PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY

150 West Congress Street •Tucson, AZ 85701 •Phone: (520) 740-3340

AIR QUALITY OPERATING PERMIT

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

ISSUED TO

INTERFAB, INCORPORATED
3050 SOUTH ALVERNON WAY
TUCSON, AZ 85713

This air quality operating permit does not relieve applicant of responsibility for meeting all air pollution regulations

THIS PERMIT ISSUED SUBJECT TO THE FOLLOWING **Conditions contained in Parts A & B and Attachments C & D**

PDEQ PERMIT NUMBER **2905** PERMIT CLASS **I** EXPIRATION DATE **February 24, 2007**

PERMIT ISSUED THIS **25th** DAY OF **February 2002** *[Revision Issued June 29, 2006]*

SIGNATURE

Richard Grimaldi Deputy Director, PDEQ
TITLE

Permit Number 2905
Inter-Fab, Inc.
3050 S. Alvernon Way
Tucson, Arizona 85713

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SUMMARY

Inter-Fab, Inc. produces diving boards and pool slides for swimming pools, artificial rocks, boulders, fountains, waterfalls, and rock wall panels using acrylic-fiberglass composites. The company also powder coats and oven cures stainless steel railings, steel diving board stands, steel springs, and miscellaneous bolts and hardware. Wet coating, (using various types of paints), of the artificial rocks, boulders, etc. is also conducted on site as part of the production process. Interfab uses polyurethane and polyurea in the synthetic rock process; this activity has insignificant emissions of MDI (<24 lbs/year potential). For the diving board processes, some of the resin and gel-coat is applied manually with some being applied using flow coating equipment and techniques. The closed molding process uses spray application for the gel coating. The primary pollutant of concern is styrene, which is both a VOC and a HAP and is found in both the resins and the gel coats. None of the resins or gel coats used contains a vapor suppressant. Acetone is the clean-up solvent used at the facility.

The facility operates five paint booths – one for closed molding gel coating, one for powder coating and three for rock product spraying. The company operates primarily on a 10-hour per day, four day (Monday through Thursday) per week schedule (approximately 2080 hours per year).

Affected Emission Source Classification: Class I major source for HAPs, synthetic minor for VOCs and true minor for all other pollutants. The source is subject to the provisions of 40 CFR 63 Subpart WWWW National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, the Pima County State Implementation Plan (Pima County SIP) and Title 17 of the Pima County Code.

All terms and conditions of this permit are Federally Enforceable unless stated otherwise.

Emission Estimates: The following emission rates are included for reference purposes only and are not intended to be enforced by direct measurement unless otherwise noted herein. They were determined based on information supplied by the Permittee, the Unified Emission Factors for Open Molding of Composites (July 23, 2001) document, Subpart WWWW and standard EPA AP-42 emission factors. These emissions represent the source's potential-to-emit operating in compliance with the provisions of this Permit. These emissions shall not be considered as a case-by-case determination of an emission limit for the purpose of determining future permit revisions pursuant to Title 17 of the Pima County Code (PCC §17.12.255.A.3).

Pollutant	Tons Per Year
Volatile Organic Compounds (VOC)	90
Total Hazardous Air Pollutants (HAPS)	90

40 CFR 63 Subpart WWWW was promulgated April 21, 2003; compliance is required by April 21, 2006.

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PART A: GENERAL PROVISIONS

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

I. PERMIT EXPIRATION AND RENEWAL [PCC 17.12.160.C.2 & PCC 17.12.180.A.1]

A. This permit is valid for a period of five years from the date of issuance of the permit.

B. The Permittee shall submit an application for renewal of this permit at least 6 months, but not greater than 18 months prior to the date of permit expiration.

II. COMPLIANCE WITH PERMIT CONDITIONS [PCC 17.12.180.A.8.a & b]

A. The Permittee shall comply with all conditions of this permit including all applicable requirements of Arizona air quality statutes and the air quality rules. Any permit noncompliance constitutes a violation of the Arizona Revised Statutes and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application. In addition, noncompliance with any federally enforceable requirement constitutes a violation of the Clean Air Act.

B. Need to halt or reduce activity not a defense. It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

III. PERMIT REVISION, REOPENING, REVOCATION AND REISSUANCE, OR TERMINATION FOR CAUSE [PCC 17.12.180.A.8.c & PCC 17.12.270]

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

B. The permit shall be reopened and revised under any of the following circumstances:

1. Additional applicable requirements under the Act become applicable to a major source. Such reopening shall only occur if there are three or more years remaining in the permit term. The reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to PCC 17.12.280. Any permit reopening required pursuant to this paragraph shall comply with provisions in PCC 17.12.280 for permit renewal and shall reset the five-year permit term.

2. Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the Class I permit.

3. The control officer or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

4. The control officer or the Administrator determines that the permit needs to be revised or revoked to assure compliance with the applicable requirements.

C. Proceedings to reopen and issue a permit, including appeal of any final action relating to a permit reopening, shall follow the same procedures as apply to initial permit issuance. Such reopenings shall be made as expeditiously as practicable. Permit reopenings for reasons other than those stated in paragraph III.B.1 of this Part shall not result in the resetting of the five-year permit term.

IV. POSTING OF PERMIT [PCC 17.12.080]

A. The Permittee who has been granted an individual permit by PDEQ or a general permit by ADEQ shall maintain a complete copy of the permit onsite. If it is not feasible to maintain a copy of the permit onsite, the permittee may request, in writing, to maintain a copy of the permit at an alternate location. Upon written approval by the Control Officer, the permittee must maintain a complete copy of the permit at the approved alternate location.

V. FEE PAYMENT [PCC 17.12.180.A.9 & PCC 17.12.510]

Permittee shall pay fees to the control officer pursuant to PCC 17.12.510.

VI. ANNUAL EMISSIONS INVENTORY QUESTIONNAIRE [PCC 17.12.320]

A. When requested by the control officer, the Permittee shall complete and submit an annual emissions inventory questionnaire. The questionnaire is due by March 31 or ninety days after the control officer makes the request and provides the inventory form each year, whichever occurs later, and shall include emission information for the previous calendar year.

B. The questionnaire shall be on a form provided by or approved by the control officer and shall include the information required by PCC 17.12.320.

VII. COMPLIANCE CERTIFICATION [PCC 17.12.180.A.5 & PCC 17.12.220.A.2]

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

A. The compliance certification shall include the following:

1. Identification of each term or condition contained in the permit including emission limitations, standards, or work practices that are the basis of the certification;

2. Identification of method(s) or other means used by the owner or operator for determining the compliance status of the source with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and

means required under the monitoring, related recordkeeping and reporting sections of this permit;

3. The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall identify each deviation and take it into account in the compliance certification; and

4. A progress report on all outstanding compliance schedules submitted pursuant to PCC 17.12.220.

B. A copy of all compliance certifications for Class I permits shall also be submitted to the EPA Administrator. The address for the EPA administrator is:

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

VIII. CERTIFICATION OF TRUTH, ACCURACY AND COMPLETENESS [PCC 17.12.220.A.3]

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

IX. INSPECTION AND ENTRY [PCC 17.12.220.A.4]

The Permittee shall allow the control officer or the authorized representative of the control officer upon presentation of proper credentials to:

A. Enter upon the Permittee's premises where a source is located or emissions-related activity is conducted, or where records are required to be kept under the conditions of the permit;

B. Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;

C. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;

D. Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements; and

E. Record any inspection by use of written, electronic, magnetic and photographic media.

X. PERMIT REVISION PURSUANT TO FEDERAL HAZARDOUS AIR POLLUTANT STANDARD [PCC 17.12.160.C.4]

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

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

A. Excess Emissions Reporting [PCC 17.12.040]

1. Excess emissions shall be reported as follows:

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

      i. Notification of facsimile within 24 hours of the time the permittee first learned of the occurrence of excess emission that includes all available information from 17.12.040.B. The number to call to report excess emissions is **520-740-3340.**

      ii. Detailed written notification by submission of an excess emissions report within 72 hours of the notification under subsection 2 above. **Send to PDEQ 150 W. Congress St., Tucson, Arizona 85701.**

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

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

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

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

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

      v. The nature and cause of the emissions;

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

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

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

B. Permit Deviations Reporting [PCC 17.12.180.A.5.b]

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

C. Emergency Provision [PCC 17.12.180.E]

1. An "Emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, that 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 emission attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.

2. An emergency constitutes an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the conditions of PCC 17.12.180.E.3 are met.

3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

   a. An emergency occurred and that the permittee can identify the cause or causes of the emergency;

   b. At the time of the emergency, the permitted facility was being properly operated;

   c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and

   d. The permittee submitted notice of the emergency to the control officer by certified mail or hand delivery within two working days of the time when emission limitations were exceeded due to the emergency. This notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective action taken

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

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

D. Compliance Schedule [ARS § 49-426.I.5]

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

E. Affirmative Defenses for Excess Emissions Due to Malfunctions, Startup, and Shutdown. [PCC 17.12.035]

1. Applicability

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

a. Promulgated pursuant to Sections 111 or 112 of the Act,

b. Promulgated pursuant to Titles IV or VI of the Clean Air Act,

c. Contained in any Prevention of Significant Deterioration (PSD) or New Source Review (NSR) permit issued by the U.S. E.P.A., or

d. Included in a permit to meet the requirements of PCC 17.16.590.A.5.

2. Affirmative Defense for Malfunctions

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

a. The excess emissions resulted from a sudden and unavoidable breakdown of process equipment or air pollution control equipment beyond the reasonable control of the operator;

b. The air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;

c. If repairs were required, the repairs were made in an expeditious fashion when the applicable emission limitations were being exceeded. Off-shift labor and overtime were utilized where practicable to ensure that the repairs were made as expeditiously as possible. If off-shift labor and overtime were not utilized, the owner or operator satisfactorily demonstrated that the measures were impracticable;

d. The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;

e. All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;

f. The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance;

g. During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in PCC Chapter 17.08 that could be attributed to the emitting source;

h. The excess emissions did not stem from any activity or event that could have been foreseen and avoided, or planned, and could not have been avoided by better operations and maintenance practices;

i. All emissions monitoring systems were kept in operation if at all practicable; and

j. The owner or operator's actions in response to the excess emissions were documented by contemporaneous records.

3. Affirmative Defense for Startup and Shutdown

a. Except as provided in XI.C.2 of this Part, and unless otherwise provided for in the applicable requirement, emissions in excess of an applicable emission limitation due to startup and shutdown shall constitute a violation. The owner or operator of a source with emissions in excess of an applicable emission limitation due to startup and shutdown has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the owner or operator of the source has complied with the reporting requirements of XIII.B of this Part and has demonstrated all of the following:

i. The excess emissions could not have been prevented through careful and prudent planning and design;

ii. If the excess emissions were the result of a bypass of control equipment, the bypass was unavoidable to prevent loss of life, personal injury, or severe damage to air pollution control equipment, production equipment, or other property;

iii. The source's air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;

iv. The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;

v. All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;

vi. During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in PCC Chapter 17.08 that could be attributed to the emitting source;

vii. All emissions monitoring systems were kept in operation if at all practicable; and

viii. The Permittee's actions in response to the excess emissions were documented by contemporaneous records.

b. If excess emissions occur due to a malfunction during routine startup and shutdown, then those instances shall be treated as other malfunctions subject to XI.B of this Part.

4. Affirmative Defense for Malfunctions During Scheduled Maintenance

If excess emissions occur due to a malfunction during scheduled maintenance, then those instances will be treated as other malfunctions subject to XI.B of this Part.

5. Demonstration of Reasonable and Practicable Measures

For an affirmative defense under XI.B or C of this Part, the owner or operator of the source shall demonstrate, through submission of the data and information required by XI.E.5 and XII.B of this Part, that all reasonable and practicable measures within the owner or operator's control were implemented to prevent the occurrence of the excess emissions.

XII. RECORDKEEPING REQUIREMENTS [PCC 17.12.180.A.4]

A. Permittee shall keep records of all required monitoring information including, where applicable, the following:

1. The date, place as defined in the permit, and time of sampling or measurements;

2. The date(s) analyses were performed;

3. The name of the company or entity that performed the analyses;

4. A description of the analytical techniques or methods used;

5. The results of such analyses; and

6. The operating conditions as existing at the time of sampling or measurement.

B. Permittee shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

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

XIII. REPORTING REQUIREMENTS [PCC 17.12.180.A.5.a]

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

A. Compliance certifications pursuant to VII of this Part.

B. Excess emission; permit deviation, and emergency reports in accordance with XI of this Part.

C. Performance test results in accordance with XVII.F of this Part.

D. Reporting requirements listed in Part B of this permit.

XIV. DUTY TO PROVIDE INFORMATION [PCC 17.12.160.G & PCC 17.12.180.A.8.e]

A. The Permittee shall furnish to the control officer, within a reasonable time, any information that the control officer may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the control officer copies of records required to be kept by the permit. For information claimed to be confidential, the Permittee, for Class I sources, shall furnish an additional copy of such records directly to the Administrator along with a claim of confidentiality.

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

XV. PERMIT AMENDMENT OR REVISION [PCC 17.12.245, PCC 17.12.255 & PCC 17.12.260]

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

A. Administrative Permit Amendment (PCC 17.12.245);

B. Minor Permit Revision (PCC 17.12.255);

C. Significant Permit Revision (PCC 17.12.260).

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

XVI. FACILITY CHANGES WITHOUT PERMIT REVISION [PCC 17.12.230]

A A facility with a Class I permit may make changes without a permit revision if all of the following apply:

1. The changes are not modifications under any provision of Title I of the ACT (Air Pollution Prevention and Control) or under A.R.S. 49-401.01(17);

2. The changes do not exceed the emissions allowable under the permit whether expressed therein as a rate of emissions or in terms of total emissions;

3. The changes do not violate any applicable requirements or trigger any additional applicable requirements;

4. The changes satisfy all requirements for a minor permit revision under PCC 17.12.255; and

5. The changes do not contravene federally enforceable permit terms and conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements.

B. The substitution of an item of process or pollution control equipment for an identical or substantially similar item of process or pollution control equipment shall qualify as a change that does not require a permit revision, if the substitution meets all of the requirements of XVI.A, D and E of this Part.

C. Except for sources with authority to operate under general permits, permitted sources may trade increases and decreases in emissions within the permitted facility, as established in the permit under 17.12.180.A.12 if an applicable implementation plan provides for the emissions trades, without applying for a permit revision and based on the seven working days notice prescribed in XVI.D of this Part. This provision is available if the permit does not provide for the emissions trading as a minor permit revision.

D. For each change under XVI.A through C of this Part, a written notice, by certified mail or hand delivery, shall be received by the control officer and the Administrator a minimum of seven (7) working days in advance of the change. Notifications of changes associated with emergency conditions, such as malfunctions necessitating the replacement of equipment, may be provided less than 7 working days in advance of the change but must be provided as far in advance of the change, or if advance notification is not practicable as soon after the change as possible.

E. Each notification shall include:

1. When the proposed change will occur;

2. A description of the change;

3. Any change in emissions of regulated air pollutants;

4. The pollutants emitted subject to the emissions trade, if any;

5. The provisions in the implementation plan that provide for the emissions trade with which the source will comply and any other information as may be required by the provisions in the implementation plan authorizing the trade;

6. If the emissions trading provisions of the implementation plan are invoked, then the permit requirements with which the source will comply; and

7. Any permit term or condition that is no longer applicable as a result of the change.

F. The permit shield described in PCC 17.12.310 shall not apply to any change made under XVI.A through C of this Part. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the implementation plan authorizing the emissions trade.

G. Except as otherwise provided for in the permit, making a change from one alternative operating scenario to another as proved under PCC 17.12.180.A.11 shall not require any prior notice under XVI this Part.

H. Notwithstanding any other part of this Section, the control officer may require a permit to be revised for any change that when considered together with any other changes submitted by the same source under this section over the term of the permit, do not satisfy XVI.A of this Part.

XVII. TESTING REQUIREMENTS [PCC 17.12.050]

A. Operational Conditions During Testing

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

B. Tests shall be conducted and data reduced in accordance with the test methods and procedures contained in the Arizona Testing Manual unless modified by the Control Officer pursuant to PCC 17.12.050.B.

C. Test Plan

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

D. Stack Sampling Facilities

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

1. Sampling ports adequate for test methods applicable to the facility;

2. Safe sampling platforms;

3. Safe access to sampling platforms; and

4. Utilities for sampling and testing equipment.

E. Interpretation of Final Results

Each performance test shall consist of three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard, the arithmetic means of results of the three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the three runs is required to be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the Permittee's control, compliance may, upon the Control Officer's approval, be determined using the arithmetic mean of the results of the other two runs. If the Control Officer or the Control Officer's designee is present, tests may only be stopped with the Control Officer's or such designee's approval. If the Control Officer or the Control Officer's designee is not present, tests may only be stopped for good cause. Good cause includes: forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the Permittee's control. Termination of any test

without good cause after the first run is commenced shall constitute a failure of the test. Supporting documentation, which demonstrates good cause, must be submitted.

F. Report of Final Test Results

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

XVIII. PROPERTY RIGHTS [PCC 17.12.180.A.8.d]

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

XIX. SEVERABILITY CLAUSE [PCC 17.12.180.A.7]

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

XX. PERMIT SHIELD [PCC 17.12.310]

Compliance with the conditions of this permit shall be deemed compliance with the applicable requirements identified in Part "C" of this permit. The permit shield shall not apply to any change made pursuant to Section XV.B of this Part and Section XVI of this Part.

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

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

Permit Number 2905
Inter-Fab, Inc.
3050 S. Alvernon Way
Tucson, Arizona 85713

Part B: SPECIFIC CONDITIONS

[All standards are federally enforceable unless otherwise noted]
[References are to Title 17 of the Pima County Code unless otherwise noted]

I. APPLICABILITY

This Part contains requirements that apply to the reinforced plastics composites production and surface coating activities conducted at the site. 40 CFR 63 Subpart WWWW – Reinforced Plastic Composites Production, Title 17 of the Pima County Code (PCC), Section 17.16.400.

A. This is a revision to the five-year Title V permit for a Class I source in response to a permit application dated May 19, 2004 and updated November 07, 2005. The permit was previously renewed in February 2002. In January 2006, the permit was updated and revised to include 40 CFR 63 Subpart WWWW which was promulgated on April 21, 2003. The compliance date is April 21, 2006. The permit was also revised to include a Closed Molding process that lessens the emissions from the facility.

B. Affected Emission Source or Process: This Part B contains specific operating requirements for the manufacture of a variety of items using reinforced plastic composites (fiberglass) and includes:

1. Reinforced Plastic Composites Production;
2. Adhesives; and
3. Surface Coating Operations.

The source does not have any centrifugal casting or continuous lamination/ casting operations (as defined in 40 CFR Subpart WWWW) and is a synthetic minor that emits less than 100 tpy of HAPS.

C. Affected Emission Source Classification: **Class I Major Source for HAPs, synthetic minor for VOCs and true minor for all other pollutants. The source has voluntarily elected to emit less than 100 tpy of HAPs to avoid certain requirements of the WWWW Mact.**

II. EMISSION LIMITS AND STANDARDS **[Federally Enforceable Conditions]**

A. Reinforced Plastic Composites Production

1. The Permittee shall not use more polyester resin and vinyl esters or gel-coat products, calculated as a 12-month rolling total, than listed in the following table: [PCC 17.12.190]
[Material Permit Condition]

Product Type	Maximum Pounds per 12-Month Period
Polyester Resins and Vinyl Esters	1,917,000
Gel Coats	543,000

2. The Permittee shall only use non-atomized spray to apply the polyester resin and vinyl esters. [PCC 17.12.190]**[Material Permit Condition]**

3. The Permittee shall not use any polyester resin or vinyl ester product containing more than 40 percent (40%) by weight of styrene. Additionally, no resin consumed on-site shall contain HAPs in excess of the values in the following table: [PCC 17.12.190 & 40 CFR 63.5810(d)(1) Table 7, #2] **[Material Permit Conditions]**

Operation	Resin Application Method	Maximum Organic HAP content (% by Weight)
All Operations	Open Molding Application Methods	35.0%
All Operations	Closed Molding Application Methods	40.0%

4. i. The Permittee shall not use any gel coat products containing more than 35 percent (35%) by weight of styrene (CAS Number 100425) nor more than 5 percent (5%) by weight of methyl methacrylate (CAS Number 80626). Additionally, no gel coat consumed on-site shall contain HAPs in excess of 40 percent (40%) maximum organic HAP content by weight. [PCC 17.12.190 & 40 CFR 63.5810(d) Table 3]**[Material Permit Conditions]**

ii. Of the 543,000 pounds of gelcoats allowed per 12-month period, no more than 418,110 pounds may be applied during the period using equipment that creates a liquid mist during application. [PCC 17.12.190]**[Material Permit Condition]**

5. Work Practice Standards **[Material Permit Conditions]**

a. The Permittee shall not use cleaning solvents that contain HAP or VOC except that styrene may be used as a cleaner in closed systems and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin. [40 CFR 63 Subpart WWWW, Table 4, #2]

b. The Permittee shall keep containers that store VOC and/or HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety. [40 CFR 63 Subpart WWWW, Table 4, #3]

c. The Permittee shall use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation. The Permittee shall close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding material or opening the cover for safety.[40 CFR 63 Subpart WWWW, Table 4, #6 & 7]

d. The Permittee shall not apply any gel coat products using mechanized spray equipment except as allowed in II.A.4.ii of Part B. [PCC 17.12.190]

6. The Permittee shall not conduct any filament winding, centrifugal casting, continuous lamination/casting, or pultrusion operations (as defined in Subpart WWWW). [PCC 17.12.190] **[Material Permit Condition]**

B. Adhesives **[Federally Enforceable Conditions]**

1. The Permittee shall not use greater than 6,000 gallons of any adhesive, calculated as a 12-month rolling total. For the purposes of this permit, adhesive is defined as an adhesive which contains greater than 60 percent methyl methacrylate monomer and less than 1 percent isopropanol, by weight. [PCC 17.12.190]

2. The Permittee shall not use greater than 600 gallons of any activator, calculated as a 12-month rolling total. For the purposes of this permit, activator is defined as a solution which contains dibutyl phthalate in a quantity of at least 10 percent and no greater than 20 percent, by weight. [PCC 17.12.190]

C. Surface Coating Operations

1. Material Use Limitation [PCC 17.12.190]**[Material Permit Conditions]**
[Federally Enforceable Conditions]

a. The Permittee shall not use greater than 2,400 gallons of paint products (excluding powder coatings and cleanup solvents), calculated as a 12-month rolling total.

b. The Permittee shall not allow the combined VOC and HAP content of any painting product, except cleanup solvents, to exceed 6.0 pounds per gallon. [PCC 17.12.190]

2. Operational Limitation

The Permittee shall not conduct any spray paint operation without minimizing organic solvent emissions. Such operations other than architectural coating and spot painting shall be conducted in an enclosed area equipped with controls containing no less than 96 percent of the overspray. [PCC 17.16.400.C.1]**[Material Permit Condition]**
[Locally Enforceable Condition]

3. Volatile Organic Compound (VOC) Limitation

The Permittee shall not transport or store VOCs without taking necessary and feasible measures to control evaporation, leakage and other discharge into the atmosphere. [PCC 17.16.400.A]

4. The Permittee shall not either: [PCC 17.16.400.C.2]**[Locally Enforceable Condition]**

a. Employ, apply, evaporate or dry any architectural coating containing photochemically reactive solvents for industrial or commercial purposes; or,

b. Thin or dilute any architectural coating with a photochemically reactive solvent.

c. For purposes of II.C.4.a of Part B, a photochemically reactive solvent shall be any solvent with an aggregate of more than 20 percent of its total volume composed of the chemical compounds classified in subparagraphs a through c of this paragraph, or which exceeds any of the following percentage composition limitations, referred to the total volume of solvent:

i. A combination of the following types of compounds having an olefinic or cyclo-olefinic type of unsaturation -- hydrocarbons, alcohols, aldehydes, esters, ethers, or ketones: five percent.

ii. A combination of aromatic compounds with eight or more carbon atoms to the molecule, except ethylbenzene: eight percent.

iii. A combination of ethylbenzene, ketones having branched hydrocarbon structures, trichloroethylene or toluene: 20 percent.

d. Whenever any organic solvent or any constituent of an organic solvent may be classified from its chemical structure into more than one of the groups of organic compounds described in II.C.4.a, b, or c of Part B it shall be considered to be a member of the group having the least allowable percent of the total volume of solvents.

D. All Operations

1. The Permittee shall keep containers that store VOC and/or HAP-containing materials closed or covered except during the addition or removal of materials. [PCC 17.16.400]
[Material Permit Condition]

2. Odor Limiting Standard

The Permittee shall not emit gaseous or odorous materials from equipment, operations, or premises under his control in such quantities as to cause air pollution. [PCC 17.16.030 & SIP 344]
[Federally Enforceable Condition]

3. Opacity Standards

The Permittee shall not cause or permit the effluent from a single emission point, multiple emission point, or fugitive emissions source to have an average optical density greater than 20%. [PCC 17.16.040 & SIP 321]
[Locally Enforceable Condition]

4. The Permittee shall not allow diffusion of visible emissions beyond the property boundary line within which the emissions become airborne without taking reasonably necessary precautions to control generation of airborne particulate matter. [PCC 17.16.050.D.1&2 & SIP 343]
[Federally Enforceable Condition]

5. Materials including solvents or other volatile compounds, paints, acids, alkalies, pesticides, fertilizers and manure shall be processed, stored, used and transported in such a manner and by such means that they will not evaporate, leak, escape or be otherwise discharged into the ambient air so as to cause or contribute to air pollution. Where means are available to reduce effectively the contribution to air pollution from evaporation, leakage or discharge, the installation and use of such control methods, devices, or equipment shall be mandatory.
[PCC 17.16.430.F]**[Locally Enforceable Condition]**

6. Where a stack, vent or other outlet is at such a level that fumes, gas mist, odor, smoke, vapor or any combination thereof constituting air pollution are discharged to adjoining property, the control officer may require the installation of abatement equipment or the alteration of such stack, vent or other outlet by the owner or operator thereof to a degree that will adequately dilute, reduce or eliminate the discharge of air pollution to adjoining property. [PCC 17.16.430.G]
[Locally Enforceable Condition]

III. MONITORING & RECORDKEEPING REQUIREMENTS [PCC 17.12.180.A.3 & A.4]

A. Reinforced Plastic Composites Production **[Federally Enforceable Conditions]**

1. In order to demonstrate compliance with the organic HAP limitations for resins and gel coats in II.A.3 & 4 of Part B, the Permittee shall maintain onsite information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS). The Permittee shall use the following procedures, as applicable: [40 CFR 63.5797]

   a. Include in the organic HAP total of each product all organic HAPs that are present at 0.1 percent by mass or more for Occupational Safety and Health Administration-defined carcinogens, as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other organic HAP compounds. [40 CFR 63.5797(a)]

   b. If the organic HAP content is provided by the material supplier or manufacturer as a range, you must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content, such as an analysis of the material by EPA Method 311 of appendix A to 40 CFR part 63, exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then you must use the measured organic HAP content to demonstrate compliance. [40 CFR 63.5797(b)]

   c. If the organic HAP content is provided as a single value, you may use that value to determine compliance. If a separate measurement of the total organic HAP content is made and is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then you still may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then you must use the measured organic HAP content to demonstrate compliance. [40 CFR 63.5797(c)]

   d. The Product information sheet must contain sufficient information to allow the Permittee to determine the weight or density of the product and the amount (in weight percent of total product) and chemical abstract service (CAS) number of each volatile organic compound and hazardous air pollutant contained in the product. [PCC 17.12.190]

2. The Permittee shall keep the following records:

   a. A copy of each notification and report that has been submitted to comply with this permit, including all documentation supporting any Initial Notification or Notification of Compliance Status that has been submitted, according to the requirements in §63.10(b)(2)(xiv). [40 CFR 63.5915(a)(1)]

   b. The records in §63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction. [40 CFR 63.5915(a)(2)]

   c. Records of performance tests, design, and performance evaluations (if required) as stipulated in §63.10(b)(2). [40 CFR 63.5915(a)(3)]

   d. All data, assumption, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in II.A.3 & 4 of Part B. [40 CFR 63.5915(c)]

   e. Within 30 days upon issuance of this permit and annually thereafter, a certified statement that the Permittee is in compliance with the work practice standards in II.A.5 of Part B. [40 CFR 63.5915(d)]

3. Format of Records [40 CFR 63.5920]

a. The Permittee shall maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection.

b. The Permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record.

c. The Permittee shall keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee may keep the records offsite for the remaining 3 years.

d. The Permittee may keep record in hard copy or computer readable form including, but not limited to, paper, microfilm, computer floppy disk, magnetic tape, or microfiche.

B. All Operations **[Locally Enforceable Conditions]**

1. The Permittee shall maintain on site a manufacturer's product information sheet (Material Safety Data Sheet or its equivalent) for each product used in the Permittee's process.

a. The product information sheet must contain sufficient information to allow the Permittee to determine the weight or density of the product and the amount (in weight percent of total product) and chemical abstract service (CAS) number of each volatile organic compound and hazardous air pollutant contained in the product.

b. Where the product information sheet contains content information of a product constituent in terms of a range of values (e.g., 40% to 60%), the Permittee shall assume the content of the constituent to be the highest value of the range.

2. Within ten working days of the beginning of each new calendar month, the Permittee shall monitor and record the following information:

a. The amount (pounds), the VOC content (percent by weight), and the HAP content (percent by weight) of polyester resins and vinyl esters used during the previous calendar month and the previous 12-consecutive month period in each the following operations:

i. Hand lay-up application.

ii. Spray application.

b. The amount (pounds), the VOC content (percent by weight), and the HAP content (percent by weight) of gel coats used during the previous calendar month and the previous 12-consecutive month period.

c. The amount (gallons), the VOC content (percent by weight), and the HAP content (percent by weight) of paint products (excluding powder coatings and cleanup solvents) used during the previous calendar month and the previous 12-consecutive month period.

d. The amount (gallons) of adhesive used during the previous calendar month as defined in II.B.1 of part B and the previous 12-consecutive month period.

e. The amount (gallons) of activator used during the previous calendar month as defined in II.B.2 of part B and the previous 12-consecutive month period.

3. Using the information recorded in III.B.2 of Part B, within ten working days of the beginning of each new calendar month, the Permittee shall calculate and record each of the following (in tons) for the previous month**:**

a. Total VOC and HAP emissions from each of the polyester resins and vinyl esters application operations:

i. Manually applied (hand layup).

ii. Mechanized atomized application.

b. Total VOC and HAP emissions from gel coat application operations.

c. Total VOC and HAP emissions from painting operations (excluding powder coatings and cleanup solvents).

d. Total VOC and HAP emissions from adhesives and activators used containing those constituents.

e. The total VOC and total HAP emissions from all operations in the previous 12-consecutive months. Rolling 12-month totals shall be calculated by taking the twelve most recent completed calendar months and adding the totals for each of those months. For the purposes of these calculations, the Permittee may use the following procedures:

i. Providing the Permittee is in compliance with II.A.1, 2, & 3 of Part B, the Permittee may assume that all polyester resins and vinyl esters used during the period had a styrene content of 35% by weight. In that case, the Permittee may use the following emission factors:

(A) For manual application (hand layup open-molding operations): 94 pounds of VOC and HAP emitted per ton of resin or ester processed.

(B) For mechanized non-atomized application: 77 pounds of VOC and HAP emitted per ton of resin or ester processed.

ii. Providing the Permittee is in compliance with II.A.1, 4, & 5.d of Part B, the Permittee may assume that all gel coats used during the period had a styrene content of 35% by weight and 5% by weight of methyl methacrylate. In that case, the Permittee may use the following emission factor: 336 pounds of VOC and HAP emitted per ton of gel coat processed for Infusion processes and 214 pounds of VOC and HAP emitted per ton of gel coat processed for open molding processes.

iii. Providing the Permittee is in compliance with II.C.1 of Part B, the Permittee may assume that all paint products applied had a combined VOC and HAP content of 6 pounds per gallon.

iv. Providing the Permittee is in compliance with II.B.1 & 2 of Part B, the Permittee may assume that all adhesives and activators applied had a combined VOC and

HAP content of 0.44 pounds per gallon of adhesive and 3.2 pounds per gallon of activator.

v. The Permittee's use of other emission factors is contingent upon approval, in advance of their use, by the EPA Administrator and the Control Officer.

4. At least once during each calendar month, the Permittee shall conduct and record the results of an on site inspection. The inspection shall be conducted while resins or gel coats are being applied and shall address the following items:

a. That the solvent used in any fiberglass cleanup operation contains no VOC or HAP constituents (except as provided in II.A.5.a of Part B).

b. That all resins used do not have a styrene or HAP content greater than the values allowed by II.A.3 of Part B.

c. That all gel coats used do not have a styrene, methyl methacrylate, or HAP content greater than the values allowed by II.A.4 of Part B.

d. That all paint products used contain no more than 6 pounds per gallon of VOC.

e. That all activators used contain no more than 20 percent dibutyl phthalate by weight.

f. That all storage vessels containing VOC or HAP are completely covered except as provided in II.A.5.b of Part B.

g. That covers on resin and gel coat mixers have no visible gaps except as provided in II.A.5.c of Part B.

h. That odors and visible emissions are not observed outside the production buildings. If visible emissions are observed, then the Permittee shall make arrangements to have an EPA Method 9 opacity test conducted by an individual currently certified in Method 9 procedures.

i. That architectural coatings used on site are not photochemically reactive.

j. That spray painting and coating operations are conducted within an enclosure.

k. Records of monthly inspections shall include, at minimum, the date of the inspection, the name and signature of the person conducting the inspection, the inspection results of each item checked (i.e., items III.B.4.a through j Part B) with discrepancies noted, results of any opacity tests conducted, and any corrective action taken.

5. The Permittee shall maintain a record of the particulate removal efficiencies of all paint booth dry particulate filters used.

IV. REPORTING REQUIREMENTS [PCC 17.12.180.A.5. & 17.12.210]

A. Reinforced Plastic Composites Production **[Federally Enforceable Conditions]**

1. Initial Compliance Report

By April 21, 2007 the Permittee shall demonstrate initial compliance with each organic HAP emissions standard contained in this Part with a notice of compliance status which includes detailed certified statements that conditions II.A.3 & 4 and II.A.5.a, b, & c of Part B have been and are being fully implemented. [40 CFR 63.5860 and Tables 8 & 9]

2. Notification of Compliance Status

For HAP related emission limits and standards, the Permittee shall submit to the control officer, not later than May 21, 2006, a Notification of Compliance Status signed by the responsible official who shall certify its accuracy, attesting to whether the source has complied with the relevant standard. The notification shall list: [40 CFR 63.9(h) & 63.5905.(a)]

a. The methods that were used to determine compliance;

b. The results of any performance test, continuous monitoring system (CMS), and/or other monitoring procedures or methods that were conducted;

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

d. The type and quantity or hazardous air pollutants emitted by the source (or surrogate pollutants if specified in the relevant standard), reported in units and averaging times in accordance with the test methods specified in the relevant standard;

e. A description of the air pollution control equipment (or method) for each emission point, including each control device (or method) for each hazardous air pollutant and the control efficiency (percent) for each control device (or method); and

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

3. If you change any information submitted in any notification, you must submit the changes in writing to the Administrator and the Control Officer within 15 calendar days after the change. [40 CFR 63.5905(b)]

B. Special Reporting for the Affected Source or Process **[Federally Enforceable Condition]**

Excess Emissions and Permit Deviations. The Permittee shall report to the Control Officer any emissions in excess of the limits (as defined in PCC 17.04.340.A) established by this Permit within 24 hours of the time the Permittee first learned of the excess emissions occurrence. The Permittee shall report other deviations from permit requirements within two working days of the time the Permittee first learned of the occurrence of the deviation. (See XI of Part A, for detailed information on these two reports). [PCC 17.28.065 & 17.12.040]

C. Semiannual Summary Reports of Required Monitoring. [PCC 17.12.180.A.5.a]
[Locally Enforceable Conditions]

1. The Permittee shall submit semiannual summary reports of the following monitoring and/or recordkeeping requirements:

a. The most recent complete 12-month rolling totals (in tons) of total VOC and total HAP emissions resulting from the use of polyester resins and vinyl esters in each of the following categories:

i. applied manually (hand lay up).

ii. applied with mechanized atomized spray.

b. The most recent complete 12-month rolling totals (in tons) of total VOC and total HAP emissions resulting from the use of gel coat applications.

c. The most recent complete 12-month rolling totals (in tons) of total VOC and total HAP emissions resulting from the use of VOC and HAP containing cleanup solvents.

d. The most recent complete 12-month rolling totals (in tons) of total VOC and total HAP emissions resulting from the use of adhesives and activators.

e. The most recent complete 12-month rolling totals (in tons) of total VOC and total HAP emissions resulting from all paint products applied.

f. A summary of the results of the monthly inspections conducted since the last semiannual report.

2. Summary reports shall be due by January 31st (covering the period July 1st through December 31st) and July 31st (covering the period January 1st through June 30th) of each year. The first summary report due after permit issuance may not cover a 6-month period. All instances of excess emissions and deviations from permit requirements as defined in XI of Part A, shall be clearly identified in such reports.

D. Compliance Certification Reporting:

The Permittee shall submit semiannual compliance certifications to the Control Officer. The Compliance Certification Reports are due by January 31st and July 31st of each year and shall cover the same periods as the semiannual summary reports (IV.C.2 of Part B). The first report due after permit issuance may not cover a 6-month period. (See VII of Part A, for detailed information on this report). [PCC 17.12.210.A.2]

1. The compliance certification shall include the following: **[Federally Enforceable Conditions]**

a. The Permittee shall include a statement in each compliance report that all resins and gel coats still meet the organic HAP limits in II.A.3 & 4 of this Part. If after the initial compliance report, the Permittee changes to a higher organic HAP resin or gel coat, or increases the resin or gel coat organic HAP content, or changes to a higher emitting resin or gel coat application method the Permittee shall demonstrate compliance with II.A.3 & 4, begin collecting resin and gel coat use records for a 12-month rolling average (in accordance with 40 CFR 63.5810.(a) through (c), if necessary), and/or submit the appropriate revision pursuant to Title 17 Chapter 12 of the Pima County Code.
[40 CFR 63.5895(d) & 40 CFR 5900(a)(2)]

b. A statement that there were no deviations during that reporting period if there were no deviations from any emission limitations (emission limit and operating limit opacity

limit, and visible emission limit) that apply and there were no deviations from the requirements for work practice standards in II.A.5.a, b, & c of this Part. [40 CFR 63.5910(a)]

c. If a deviation from any emission limit, operating limit, or work practice standard has occurred (including period of startup, shutdown, and malfunction) during the reporting period, the Permittee shall submit the following information: [40 CFR 63.5910(a)]

i. The total operating time of each affected source during the reporting period.

ii. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

d. The Permittee shall report if the source has met or exceeded the 100 tpy organic HAP emissions threshold. The Permittee shall include with this report any request for an exemption under 40 CFR 63.5805(e) as follows: [40 CFR 63.5910(f)]

i. The Permittee may at the same time request a one-time exemption from the requirements of 40 CFR 63.5805(b) or (d) in the compliance report if the Permittee can demonstrate all of the following: [40 CFR 63.5805(e)]

(A) The exceedance of the threshold was due to circumstances that will not be repeated.

(B) The average annual organic HAP emissions from the potentially affected operations for the last 3 years were below 100 tpy.

(C) Projected organic HAP emissions for the next calendar year are below 100 tpy, based on projected resin and gel coat use and the HAP emission factors calculated according to the procedures in this permit.

ii. If the source had received an exemption under 40 CFR 63.5805(e) and subsequently exceeds the 100 tpy organic HAP emissions threshold, the Permittee shall report this exceedance as required in 40 CFR 63.5805(f).

2. The following administrative information shall be included in each compliance certification: [40 CFR 63.5910(c)]

a. The company name and address.

b. A statement by a responsible official with that official's name, title, and signature, signifying the truth, accuracy, and completeness of the content of the report.

E. Emissions Inventory Reporting: [PCC 17.12.320]

[Locally Enforceable Condition]

The Permittee shall complete and submit an annual emissions inventory questionnaire when requested by the Control Officer. (See VI of Part A, for additional information on this report). [PCC 17.12.320]

V. TESTING REQUIREMENTS.

For purposes of District enforcement, these test methods shall be used, provided that for the purpose of establishing whether or not the facility has violated or is in violation of any provision of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable federal requirements if the appropriate performance or compliance procedures or methods had been performed. [A.R.S. §49-480.B]

A. EPA Test Method 9 shall be used to monitor compliance with the opacity standards in II.D.3 of Part B. [PCC 17.12.040.B]

B. If the Control Officer has reasonable cause to believe that a manufacturer's product information sheet referenced in III.A.1 and III.B.1 of Part B is deficient, the Control Officer may require the Permittee to conduct testing to confirm the validity of the information contained within the sheet in question. [PCC 17.20.010]

Permit Number 2905
Inter-Fab, Inc.
3050 S. Alvernon Way
Tucson, Arizona 85713

Attachment C: APPLICABLE REGULATIONS

REQUIREMENTS SPECIFICALLY IDENTIFIED AS APPLICABLE

Title 40 of the Code of Federal Regulations Part 63:

Subpart WWWW	National Emission Standards for Hazardous Pollutants: Reinforced Plastics Composites Production

State Implementation Plan, Pima County:

Rule 321	Emissions-Discharge: Opacity Limiting Standards and Applicability
Rule 343	Visibility Limiting Standard
Rule 344	Odor limiting Standard

Pima County Code (PCC) Title 17, Chapter 17.16:

17.16.030	Odor Limiting Standards
17.16.040	Standards and Applicability
17.16.050	Visibility Limiting Standard
17.16.400	Organic Solvents and Other Organic Materials
17.16.430	Unclassified Sources

Permit Number 2905
Inter-Fab, Inc.
3050 S. Alvernon Way
Tucson, Arizona 85713

Attachment D: EQUIPMENT/ PROCESSING AREA LIST

1. Powder Coating Oven

   Manufacturer; Industrial Process Equipment, Inc.
   Model; Russ Rumsey #1428.
   Manufactured; approx 1998.
   Maximum Capacity; 800,000 Btu

2. Powder Coating Spray Booth with two 18" stacks.

3. Three Rock Product Spray Booths with 36" stacks.

4. Diving Board Process/ City Pool Slide Area.

5. Pool Slides Process Area.

6. Gel Coat Booth (Alvernon Building).

7. Infusion Area (Closed molding) Alvernon Building.