

VALLEY PUMP & MACHINE WORKS, INC. - CASA GRANDE

1. Introduction 3

2. Authority to Construct..... 3

3. Emission Limitations and Controls3

 A. Applicable Limitations.....3

 B. Allowable Emissions.....3

 C. Minor Source Status - VOCs and HAPs4

 1. Annual Emission Cap4

 2. Consumable Use Limitation4

 D. Spray and Other Coating Operations4

 E. Surface Coating of Miscellaneous Metal Parts and Products.....4

 F. Particulate Matter Reasonable Precautions5

 G. Surface Stabilization5

4. Compliance Demonstration6

 A. NESHAP XXXXXX Compliance Requirements < 2,000 pounds welding rod usage6

 1. General Welding Requirements.....6

 B. NESHAP XXXXXX Compliance Requirements > 2,000 Pounds Welding Rod Usage.....7

 1. Tier 1 Compliance Requirements7

 2. Tier 2 Compliance Requirements8

 3. Tier 3 Compliance Requirements9

 C. Metal Fabrication and Finishing Area Source NESHAP, Recordkeeping Requirements9

 D. Regular Emissions Monitoring and Recordkeeping10

 1. Consumable Log.....10

 2. Non-instrumental Emissions Monitoring - Volatile Organic Compounds.....10

 3. Non-instrumental Emissions Monitoring - Hazardous Air Pollutants11

 E. Metal Fabrication and Finishing Area Source NESHAP, Reporting Requirements11

 F. Semi-annual Compliance Reporting11

 G. Annual Regular Compliance/Compliance Progress Certification11

5. Other Reporting Obligations.....12

 A. NESHAP Notification Requirement12

 B. Deviations from Permit Requirements.....12

 C. Annual Emissions Inventory12

6. Fee Payment12

7. General Conditions12

 A. Term.....12

 B. Basic Obligation.....12

 C. Duty to Supplement Application.....12

 D. Right to Enter.....13

 E. Transfer of Ownership13

 F. Posting of Permit.....13

 G. Permit Revocation for Cause13

 H. Certification of Truth, Accuracy, and Completeness13

 I. Permit Expiration and Renewal13

 J. Severability14

 K. Permit Shield.....14

 L. Permit Revisions14

M. Permit Re-opening 14

N. Record Retention 15

O. Scope of License Conferred 15

P. Excess Emission Reports; Emergency Provision 15

8. Equipment 16

9. Emission Inventory Table 16

1. Introduction

This permit pertains to a steel tank fabricator facility, operated by Valley Pump and Machine Works, Inc. an Arizona Corporation. The SIC Code is 3499 and the NAICS code is 332312. The facility is located at 738 West Boeing Drive, Casa Grande, Arizona, upon parcels also identified by Pinal County Assessor's Parcel Number 509-81-1090. The source is situated in an area classified as attainment for ozone.

Valley Pump manufactures water and oil storage tanks using galvanized steel sheets. Some tanks may be made from mild steel due to customer preferences or to specific UL listings for oil storage tanks. These tanks are then primed and painted using conventional spraying equipment.

This facility uses welding rod that contains Metal Fabrication Hazardous Air Pollutant (MFHAP), therefore National Emission Standards for Hazardous Area Source for Metal Fabrication and Finishing Sources Subpart XXXXXX is applicable to the facility.

The source includes spray painting equipment. **Since the paint consumed by the Permittee does not contain any target hazardous air pollutants, the National Emission Standards for Hazardous Air Pollutants, Subpart HHHHHH (Paint Stripping and Miscellaneous Surface Coating Operations) is not applicable to the facility.**

A complete list of equipment from which emissions are allowed by this permit is given in Section 8 of this permit. As an informational disclosure, emissions listed in the last section of this permit entitled "Emission Inventory Table" constitute good-faith estimates of emissions subject to regulation, as set forth in the application for permit.

Typical spray paint operations may give rise to emissions of organic material in the form of volatile organic compounds ("VOC[s]"). VOCs may also constitute either hazardous air pollutants ("HAP[s]") or photochemically reactive solvents ("PRS[s]"). The use of VOCs, HAPs and PRSs are all subject to different use-based regulatory thresholds. Exceeding those thresholds triggers a variety of differing regulatory obligations.

In order to legally assure compliance with the applicable requirements, while imposing a minimum of burden on the operator, this permit simply imposes an overall limit on the total use of all consumable material typically used in a spray paint operation.

In the absence of the limitations established in this permit, this source would have an uncontrolled potential to emit that could trigger the need for a permit subject to Title V of the Clean Air Act (1990) ("CAA"). However, at the source's request, this permit includes proposed "federally enforceable provision(s)" ("FEP"), designated pursuant to Code §3-1-084. That code section calls for an EPA-review of affected permit provisions. An EPA-concurrence in the practical enforceability of the provisions of this permit should provide both the source and the public with a maximum degree of assurance that the source does not require a "major source" permit under CAA Title V.

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

Emissions from this facility, specifically the equipment described in "Equipment Schedule" section below, and the operating configuration more fully described in the application for permit, already fall subject to the independent Federally Enforceable limitations identified elsewhere in this permit. Therefore, based on the regulations in effect upon the date of issuance of this permit and a finding that allowable emissions from the equipment described in the Equipment Schedule will neither cause nor contribute to a violation of any ambient air quality standard even without any additional limitations, and a further finding that this does not constitute a "major source" within the meaning of Code §3-3-203, this permit constitutes authority to construct and operate such equipment.

3. Emission Limitations and Controls

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

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

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

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

- C. Minor Source Status - VOCs and HAPs [Federally Enforceable, Provision, pursuant to Code §3-1-084 (8/11/94)]

1. Annual Emission Cap

a. VOC Emissions

Permittee shall limit the emissions of VOCs to less than 100 tons during any 12 month period.

b. HAP Emissions - Single Pollutant Emission Limitation

Permittee shall limit the emission of any single HAP to less than 10 tons during any 12 month period.

c. HAP Emissions - Combined Emission Limitation

Permittee shall limit the emissions of any combination of HAPs to less than 25 tons during any 12 month period.

2. Consumable Use Limitation

To minimize compliance burdens and still provide reasonable assurance of limiting VOC and HAPs emissions, Permittee shall limit the yearly consumption of all the paints, primers and solvents to not more than ~~1,245~~ 900 gallons. **This will result in potential VOC and HAP emissions totaling to approximately less than 3% of the 100 tons per year major source annual threshold for VOCs.**

3. Product Use Changes

Permittee may expand the forgoing list of consumables, to add other products which conform to the limitations of this permit regarding VOCs and VHAPs materials, by submitting Material Safety Data Sheets (MSDS) to the District for evaluation.

D. Spray **Paint** and Other **Surface** Coating Operations (Code §5-13-390)

1. Photochemically Reactive Solvents Disposal Limitation

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 above or of any material containing more than one and one-half gallons of any such photochemically reactive solvent by any means which will permit evaporation of such solvent in to the atmosphere.

2. To limit emissions of particulate matter (PM₁₀), no person shall conduct any spray paint operations without using an enclosed area (3 sided structure with walls a minimum of 8 feet high) designed to contain not less than 96% by weight of the over spray.

E. Surface Coating of Miscellaneous Metal Parts and Products (Code §5-24-1030.L)

No owner or operator of a facility engaged in the surface coating of miscellaneous metal parts and products may operate a coating application system that emits volatile organic compounds in excess of any of the following:

1. 4.3 pounds per gallon (0.5 kg/liter) of coating, excluding water, delivered to a coating applicator that applies clear coatings.
2. 3.5 lbs/gallon (0.42 kg/liter) of coating, excluding water, delivered to a coating applicator in a coating application system that is air dried or forced warm air dried at temperatures up to 194F (90C).
3. 3.5 lbs/gallon (0.42 kg/liter) of coating, excluding water, delivered to a coating applicator that applies extreme coatings.
4. 3.0 lbs/gallon (0.36 kg/liter) of coating, excluding water, delivered to a coating applicator for all other coatings and coting application systems.

F. **Particulate Emissions - Opacity Limits (Code §§2-8-300. and 4-2-040.)**

1. **SIP Limitation [Currently federally enforceable pursuant to PGAQCD Reg. 7-3-1.1 (6/16/80) approved as a SIP element at 47 F.R. 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 (ADEQ, 1992). Nothing in this limitation shall be interpreted to prevent the discharge or emission of uncontaminated aqueous steam, or uncombined water vapor, to the open air.

2. **Visibility Limiting Standard [Federally enforceable provision, pursuant to Code §2-8-300 (as amended 5/18/05) approved as a SIP element at 47 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 of 40 CFR 60, Appendix A.

- G. **Particulate Matter Reasonable Precautions** [*Currently federally enforceable pursuant to Code §4-2-040 (6/29/93) approved as a SIP element at 72 FR 41896 (8/1/07) and PGAQD Reg. 7-3-1.2 approved as a SIP element at 43 FR 53034 (11/15/78)*]
1. Permittee shall not cause, suffer, allow, or permit a building or its appurtenances, subdivision site, driveway, parking area, vacant lot or sales lot, or an urban or suburban open area to be constructed, used, altered, repaired, demolished, cleared, or leveled, or the earth to be moved or excavated, or fill dirt to be deposited, without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.
 2. Permittee shall not cause, suffer, allow, or permit a vacant lot, or an urban or suburban open area, to be driven over or used by motor vehicles, such as but not limited to all-terrain vehicles, trucks, cars, cycles, bikes, or buggies, without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.
 3. Permittee shall not disturb or remove soil or natural cover from any area without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.
 4. Permittee shall not crush, screen, handle or convey materials or cause, suffer, allow or permit material to be stacked, piled or otherwise stored without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.
 5. Stacking and reclaiming machinery utilized at storage piles shall be operated at all times with a minimum fall of material and in such a manner, or with the use of spray bars and wetting agents, as to prevent excessive amounts of particulate matter from becoming airborne. Other reasonable precautions shall be taken, as necessary, to effectively prevent fugitive dust from becoming airborne.
 6. Permittee shall not cause, suffer, allow or permit transportation of materials likely to give rise to fugitive dust without taking reasonable precautions to prevent fugitive dust from becoming airborne. Earth and other material that is tracked out or transported by trucking and earth moving equipment on paved streets shall be removed by the party or person responsible for such deposits.
 7. Permittee shall not cause, suffer, allow or permit the use, repair, construction or reconstruction of any road or alley without taking every reasonable precaution to effectively prevent fugitive dust from becoming airborne.
- H. **Surface Stabilization** [*Federally enforceable pursuant to Code §4-1-030 (10/28/15) approved as a SIP element at 82 FR 20267 (5/1/17)*]
1. Permittee shall not cause or allow visible fugitive dust emissions from open areas / vacant lots (areas not being utilized for an activity) to exceed 20% opacity based on EPA Method 9 or the continuous plume or intermittent plume methods listed in PCAQCD Code §4-9-340.
 2. Permittee shall erect barriers or no trespassing signs upon evidence of trespass on open areas / vacant lots.
 3. Permittee shall stabilize any open area / vacant lot greater than 1.0 acre that has 0.5 acre or more of disturbed surface and sign up for the Pinal County Dust Control forecast within 30 days of discovery. The open area / vacant lot shall be stabilized the day leading up to and the day that is forecast to be high risk for dust emissions.

4. Permittee shall not remove vegetation from open areas / vacant lots without applying dust suppressants before and during the weed abatement. Trackout onto paved surfaces must be prevented or eliminated and dust suppressants must be applied following weed abatement to stabilize the entire surface.
5. Stabilization of open areas / vacant lots is determined by the drop ball, threshold friction velocity, flat vegetation or standing vegetation methods listed in PCAQCD Code 4-9-320.
6. Permittee shall not cause or allow visible fugitive dust emissions from unpaved lots (areas being utilized for an activity) greater than 5000 square feet to exceed 20% opacity based on EPA Method 9 or the continuous plume or intermittent plume methods listed in PCAQCD Code §4-9-340.
7. Permittee shall not allow silt loading equal to or greater than 0.33 oz/ft² or allow the silt content to exceed 8% on unpaved lots greater than 5000 square feet.
8. Permittee shall stabilize unpaved lots greater than 5000 square feet by paving, applying a dust suppressant or graveling.
9. Permittee shall clean up trackout on a paved public roadway that exceeds 50 feet within 24 hours of discovery and limit opacity to 20% or less while using a rotary brush or broom.
10. Permittee shall make a record of the control measures applied.

I. General Maintenance Obligation [*Federally Enforceable Provision pursuant to code §3-1-081.E (9/5/01) approved as a SIP element at 66 FR 63166 (12/5/01)*] (Code 8-1-030.A.3)

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.

4. Compliance Demonstration

A. Compliance Requirements - Standards for Welding [*40 CFR Part 63, Subpart XXXXXX, Section §63.11516.(f)*]

Permittee shall follow the NESHAP requirements in Section §4.A.1 if the welding rod usage is less than 2,000 pounds (calculated on a rolling 12-month basis). Permittee shall follow the NESHAP requirements in Section §4.A.2 if the welding rod usage is more than 2,000 pounds (calculated on a rolling 12-month basis).

1. NESHAP XXXXXX Compliance Requirements < 2,000 pounds welding rod usage [*40 CFR Part 63, §63.11516.(f).(1) and (f).(2)*]

Permittee shall comply with the following welding requirements:

- a. Operate all equipment, capture and control devices associated with welding operations according to manufacturer's instructions. Compliance with this

requirement shall be demonstrated by maintaining a record of the manufacturer's specifications for the capture and control devices.

- b. One or more of the following management practices shall be utilized to minimize emissions of MFHAP:
 - i. Use welding processes with reduced fume generation capabilities (e.g., gas metal arc welding (GMAW) - also called metal inert gas welding (MIG));
 - ii. Use welding process variations (e.g. pulsed current GMAW), which can reduce fume generation rates;
 - iii. Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation;
 - ii. Optimize welding process variables (e.g. electrode diameter, voltage, amperage, welding angle, shield gas flow rate, travel speed) to reduce the amount of welding fume generated; and
 - iv. Use a welding fume capture and control system, operated according to the manufacturer's specifications.

2. NESHAP XXXXXX Compliance Requirements > 2,000 Pounds Welding Rod Usage [**40 CFR Part 63, §63.11516.(f).(3) through (8)**]

a. Tier 1 Compliance Requirements [**40 CFR Part 63, §63.11516.(f).(3)**]

Permittee shall conduct visual determinations of welding fugitive emissions at the primary vent, stack, exit or opening from the building containing the welding operations. These determinations shall be done according to the procedures of EPA Method 22 of 40 CFR part 60, Appendix A during normal operations. Tests shall be at least 15 minutes in duration, and visible emissions shall be considered to be present if they are detected for more than 6 minutes of the fifteen minute period. Records of all visual determinations of fugitive emissions along with any corrective action taken shall be kept.

i. Schedule of Tests:

These opacity tests shall be done according to the following schedule:

(A) Daily Method 22 Testing

Permittee shall begin conducting daily Method 22 fugitive emissions observations, on each day of operations.

(B) Weekly Method 22 Testing

If no visible fugitive emissions are observed for 10 consecutive testing days, permittee may decrease frequency of testing to once every calendar week, during operations. If visible fugitive emissions are observed during these tests, permittee shall resume daily observations.

(C) Monthly Method 22 Testing

If no visible emissions are observed for 4 consecutive weeks of tests, permittee may decrease frequency of testing to once per 21 days of operation of the process (one calendar month). If fugitive emissions are observed, permittee shall resume weekly observations.

(D) Quarterly Method 22 Testing

If no visible emissions are observed for 3 consecutive monthly EPA method 22 tests, permittee may decrease frequency of testing to once every 60 days of operation of the process (3 calendar months). If fugitive emissions are observed, permittee shall resume monthly observations.

ii. Corrective Action

(A) If visible fugitive emissions are detected during any visual determination as described above, permittee shall perform corrective actions to include, but not limited to, inspection of the welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented.

(B) After completing the corrective actions, permittee shall conduct a follow-up inspection for visible fugitive emissions following the same procedures as the initial one.

b. Tier 2 Compliance Requirements *[40 CFR Part 63, §63.11516.(f).(5)]*

If visible fugitive emissions are detected more than once during any consecutive 12 month period (notwithstanding the results of any follow-up inspections), permittee shall:

- i. Within 24 hours of the end of the visual determination of fugitive emissions in which visible fugitive emissions were detected, conduct a 30 minute visual determination of opacity in accordance with EPA Method 9, of 40 CFR Part 60, Appendix A during normal operations, at the primary vent, stack, exit or opening from the building containing the welding operations.
- ii. In lieu of conducting the Method 22 determinations of subsection C.1 of this section, Permittee shall conduct Method 9 observations as described in the previous subsection, according to the following schedule:

(A) Daily Testing

Conduct Method 9 tests once per day during operations.

(B) Weekly Testing

If the average of the six minute opacities recording during any of the daily consecutive Method 9 tests does not exceed 20% for 10 days of operation, the frequency of testing may be decreased to once per five days of consecutive operations. If opacity greater than 20% is observed during any of these tests, daily testing shall resume.

(C) Monthly Testing

If the average of the six minute opacities recording during any of the weekly consecutive Method 9 tests does not exceed 20% for 4 consecutive weekly tests, the frequency of testing may be decreased to once every 21 days of consecutive operations. If opacity greater than 20% is observed during any of these tests, weekly testing shall resume.

(D) Quarterly Testing

If the average of the six minute opacities recording during any of the monthly consecutive Method 9 tests does not exceed 20% for 3 consecutive monthly tests, the frequency of testing may be decreased to once every 120 days of consecutive operations. If opacity greater than 20% is observed during any of these tests, monthly testing shall resume.

(E) Return to Method 22

If after 2 consecutive months of testing, the average of the six minute opacities recorded during any of the monthly Method 9 tests does not exceed 20%, Permittee may resume EPA Method 9 testing as described in subsection C.1., or permittee may choose to continue conducting Method 9 tests in accordance with the schedule described in this subsection.

- iii. Permittee shall keep records of each visual determination of emissions along with any corrective action taken.
 - iv. If during any of the tests required by this subsection, 6-minute average opacities of 20% or less but more than 0% are observed, permittee shall take corrective actions, including inspections of all welding fume sources, and evaluation of proper operation and effectiveness of the management practices or fume control measures implemented.
- c. Tier 3 Compliance Requirements *[40 CFR Part 63, §63.11516.(f).(7)]*

If any of the Method 9 tests in the Tier 2 compliance requirements results in an exceedance of the 6-minute average of 20%, Permittee shall:

- i. Submit a report of exceedance of 20% opacity along with your semi-annual report and annual certifications.
- ii. Within 30 days of the opacity exceedance, prepare and implement a Site-Specific Welding Emissions Management Plan in accordance with 40 CFR §63.11517(f)(8), or if there's an existing Plan, prepare and implement a revised Plan.
- iii. During the preparation or revision of the Plan, continue to perform visual determinations of emissions, beginning on a daily schedule, using Method 9 at the primary vent, stack, exit or opening from the building containing the welding operations.
- iv. Maintain records of daily visual determinations performed during the preparation of the Site-Specific Welding Emissions Management Plan.

B. Recordkeeping Requirements - Metal Fabrication and Finishing Area Source NESHAP Subpart XXXXXX [40 CFR Part 63, §63.11518(c)]

1. Permittee shall collect and keep records of the following data and shall keep each record for 5 years and for 2 years on-site after the occurrence, measurement, corrective action, report or record:
 - a. Each notification and report submitted to comply with Subpart XXXXXX, and the documentation supporting each notification and report;
 - b. Records of the applicability determinations as in 40 CFR §63.11514(b)(5) listing equipment included in the affected source, as well as any changes to that and on what date they occurred..
 - c. For each visual determination of fugitive emissions, record the date and results, a description of any corrective action taken subsequent to the test and the date and results of any follow-up visual determination of fugitive emissions performed after the corrective actions.
 - d. For each visual determination of emissions opacity, record the date of each determination, the average of the 6-minute opacities measured by a test and a description of any corrective action taken.
 - e. Manufacturer's instructions.

C. Regular Emissions Monitoring and Recordkeeping [*Federally enforceable provision, pursuant to Code §3-1-084 (8/11/94)*]

To demonstrate continuing compliance with the emissions limitations established under this permit, Permittee shall:

1. Consumable Log
 - a. Permittee shall maintain a log listing of all consumables utilized in the subject operation, including a separate listing for each paint, coating or solvent that identifies each respective consumable product:
 - i. The product manufacturer
 - ii. The manufacturer's product identification number
 - iii. The relevant material data safety sheet ("MSDS") number and issue date
 - iv. The vendor
 - v. The density and volatile fraction of the product
 - vi. A copy of the MSDS sheet for each consumable product.
 - vii. A dated, signed statement, clearly stating whether any prime or finish coating product exceeds the VOC limitations defined above.

2. **Non-instrumental Emissions Monitoring - Volatile Organic Compounds [*Federally enforceable provision, pursuant to Code §3-1-084 (8/11/94)*]**

As a surrogate means of monitoring emissions of volatile organic compounds, Permittee shall maintain a logbook, updated at least monthly, clearly showing records of paint and solvent usage.

3. **Non-instrumental Emissions Monitoring - Hazardous Air Pollutants [*Federally enforceable provision, pursuant to Code §3-1-084 (8/11/94)*]**

As a surrogate means of monitoring emissions of hazardous air pollutants, Permittee shall maintain a logbook, updated at least monthly, clearly showing records of welding rod used.

- D. **Reporting Requirements - Metal Fabrication and Finishing Area Source NESHAP Subpart XXXXXX [*40 CFR Part §§63.11516(f) and 63.11519*]**

The semi-annual compliance reports required by §4.E below shall contain the following with respect to any observance of visible emissions during Method 22 or Method 9 testing as required by this NESHAP:

1. The date of every visual determination of fugitive emissions (Method 22) which resulted in detection of visual emission, a description of the corrective actions taken and the date and results of the follow-up visual determination of fugitive emissions.
2. The date of every opacity test (Method 9), the average of the six-minute opacities measured by the test, and a description of any corrective action taken subsequent to the test.
3. An exceedance report whenever the 6-minute average opacities recorded during a test exceeds 20%, including the date it occurred and the opacity recorded.
4. A copy of the records of daily opacity tests required by Tier 3 requirements, and a copy of the Site-Specific Welding Emissions Management Plan with any subsequent revisions to the Plan.

- E. **Semi-annual Compliance Reporting [*Federally enforceable provision, pursuant to Code §3-1-084 (8/11/94)*] (Code §3-1-083.A)**

Permittee shall submit a semi-annual report of emissions by submitting a copy of the "Total Product Use" section of the Consumable Log as may be required to reflect product use in the preceding calendar half. The report shall be submitted to the District within 30 days after the end of each calendar half. Appendix A is a form which may be used for the report.

- F. **Annual Regular Compliance/Compliance Progress Certification (Code §3-1-083.A., 11/3/93)**

Permittee shall annually submit a certification of compliance with the provisions of this permit. The certification shall:

1. Be signed by a responsible official, namely the proprietor, a general partner, the president, secretary, treasurer or vice-president of the corporation, or such other person as may be approved by the Control Officer as an administrative amendment to this permit;

2. Acknowledge that the product-use limitations under this permit constitute an emissions limitation;
3. Verify whether or not Permittee has complied with respect to the product use limitations under this permit;
4. Verify whether compliance with respect to each such term or condition has been continuous or intermittent;
5. Verify that the compliance certification is based upon records documenting compliance with the product use limitations under this permit; and
6. Be postmarked within thirty (30) days of the start of each calendar year.

5. Other Reporting Obligations

- A. NESHAP **Subpart HHHHHH (Paint Stripping and Miscellaneous Surface Coating Operations)** Notification Requirement [*Federally enforceable provision, pursuant to 40 CFR Part 63, §63.11175*]

Permittee shall notify the department if any spray application of coatings contain compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni) or cadmium (Cd) referred to as target hazardous air pollutants. A copy of the MSDS sheet shall be provided to the district for evaluation.

- B. Deviations from Permit Requirements (Code §3-1-81.A.5.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.

- C. Annual Emissions Inventory [Code §3-1-103. (Nov. '93)]

Permittee shall complete and submit to the District an annual emissions inventory, disclosing actual emissions for the preceding calendar year. Submittal of the form set forth in Appendix A of this permit by January 30th of each year fulfills this requirement.

6. Fee Payment (Code §3-7-600.)

As an essential obligation under this permit, a permit fee shall be assessed by the District and paid by Permittee in accord with the provisions of Code Chapter 3, Article 7, as they may exist at the time the fee is due. The permit fee shall be due annually on or before the anniversary date of the issuance of an individual permit, or formal grant of approval to operate under a general permit, or at such other time as may be designated now or hereafter by rule. The District will notify the Permittee of the amount to be due, as well as the specific date on which the fee is due.

7. General Conditions

- A. Term (Code §3-1-089)

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

B. Basic Obligation (Code §3-1-081.)

Permittee shall operate in compliance with all conditions of this permit, the Pinal County Air Quality Control District ("the District") Code of Regulations ("Code"), and 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 CAA.

C. Duty to Supplement Application (Code §§3-1-050.H., 3-1-081.A.8.e., 3-1-087.A.1.c., 3-1-110.)

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

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

Authorized representatives of the District shall, upon presentation of proper credentials and a showing that the District representative is equipped with certain safety equipment, namely a hard hat, be allowed:

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

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

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

F. Posting of Permit (Code §3-1-100)

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

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

The Director of the District ("Director") may revoke this permit for cause, which cause shall include occurrence of any of the following:

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

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

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

I. Permit Expiration and Renewal (Code §3-1-089)

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

J. Severability (Code §3-1-081.A.7)

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

K. Permit Shield (Code § 3-1-102.)

1. Compliance with the terms of this permit shall be deemed compliance with any applicable requirement identified in this permit.
2. 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.

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

1. This permit may be revised, reopened, revoked and reissued, or terminated for cause. Other than as expressly provided in Code Chapter 3, Article 2, the filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
2. The permittee shall furnish to the Control Officer, within a reasonable time, any information that the Control officer may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating the permit or to determine compliance with the permit.

3. Permit amendments, permit revisions, and changes made without a permit revision shall conform to the requirements in Article 2, Chapter 3, of the Code.
4. Should this source become subject to a standard promulgated by the Administrator pursuant to CAA §112(d), then 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. (Code §3-1-050.C.5)
5. Revision to Permit Provisions Designated as Federally Enforceable Pursuant to Code §3-1-084 [*Federally enforceable provision, pursuant to Code §3-1-084 (8/11/94)*]

As an express condition of preserving the federal enforceability of any provision of this permit designated "federally enforceable" pursuant to Code §3-1-084, Permittee shall not make any facility allowed change that would contravene such provision, until thirty (30) days after the Permittee has previously furnished notice of the proposed change to the District and to the Administrator, to thereby allow the Administrator opportunity to comment upon the continued "federal enforceability" of the subject provision after the proposed change.

M. Permit Re-opening (Code §3-1-087.)

1. This permit shall be reopened if either:
 - a. 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;
 - b. The Control Officer determines that it needs to be revised or revoked to assure compliance with the applicable requirements; or
 - c. The EPA makes a material objection to any of those federally enforceable designations under Code §3-1-084 after the normal EPA review period is ended.
2. If this permit must be reopened or revised, the District will notify the permittee in accord with Code §3-1-087.A.3.

N. Record Retention (Code §3-1-083.A.2.b)

Permittee shall retain for a period of five (5) years all documents required under this permit, including reports, monitoring data, support information, calibration and maintenance records, and all original recordings or physical records of required continuous monitoring instrumentation.

O. Scope of License Conferred (Code §3-1-081.)

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

P. Excess Emission Reports; Emergency Provision (Code §3-1-081.E, Code §8-1-030)

1. To the extent Permittee may wish to offer a showing in mitigation of any potential penalty, underlying upset events resulting in excess emissions shall reported as follows:
 - a. The permittee shall report to the Control Officer any emissions in excess of the limits established by this permit. Such report shall be in two parts:

- i. Notifications by telephone or facsimile within 24 hours or the next business day, whichever is later, of the time when the owner or operator first learned of the occurrence of excess emissions, including all available information required under subparagraph b. below.
 - ii. Detailed written notification within 3 working days of the initial occurrence containing the information required under subparagraph b. below.
- b. The excess emissions report shall contain the following information:
 - i. The identity of each stack or other emission point where the excess emissions occurred.
 - ii. The magnitude of the excess emissions expressed in the units of the applicable limitation.
 - iii. The time and duration or expected duration of the excess emissions.
 - iv. The identity of the equipment from which the excess emissions occurred.
 - v. The nature and cause of such emissions.
 - vi. If the excess emissions were the result of a malfunction, steps taken to remedy the malfunction and the steps taken or planned to prevent the recurrence of such malfunctions.
 - vii. The steps that were or are being taken to limit the excess emissions. To the extent this permit defines procedures governing operations during periods of start-up or malfunction, the report shall contain a list of steps taken to comply with this permit.
 - viii. To the extent excess emissions are continuous or recurring, the initial notification shall include an estimate of the time the excess emissions will continue. Continued excess emissions beyond the estimated date will require an additional notification.
- 2. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
- 3. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of the following subparagraph are met.
- 4. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. The permitted facility was at the time being properly operated;
- c. During the period of emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
- d. The permittee submitted notice of the emergency to the Control Officer by certified mail or hand delivery within 2 working days of the time when emissions limitations were exceeded due to emergency. The notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective action taken.

8. Equipment (Code §3-1-050.B)

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

- 1. Spray Paint Booth – 40’x20’x10’
- 2. Airless Spray Gun
- 3. Welding

9. Emission Inventory Table

ID	Source	Pollutants	Emission Rate (Tons/Yr.)
1	Spray Paint Booth	Volatile Organic Compounds (VOCs)	1.8
		Hazardous Air Pollutants (HAPs)	1.2 1.1
2	Welding	Hazardous Air Pollutants (HAPs)	0.5

Appendix A

Semi-annual Report

Permit ~~S13222.000~~ S13255.000

Abstract

This constitutes an annual report, documenting emissions and use of emission-generating materials during the subject reporting period.

Facility - Valley Pump and Machine Works, Inc.
738 West Boeing Drive
Casa Grande, AZ 85122

Reporting Period - January - June ____ or July - December ____ Year_____

Material Report

Total Amount of paint & solvents used - _____ gallons

Amount of welding rod/wire used - _____ pounds

Compliance Requirements

Were the NESHAP compliance requirements met as listed in Section §4.A.1 of this permit if the welding rod usage was less than 2,000 pounds (calculated on a rolling 12-month basis)?
Yes_____ No_____

Were the NESHAP compliance requirements met as listed in Section ~~§4.B~~ §4.A.2 of this permit if the welding rod usage was more than 2,000 pounds (calculated on a rolling 12-month basis)?
Yes_____ No_____ N/A_____

Were the NESHAP recordkeeping requirements met as listed in Section §4.B of this permit?
Yes_____ No_____

Were the regular recordkeeping and monitoring requirements met as listed in Section §4.C of this permit?
Yes_____ No_____

Were the NESHAP reporting requirements met as listed in Section §4.D of this permit?
Yes_____ No_____

Area Source NESHAPs Requirements

Were visual determinations of welding fugitive emissions conducted as required under Section §4.A.2 of this permit? (Attach records of the dates Method 22 and Method 9 tests were conducted, as well as results)
Yes_____ No_____

Did any Method 9 test exceed 20% opacity? Yes_____ No_____

If applicable, was a Site-Specific Welding Emissions Management Plan prepared? 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 _____

Email to - compliancereports@pinal.gov, or

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