malfunction, and taking necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance.
- k. Permittee shall submit a Quality Improvement Plan (QIP) in accordance with 40 CFR §64.8 if any combination of excursions or monitoring malfunctions exceeds 3% of operating time, defined as 3 events in any given 100 calendar day period for a single RTO.
- l. Logs, excursion observations, exceedance observations and summaries of planned shutdowns shall all be subject to the recordkeeping and reporting requirements under the permit.
- m. If Permittee identifies a failure to achieve compliance with the CAM requirements, Permittee shall promptly notify the Department, and if necessary submit a revision to the permit to address the necessary monitoring changes.

E. Compliance with Regulatory Limitations
[Mandated by 40 CFR §70.6(a)(3)]

1. Non-instrumental emissions monitoring - oxides of nitrogen

As a surrogate measurement for monitoring emissions of oxides of nitrogen, Permittee shall maintain records reflecting total fuel consumption in the thermal oxidizers, ovens, engines, and other fuel burning equipment and the amount of VOC's sent to the thermal oxidizers. On an annual basis, no later than March 31st to adequately support the annual emission inventory, permittee shall calculate NOx emissions based on the fuel records. For these calculations, Permittee shall use emission factors from the specific equipment manufacturer, if available, or otherwise, AP-42 or other factors as approved by the Director.

2. Non-instrumental emissions monitoring - particulate matter

a. Baghouses

Since the use of baghouses are required to limit the emissions authorized under this permit, the Permittee shall inspect the baghouses and final exhaust fan at least once each day that the equipment vented to baghouses is operational, to determine that the baghouses are operating properly. Records of these inspections shall be maintained.

b. Spray Booth

I. At least once monthly, the Permittee shall check the spray booth pressure drop and record it in a log. If during any of these checks, the vacuum pressure has dropped below 0.05 inches of water, the Permittee shall investigate and record the curative action taken.

ii. At least once weekly, the Permittee shall inspect the spray booth (process #430) filters to determine if they need to be repaired or replaced. Records of these inspections, repairs and replacements shall be maintained.

3. Opacity monitoring
[Code §3-3-260.]

a. Stack Emissions

[PGCAQCD Reg. 7-3-1.1 approved as a SIP element at 47 FR 15579 (6/16/80)]

On at least a semi-annual basis, Permittee shall conduct a visual opacity screen performed on each process and fuel-burning exhaust stack. If visible emission in excess of 5% opacity 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. Submission of such a report may constitute cause to reopen this permit to add additional testing and/or control requirements.

b. Open-area Fugitive Emissions

[PGCAQCD Reg. 7-3-1.1 approved as a SIP element at 47 FR 15579 (6/16/80)]

On at least a semi-annual basis, Permittee shall conduct a visual opacity screen performed on the open areas of the facility. 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. Submission of such a report may constitute cause to reopen this permit to add additional testing and/or control requirements.

c. Baghouse and Exhaust Fans

On at least a semi-annual basis, Permittee shall conduct a visual opacity screen on the baghouse and exhaust fans. If visible emissions in excess of 5% opacity are observed, Permittee shall investigate and report the cause and curative action taken within 10 days in accordance with the deviation reporting requirements of this permit.

d. Abrasive Blasting

On at least a semi-annual basis, Permittee shall conduct a visual opacity screen performed on the abrasive blasting operation. If visible emissions in excess of 5% opacity are observed, Permittee shall investigate and report the cause and curative action taken within 10 days in accordance with the deviation reporting requirements of this permit.

4. NSPS monitoring -Polymeric Coating of Supporting Substrates
[40 CFR Parts 60.744(b), 60.747(b), 60.747(c)], Code §6-1-030.1 and a delegation from the EPA Administrator dated 2/24/93].

Pursuant to NSPS Subpart VVV, for the UD Tapeline (#160) .and the ceramic prepreg line, Permittee shall:

- a. Make semiannual estimates of the projected annual amount of VOC to be used at the coating operation in that year; and
- b. Maintain records of actual VOC use, and
- c. Maintain records of the semiannual estimates of the projected VOC use, and
- d. Report the first semiannual estimate in which projected annual VOC use exceeds the applicable cutoff to the District; and,
- e. Report the first 12-month period in which the actual VOC use exceeds the applicable cutoff to the District.

5. NSPS monitoring - Volatile Organic Storage Tanks
[40 CFR Part 60.110b(b), Code §6-1-030.1 and a delegation from the EPA Administrator dated 2/24/93].

Pursuant to NSPS Subpart Kb, since this facility does have affected volatile organic storage tanks with capacities above 10,470 gallons, but does not have any such tanks with a capacity above 19,632 gallons, Permittee shall retain on-site a record of the dimensions of the affected tanks, and a copy of a calculation showing the volumetric capacity of those affected tanks. Permittee need take no further action to comply with NSPS Subpart Kb.

6. NESHAP compliance – Chromium Process
[40 CFR Part 63.115.08.a, 11508.b, 11508.d, 11509.c, 11509.d]

Pursuant to NESHAP Subpart WWWW, for CR III Washline, Permittee shall:

- a. Annually document continuous compliance with the applicable management practices listed in Section §6.C.2 of this permit via the certification required by Section 8.C of this permit and/or;
 - b. Document deviations from the applicable management practices listed in Section §6.C.2 of this permit via the reporting requirements listed in Section 8.A of this permit.
7. Non-instrumental emissions monitoring - Solvent Cleaning VOCs
(Code §5-15-640)

To verify that solvent changes do not inadvertently cause a net significant increase in VOC emissions, Permittee shall keep the following records:

- a. Type and total amount of make-up solvent used in all solvent cleaning operations.
- b. Determination of emissions from wipe cleaning, which may be made on a facility-wide rather than a per department basis.
- c. Amount of volatile organic compound(s) and of non-precursors (exempt) organic compound(s) contained in each solvent, expressed in pounds per gallon or grams per liter. Such records shall be retained for two years and shall be made available to the Control Officer upon request.

8. Other Reporting Obligations

- A. Deviation Reporting Requirements⁶
[Mandated by 40 CFR §§70.6(a)(3)(iii)(B)] (Code §3-1-083.A.3.b)

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

- B. Regular Compliance Reporting
[Mandated by 40 CFR §70.6(a)(3)] (Code §3-1-083.A.3.a)

Permittee shall submit a semi-annual report containing a summary of the information required to be recorded pursuant to this permit, which summary shall clearly show whether or not Permittee has complied with the operational requirements and emissions limitations under this permit. All instances of deviations from permit requirements shall be clearly identified in such reports. For brevity, such deviation reports may incorporate by reference any written supplemental upset reports filed by Permittee during the reporting period. The report shall be submitted to the District within 30 days after the end of each calendar half. Appendix A of this permit is a form which may be used for the report.

⁶ Also see permit §10.P regarding reporting of "emergency" incidents.

C. Regular Compliance/Compliance Progress Certification
[Mandated by 40 CFR §70.6(c)(5)] (Code §3-1-083.A.4)

Permittee shall annually submit a certification of compliance with the provisions of this permit. The certification shall be separately submitted to both the District and to the Enforcement Office (AIR 5), EPA Region IX, 75 Hawthorne Street, San Francisco, CA 94105-3901. The certification shall:

1. Be signed by a responsible official, as defined in Code §3-1-030.18;
2. Identify each term or condition of the permit that is the basis of the certification;
3. State the compliance status with respect to each such term or condition;
4. State whether compliance with respect to each such term or condition has been continuous or intermittent;
5. Identify the method(s) used for determining the compliance status of the source, currently and over the reporting period; and
6. Be postmarked within thirty (30) days of the start of the calendar year.

D. Annual emissions inventory
 [Code §§3-1-103, 3-7-590.C.1.]

Since this source would be subject to an ADEQ permitting requirement, Permittee shall complete and submit to the District an annual emissions inventory, disclosing actual emissions for the preceding calendar year. The submittal shall be made on a form provided by the District. The inventory is due by the latter of March 31, or ninety (90) days after the form is furnished by the District.

9. Fee Payment
[Mandated by 40 CFR §§70.6(a)(7), 70.9] (Code §3-1-081.A.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.

10. General Conditions

A. Term
[Mandated by 40 CFR §70.6(a)(2)] (Code §3-1-089)

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

B. Basic Obligation
[Mandated by 40 CFR §§70.4(b)(15), 70.6(a)(6)(I), 70.6(a)(6)(ii), 70.7.b] (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.
3. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

C. Duty to Supplement Application
[Mandated by 40 CFR §§70.5(b), 70.6(a)(6)(v)] (Code §3-1-081.A.8.e.)

Permittee shall furnish to the District within a reasonable time, which shall not exceed thirty days unless the Control Officer fixes some other time period for response, any information that the Control Officer may request in writing to determine whether cause exists for revising, revoking, reissuing, 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 under this permit. For information claimed to be confidential, Permittee shall submit along with the requested information or records a showing as required under Code §3-1-120, and shall separately submit a full duplicate copy to the EPA Regional Office (Regional Administrator c/o Air Division Permits Office, EPA Region IX, 75 Hawthorne Street, San Francisco, CA 94105-3901).

D. Right to Enter
[Mandated by 40 CFR §70.6(c)(2)] (Code §§ 3-1-083.A.6, 3-1-132)

Authorized representatives of the District shall, upon presentation of proper credentials and while observing reasonable standard safety requirements as set forth by the owner or operator of the source, be allowed for purposes of ascertaining compliance with this permit and with other applicable requirements:

1. to enter upon the premises where the source is located, where emissions-related activity is conducted, 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;
3. to sample or monitor emissions from the source, or other substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements;
4. to have access to and copy, at reasonable times, any records that are required to be kept under the terms of this permit; and
5. to record any inspection by use of written, electronic, magnetic and photographic media.

E. Transfer of Ownership
[Mandated by 40 CFR §70.7(d)(4)] (Code §3-1-090)

This permit may be transferred under an administrative permit amendment 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
[Mandated by 40 CFR §70.6(a)(6)(iii)] (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
[Mandated by 40 CFR §§70.5(a)(2), 70.6(a)(3)(iii)(B)] [Code §§3-1-083.A.5, 3-1-175 (as amended 10/12/95) approved as SIP Elements at 61 FR 15717 (4/9/96)]

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
[Mandated by 40 CFR §§70.5(a)(1)(iii), 70.7(c)] (Code §3-1-050.C.2)

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
[Mandated by 40 CFR §70.6(a)(5)] (Code §3-1-081.A.7)

Pursuant to 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
[Mandated by 40 CFR §70.6(f)] (Code § 3-1-102.)

1. Generally

Subject to the following schedule of exclusions⁷, compliance with the terms of this permit shall be deemed compliance with any applicable requirement identified in this permit, including the Federally Enforceable requirements listed in Section 2. The permit-shield exclusions include:

- a. PGCAQCD Rule §7-2-1.8 ANTI-DEGRADATION;
- b. PGCAQCD Rule §7-3-1.3 OPEN BURNING;
- c. PGCAQCD Rule §7-3-4.1 INDUSTRIAL - CARBON MONOXIDE EMISSIONS;
- d. PGCAQCD Rule §7-1-2.6 RECORD KEEPING AND REPORTING;
- e. PCAQCD Rule §3-3-200 through §3-3-285 PERMIT REQUIREMENTS FOR NEW MAJOR SOURCES AND MAJOR MODIFICATIONS TO EXISTING MAJOR SOURCES.

2. NSPS Subpart VVV

The permit shield for Subpart VVV shall be void if the actual VOC emissions exceed the 95 Mg VOC threshold.

L. Permit Revisions
[Mandated by 40 CFR §70.7(d), 70.7(e)] (Code Chapter 3, Article 2, specifically Code §3-1-081.A.8.c)

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. Permit amendments, permit revisions, and changes made without a permit revision shall conform to the requirements in Article 2, Chapter 3, of the Code.

M. Permit Re-opening
[Mandated by 40 CFR §§70.6(a)(6)(iii), 70.7(f), 70.7(g)] (Code §3-1-087.)

1. This permit shall be reopened if:

⁷

See the Technical Support Document for an explanation of the exclusions.

- 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
[Mandated by 40 CFR §70.6(a)(3)(ii)(B)] (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
[Mandated by 40 CFR §70.6(a)(6)(iv)] (Code §3-1-081.A.8.d)

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

P. Excess Emission Reports; Emergency Provision
[Mandated by 40 CFR §70.6(g)] (Code §3-1-081.E, Code §8-1-030, A.R.S. §49-514)

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 pursuant to A.R.S. §49-514 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 72 hours of the time when emissions limitations were exceeded due to emergency. The notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective action taken.

11. Provisions Specifically Designated as Not Federally Enforceable
(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 8.D Annual emissions inventory
- C. Section 10.F Posting of Permit

12. Equipment
[Mandated by 40 CFR §70.5(c)(3)(ii)] (Code §3-1-050.B)

- A. Existing Equipment

EQUIP. NO.	EQUIPMENT NAME	MANUFACTURER/ DATE	SERIAL NO.	MODEL NO.	SIZE/CAPACITY
110A	CR III Washline	Hexcel/1994	NA	NA	110 fpm
120A	PAA/Primer Line	2007	NA	NA	3 MMBTU/HR
120B	PAA Acid Fume Scrubber	Tri-Mer Corp/1995	3130	F/S-1	2000 cfm
130	Foil Coater	Hexcel/1995	NA	NA	40 fpm
140C	Continuous Carbon Corrugator #1	Rosenthal Sheeter/1996	80403	WM-3-HHEC-24	25 fpm
140D	F35 Corrugator	Hexcel/1994	NA	NA	5 fpm
140E	F50 Corrugator	Hexcel/1994	NA	NA	5 fpm
140F	Continuous Carbon Corrugator #2	Rosenthal Sheeter/1998	80565	WM-3-HHC-24	25 fpm
160	UD Tapeline	Hexcel/1997	NA	NA	5 fpm

EQUIP. NO.	EQUIPMENT NAME	MANUFACTURER/ DATE	SERIAL NO.	MODEL NO.	SIZE/CAPACITY
200A	Mix Room 66a	Hexcel	NA	NA	NA
200B	Mix Room 66b	Hexcel	NA	NA	NA
200C	Mix Room 73	Hexcel	NA	NA	NA
210	#335 Printline	Hexcel/1968	NA	NA	1.6 MMBTU/HR
210A	#335 Printline				1.6 MMBTU/HR
230A	#7 Printline	Hexcel/1966	NA	NA	1.2 MMBTU/HR
230B	Aluminum Printline		NA	NA	1.2 MMBTU/HR
240	Al Flexcore Machine #1	Hexcel/1994	NA	NA	45,000 BTU/HR
240A	Al Flexcore Machine #2				50,000 BTU/HR
250	CNF Machine	Hexcel/1993	NA	NA	1000 °F
260A	HRP Glue Line	Hexcel/1975	NA	NA	30 fpm
260B	HTP Glue Line #1	Hexcel/2000	NA	NA	30 fpm
260D	HTP Glue Line #2	Wright Industries/2008	NA	NA	30 fpm
260E	HTP Glue Line #3	TBD	TBD	TBD	30 fpm
270A	Aluminum Corrugator	La Young Co./1970	27505	NA	10-15 fpm
270B	Aluminum Corrugator P/C Oven	Mayberry/1997	NA	NA	1.6 BTU/HR
280A	Graphite/HRP Printing & Layup	1994	NA	NA	Various layup tables
280B	Graphite/HRP Roll Coater	Black Brow./1996	196321	NA	15 fpm
280C	Graphite/HRP Roll Coater	Black Bros./1997	200985	NA	15 fpm
310	Tapeline (Steec)	Eclipse/1977	NA	NA	375 °F
310A	Skin Stick Machine #2				0.8 MM BTU/HR
410A	Dip Tank #1 (R-169)	TBD	TBD	TBD	4000 Gallons
410B	Dip Tank #2 (R-169)	TBD	TBD	TBD	4000 Gallons
410C	Dip Tank #3 (R-169)	TBD	TBD	TBD	4000 Gallons
410D	Dip Tank #4 (Clark)	TBD	TBD	TBD	4000 Gallons

EQUIP. NO.	EQUIPMENT NAME	MANUFACTURER/ DATE	SERIAL NO.	MODEL NO.	SIZE/CAPACITY
410E	Dip Tank #5 (Clark)	TBD	TBD	TBD	4000 Gallons
410F	Dip Tank #6 (Skybond)	TBD	TBD	TBD	4000 Gallons
410G	Dip Tank #7 (F-124)	TBD	TBD	TBD	4000 Gallons
410H	Dip Tank #8 (F-660)	TBD	TBD	TBD	4000 Gallons
410I	Dip Tank #9	TBD	TBD	TBD	4000 Gallons
410B-T	Dip Tank Center	Hexcel/1966	NA	NA	1500 Gallons
410C-T	Dip Tank South (2)	Hexcel/1982	NA	NA	1000 Gallons
410D-T	Dip Tank East	Southwest/1984	84-616	NA	4388 Gallons
410E-T	Skybond Dip Tank	Skybond/1995	NA	NA	300 Gallons
410F-T	Dip Room Blow Out Rack	Hexcel/1985	NA	NA	3000 cfm
410G-T	F124 Dip Tank	Hexcel 2009	NA	NA	500 Gallons
410H-T	Northeast Dip Tank	Hexcel/1966	NA	NA	4000 Gallons
410K-T	F660 Dip Tank	2009	NA	NA	300 gallons
410L-T	R169 Dip Tank #2	2009			
420	Flow Coat Booth	Hexcel/1984	NA	NA	15.5 cfm
430	Building 73 Spray Booth	Hexcel/1973	NA	NA	5000 cfm
440A	Cure Oven #1 (Single Oven)	Young & Bertke /1994	NA	NA	26 HP
440B	Cure Oven #2 (Single Oven)	Young & Bertke /1194	NA	NA	26 HP
440C	Cure Oven #3 (Single Oven)	Southwest Systems /1998	NA	NA	30 HP
440D	Cure Oven #4 (Single Oven)	Southwest Systems /1998	NA	NA	30 HP
440E	Cure Oven #5 (Single Oven)	Southwest Systems /1999	NA	NA	30 HP
440F	Cure Oven #6 (Single Oven)	Southwest Systems /1999	NA	NA	30 HP
440G	Cure Oven #7 (Single Oven)	Southwest Systems /1999	NA	NA	30 HP

EQUIP. NO.	EQUIPMENT NAME	MANUFACTURER/ DATE	SERIAL NO.	MODEL NO.	SIZE/CAPACITY
440H	Cure Oven #8 (Single Oven)	2006	NA	NA	30 HP
440I	Cure Oven #9 (Double Oven)	2006			4.80 MMBtu/hr
440J	Cure Oven #10 (Double Oven)	2007			4.80 MMBtu/hr
440K	Cure Oven #11 (Double Oven)	2008			4.80 MMBtu/hr
440L	Cure Oven #12 (Double Oven)	2009			100 HP
440M	Cure Oven #13 (Double Oven)	2009			100 HP
440N	Cure Oven #14 (Double Oven)	2009			100 HP
440O	Cure Oven #15 (Double Oven)				100 HP
440P	Cure Oven #16 (Double Oven)				100 HP
440Q	Cure Oven #17 (Double Oven)				100 HP
440R	Cure Oven #18 (Double Oven)				100 HP
440S	Cure Oven #19 (Double Oven)				100 HP
440T	Cure Oven #20 (Double Oven)				100 HP
440U	Cure Oven #21 (Double Oven)				100 HP
440V	Cure Oven #22 (Double Oven)				100 HP
440W	Cure Oven #23 (Double Oven)				100 HP
4440X	Cure Oven #24 (Double Oven)				100 HP
441	Cooling Lane				NA

EQUIP. NO.	EQUIPMENT NAME	MANUFACTURER/ DATE	SERIAL NO.	MODEL NO.	SIZE/CAPACITY
440A-T	Purge/Cure Oven #7 (single)	Southwest/1984	84-613	NA	23 HP
440F-T	Purge/Cure Oven #12 (single)	Southwest/1986	86-222	NA	26 HP
440H-T	Purge/Cure Oven #14 (single)	Young & Bertke/1994	NA	NA	26 HP
440I-T	Purge/Cure Oven #15 (single)	Young & Bertke/1994	NA	NA	26 HP
440J-T	Purge/Cure Oven #16 (single)	Young & Bertke/1994	NA	NA	26 HP
440K-T	Purge/Cure Oven #17 (single)	Southwest Systems/1998	NA	NA	50 HP
440L-T	Purge/Cure Oven #18 (single)	Southwest Systems/1998	NA	NA	50 HP
440M-T	Purge/Cure Oven #19 (single)	Southwest Systems/1999	NA	NA	50 HP
440N-T	Purge/Cure Oven #20 (single)	Southwest Systems/1999	NA	NA	50 HP
440P-T	Purge/Cure Oven #21 (single)	Southwest Systems/1999	NA	NA	50 HP
450A	Purge Oven #1	TBD	TBD	TBD	38 HP
450B	Purge Oven #2	TBD	TBD	TBD	38 HP
450C	Purge Oven #3	TBD	TBD	TBD	38 HP
450D	Purge Oven #4	TBD	TBD	TBD	38 HP
450E	Purge Oven #5	TBD	TBD	TBD	38 HP
450F	Purge Oven #6	TBD	TBD	TBD	38 HP
450G	Purge Oven #7	TBD	TBD	TBD	38 HP
450H	Purge Oven #8	TBD	TBD	TBD	38 HP
457-T	Purge/Cure Oven #22 (single)	2006	NA		50 HP
458-T	Purge/Cure Oven #23 (double)	2006	NA	NA	100 HP
459-T	Purge/Cure Oven #24 (quad)	2007	NA	NA	4.8 MMBtu/hr

EQUIP. NO.	EQUIPMENT NAME	MANUFACTURER/ DATE	SERIAL NO.	MODEL NO.	SIZE/CAPACITY
460A	Prime Cure Oven #121 (single)	Southwest/1968	82-22	NA	2.0 MMBTU/HR
460B	Prime Cure Oven #122 (single)	Mayberry/1998	97-31	NA	2.0 MMBTU/HR
460C	Post Cure Oven #4 (single)	Hexcel Asset #7376			4.0 MMBTU/HR
460D	Prime Cure Oven #123 (single)				2.0 MMBTU/HR
460E	Prime Cure Oven #124 (single)				2.0 MMBTU/HR
460F	Prime Cure Oven #125 (single)				2.0 MMBtu/HR
460G	Prime Cure Oven #126 (single)				2.0 MMBtu/HR
460H	Post Cure Oven #5				4.0 MMBtu/HR
470A	Corrugated Oven #1 (single)	Despatch/ 1994	68211	NA	1.5 MMBTU/HR
470C	Corrugated Oven #5 (single)	Mayberry/ 1998	97-15	NA	4.0 MMBTU/HR
470D	Corrugated Oven #2 (single)				2.0 MMBTU/HR
480-T	Purge/Cure Oven #25 (double)	2008	NA	NA	4.8 MMBTU/HR
481-T	Purge/Cure Oven #26 (double)	2009	NA	NA	4.8 MMBTU/HR
482-T	Purge/Cure Oven #27 (double)	2009	NA	NA	4.8 MMBTU/HR
483-T	Purge/Cure Oven #28 (double)	2009	NA	NA	4.8 MMBTU/HR
484-T	Purge/Cure Oven #29 (double)				60 HP
485-T	Purge/Cure Oven #30 (double)				60 HP
490-T	Four-Block Oven Cart (1)	2009	NA	NA	Used at Purge Cure Oven #24

EQUIP. NO.	EQUIPMENT NAME	MANUFACTURER/ DATE	SERIAL NO.	MODEL NO.	SIZE/CAPACITY
510A	Dust Collector #1	Torit-Donaldson /2001	IG648137	138HP11	11,000 CFM
510F	Dust Collector #6				
510H	Dust Collector #8				24,000 CFM
510I	Dust Collector #9				24,000 CFM
510J	Dust Collector #10				24,000 CFM
510K	Dust Collector #11				24,000 CFM
510L	Dust Collector #12				24,000 CFM
510M	Dust Collector #13				24,000 CFM
520A	Vacuum Bond Oven (single)	Wisconsin Oven/1991	NA	NA	1.5 MMBTU/HR
520B	Stress Relief Oven (single)	1995	Asset #216-1	NA	1.8 MMBTU/HR
520C	Heat Form Oven #1 (single)	Southwest/1985	NA	NA	1.6 MMBTU/HR
520D	Heat Form Oven #2 (single)				1.6 MMBTU/HR
520F	Corrugated Oven #6 (single)	Mayberry/1998	98-20	NA	1.5 MMBTU/HR
520L	Stress Relief Oven #2				1.80 MMBtu/HR
530A	Acousti-Cap Dip/Blot Machine #1	2006	NA	NA	
530B	Acousit-Cap Oven #1	2006	NA	NA	
530C	Acousti-Cap Dip/Blot Machine #2	2009	NA	NA	
530D	Acousti-Cap Oven #2	2009	NA	NA	
530E	Acousti-Cap Dip/Blot Machine #3	TBD	NA	NA	
530F	Acousti-Cap Oven #3	TBD	NA	NA	
530G-H	Septum Insertion Machines #1-2	2006	NA	NA	
530I-P	Septum Insertion Machines #3-10		NA	NA	

EQUIP. NO.	EQUIPMENT NAME	MANUFACTURER/ DATE	SERIAL NO.	MODEL NO.	SIZE/CAPACITY
531A-P	Septum Insertion Machines #11-26	TBD	NA	NA	
540D	Steec Press				
550A	Femco #1 Saw	Femco/1967	Asset #730004	NA	10 HP
550B	Femco #2 Saw	Femco/1967	60048-7597-80	A14-64	10 HP
550C	Femco #3 Saw	Femco/1985	NA	NA	10 HP
550D	Femco #4 Saw	Femco/1990	NA	NA	58"X120"X40"
550E	Blow Out Booth	Donaldson Co./1989	NA	ECB-3	100 fpm, 9 hp
550F	162 Saw	Tannewitz/1967	15506	G1N-E	15 HP
550G	Trim Saw	Do-All/1966	36463899	V36	120"X40"X72"
550H	Femco #9 Saw				20HP
550I	Femco #10 Saw				20 HP
550J	Femco #5 Saw	Femco/1998	146226	NA	
550K	CN Router	Accu-Router/1998	9046A001	46A	
550L	Femco #6 Saw	Femco/1998	NA	A-14	
550M	Femco #7 Saw	Femco/2000	00405	NA	
550N	Femco #12 Saw				20 HP
550O	Femco #13 Saw				20 HP
550P	Femco #14 Saw				20 HP
550Q	Femco #15 Saw				20 HP
550R	Femco #16 Saw				20 HP
550S	Non-Metallic Trim Saw				20 HP
550T	ACAP Trim Saw				20 HP
550U	Dust Blow Out Booth				
550V	Femco #11 Saw				20 HP

EQUIP. NO.	EQUIPMENT NAME	MANUFACTURER/ DATE	SERIAL NO.	MODEL NO.	SIZE/CAPACITY
610B	Thermal Oxidizer #2	Airex/1999	228130-RT02067	30.ORT095	2.7 MMBTU/HR
610C	Thermal Oxidizer #3	Adwest/2007	2232	48.ORTO	3.9 MMBTU/HR
610D	Thermal Oxidizer #4	Adwest/2007	2233	480.RTO	3.9 MMBTU/HR
610E	Thermal Oxidizer #5				3.9 MMBTU/HR
610F	Thermal Oxidizer #6				3.9 MMBTU/HR
610G	Thermal Oxidizer #7				3.9 MMBTU/HR
620A	Steam Boiler #1	Hurst/2000	S-400-250-1	NA	2.7 MMBTU/HR
620B	Steam Boiler #2	Hurst/2001	S-400-250-2	UNK	2.7 MMBTU/HR
620C	Steam Boiler #3	Eclipse/1974	43777	80SMGL-FSFM	2.7 MMBTU/HR
620D	Steam Boiler #4	Holman Bros./1997	7906	NA	3.3 MMBTU/HR
620E	Steam Boiler #5	Kewanee/ 1997	P7849	H35-200-G0	6.7 MMBTU/HR
620F	Steam Boiler #6				8.2 MMBTU/HR
620G	Steam Boiler #7				8.2 MMBTU/HR
620H	Steam Boiler #8				8.2 MMBTU/HR
630B	Hot Oil Heater #2	Fulton/1994	2322C	FT-0600-C	7.7 MMBTU/HR
630C	Hot Oil Heater #3	Fulton/1998	2754C	FT-0600-C	7.7 MMBTU/HR
630D	Hot Oil Heater #4				7.7 MMBTU/HR
630E	Hot Oil Heater #5				7.7 MMBTU/HR
630F	Hot Oil Heater #6				7.7 MMBTU/HR
630G	Hot Oil Heater #7				7.7 MMBTU/HR
630H	Hot Oil Heater #8				7.7 MMBTU/HR
640A	Chiller Engine A	Tecochill/ 1996	00383	150 TON	1.42 MMBTU/HR
640B	Chiller Engine B	Tecochill/ 1996	00381	150 TON	1.42 MMBTU/HR
650A	AST #1 IPA Storage Tank				6,462 GALLONS

EQUIP. NO.	EQUIPMENT NAME	MANUFACTURER/ DATE	SERIAL NO.	MODEL NO.	SIZE/CAPACITY
650B	AST # 2 MEK Storage Tank				6,462 GALLONS
650C	AST #3 Synasol Storage Tank				10,152 GALLONS
650D	AST # 4 R169 Resin Tank				10,152 GALLONS
650E	AST #5 Clark Resin Tank				10,152 GALLONS
650F	AST #6 Acetone Storage Tank				10,152 GALLONS
650G	AST #7 IPA Storage Tank				6,462 GALLONS
650H	AST #8 MEK Storage Tank				6,462 GALLONS
650I	AST #9 Synasol Storage Tank				10,152 GALLONS
650J	AST #10 R169 Storage Tank				10,152 GALLONS
650K	AST #11 Clark Resin Storage Tank				10,152 GALLONS
650L	AST #12 Acetone Storage Tank				10,152 GALLONS
660B	Hot Water Boiler #2	Teledyne Laars/2000	NA	HH3600EN09 K	3.6 MMBUT/HR
????	Guspro Oven #1				Lab
670F	Guspro Oven #2				Lab
NONE	Direct Contact Water Heater		090935175	DC-1-50	
1000	Partwasher - Cold Degreaser/Cleaner				19 GALLONS
1001	Partwasher - Cold Degreaser/Cleaner				38 GALLONS
1002	Partwasher - Cold Degreaser/Cleaner				28 GALLONS
1003	Part Washer - Remote reservoir				30 GALLONS

EQUIP. NO.	EQUIPMENT NAME	MANUFACTURER/ DATE	SERIAL NO.	MODEL NO.	SIZE/CAPACITY
1004	Partwasher - Cold Degreaser/Cleaner				38 GALLONS
1005	Partwasher - Cold Degreaser/Cleaner				28 GALLONS
1006	Partwasher - Cold Degreaser/Cleaner				38 GALLONS
1007	Partwasher - Cold Degreaser/Cleaner				28 GALLONS
1008	Partwasher - Cold Degreaser/Cleaner				19 GALLONS
1009	Partwasher - Cold Degreaser/Cleaner				19 GALLONS
1010	Partwasher-Remote Reservoir				55 GALLONS
1011	Partwasher - Cold Degreaser/Cleaner				19 GALLONS
1013	Partwasher - Cold Degreaser/Cleaner				38 GALLONS
1014	Partwasher - Cold Degreaser/Cleaner				40 GALLONS
1015	Partwasher - Cold Degreaser/Cleaner				19 GALLONS
1016	Partwasher - Cold Degreaser/Cleaner				19 GALLONS
1017	Partwasher - Cold Degreaser/Cleaner				28 GALLONS
1018	Partwasher - Cold Degreaser/Cleaner				19 GALLONS
1019	Partwasher - Cold Degreaser/Cleaner				13 GALLONS
1020	Partwasher - Cold Degreaser/Cleaner				38 GALLONS
1021	Partwasher - Cold Degreaser/Cleaner				19 GALLONS

EQUIP. NO.	EQUIPMENT NAME	MANUFACTURER/ DATE	SERIAL NO.	MODEL NO.	SIZE/CAPACITY
NONE	Temporary Storage Tank for Resin Adhesives (#335 Printline)				3,000 GALLONS
NONE	Comfort Heating and Cooling Units	multiple	multiple	multiple	13.20 MMBTU/HR

13. Emission Inventory Table

The technical support document for this permit revision, as well as TSDs for previous revisions include tables with proposed emissions from this facility;

Appendix A: Semi-annual Report

Permit V20661.000

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 - Hexcel Corporation
1214 W. Gila Bend Hwy 84, Casa Grande, Arizona

Parametric emissions report

Natural gas burned during reporting period _____ therms

Emissions report

Volatile organic compounds emitted during reporting period _____ Tons

Per NSPS Subpart VVV, do projected VOCs exceed 95 Mg (104.72 tons) per 12-month period?..... YES / NO

Per NSPS Subpart VVV, do actual VOCs exceed 95 Mg (104.72 tons) per 12-month period?..... YES / NO

HAP emission reportTotal HAPs _____ tons

.....Single HAP (highest single HAP) _____ tons

NOx emission report Total NOx _____ tons

Operations report

Has Permittee:

Maintained records and submitted reports required under §6.C.1 (NESHAP Subpart GG requirements)? YES / NO

Implemented the management practices as required under §6.C.2 (NESHAP Subpart WWWW requirements)? 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 §§6.I.1 and 6.I.2 of the permit during the reporting period.

Is such a supplemental disclosure attached? YES / NO

Maintained records required under §7.A.2 (generic recordkeeping)? YES / NO

Maintained records required under §7.B.1 (HAPs emissions budget)?..... YES / NO

Maintained records required under §7.B.2 (NOx emissions budget)?..... YES / NO

Reported all changes in VOC-containing materials in accordance with §7.B.3? YES / NO

During the reporting period, did Permittee comply with any applicable testing requirements that came due under §7? YES / NO

At calendar year-end, conducted the assessment required under §7.C.1.b (Screen for unit-specific emissions above 2% threshold)? YES / NO

Maintained monthly records required under §7.C.2 (VOC mass balance accounting)? YES / NO

Conducted the annual review required by §7.C.2.c (Supporting documentation)? YES / NO

Maintained records of inspections and monitoring required under §7.C.3 (RTO inspections and negative pressure monitoring)?..... YES / NO

Maintained records required under §7.D.3 (RTO operations)? YES / NO

Maintained records required under §7.E.1(Fuel consumption)? YES / NO

Maintained records required under §7.E.2 (Baghouse and spray booth inspections)? YES / NO

Maintained monthly records required under §7.E.3 (periodic opacity screening)..... YES / NO

Maintained the records required under §7.E.4? (NSPS Subpart VVV monitoring requirements) YES / NO

Maintained the records required under §7.E.5 (NSPS Subpart Kb monitoring requirements) YES / NO

Documented compliance as required under §7.E.6 (NESHAP Subpart WWWW requirements) YES / NO

Maintained records required under §7.E.7 (Solvent Cleaning VOCs)? YES / NO

Submitted all reports required under §8.A? (Upset reports)..... YES / NO

On a separate sheet, describe and explain any previously un-reported deviations from the terms of this permit. Is such a supplemental disclosure attached? 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 _____

Date _____

Contact Phone Number _____

Mail to - Pinal County Air Quality Control District
PO Box 987
Florence, AZ 85132

Appendix B: Insignificant Activities

- A. General information (Code §§ 1-3-140.74A, 3-1-050)
1. An insignificant is one which accounts for less than 1 percent of a source's emissions of conventional air pollutants or generates less than 200 pounds per year of regulated air pollutants. Additionally, an activity specifically listed as such in the Code is insignificant.
 2. Permit application need not provide emissions data regarding insignificant activities and such activities need not be listed in the permit. Insignificant activities need only be listed in the permit application.
- B. Non-exclusive list of insignificant activities.

Activities which may generate emissions in insignificant amounts include but are not limited to the following:

1. Short term maintenance activities including but not limited to:
 - a. Abrasive blasting
 - b. Painting
 - c. Solvent use
 - d. Steam cleaning
 - e. Equipment removal and replacement
 - f. Welding, brazing, and soldering operations
2. Operation of lab equipment:
 - a. Guspro Oven #1 and #2
3. Operation of cooling water, plant water, wastewater, and other water systems.
4. Emissions from testing and sampling
5. Research and development facilities
6. Storage of chemicals and fuels
7. Operation of emergency and standby equipment rated at less than 325 brake horsepower and used less than 72 hours per year.
8. Cooling Lane (Equipment No. 441)
9. Steec Press (Equipment No. 540D)
10. Septum Insertion Machines #1-2 (Equipment No. 530A-B respectively)
Septum Insertion Machines #3-10 (Equipment No. 530F-M respectively)
Septum Insertion Machines #11-26 (Equipment No. 531A-P respectively)