

PRICE INDUSTRIES, INC. - CASA GRANDE

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1. Introduction

This permit pertains to a light sheet metal stamping and forming facility with assembly and painting of the finished products. The facility is operated by Price Industries, Inc. ~~a Georgia Corporation~~. The facility's SIC Codes are 3444, 3490 and 3585, ~~and the NAICS code is 332322~~. The facility is located at 999 North Thornton Road, Casa Grande, Arizona, upon a parcel also identified by Pinal County Assessor's Parcel #503-83-009A. The source is situated in an area classified as ~~non-attainment for all pollutants, except for~~ **particulate matter (PM₁₀)**.

The source transforms raw materials including galvanized steel and aluminum sheets and coils, and nichrome wire into air registers, grilles diffusers, dampers, turning vanes, electric duct heaters etc. These metals are ~~changed from their original~~ **formed** through various automatic and manual operations. ~~which~~ **These** include cutting, ~~or~~ **pressing**, and trimming of metal coils and sheets into a completed sized part, ~~and~~ **or** sawing of aluminum extrusion to length. Parts produced in the fabrication step are assembled by ~~means of various operations including~~ **that include** resistance spot welding, MIG welding, crimping, plastic latches etc.

Finished products ~~are then undergo one of the following~~ **are then undergo one of the following** ~~painting by means of one of two~~ coating processes:

- a. Powdercoating - Assembled parts are moved to the paint line overhead conveyor and ~~go through~~ a five stage wash process. The parts are then ~~dried in a~~ **proceed to a** dry-off oven to ~~prepare for~~ powder coating and ~~sent then moved to the~~ one of two powdercoating booths. ~~The~~ **Each** booth is 30' x 10' and is equipped with a filtering mechanism ~~that used to~~ **recovers** the excess powder ~~paint,~~ sends it to a feed hopper for recirculation and ~~mixes with virgin powder for~~ **and** reuse. The efficiency of the filtering system's ~~efficiency~~ **is** monitored with a manometer. The manometer indicates the particulate matter loading and ~~lifespan of the filter media.~~ **indicates the time to** change the filters. ~~After powdercoating~~ **Once powdercoated,** the parts are ~~carried~~ **transferred** to the bake oven. The ~~powder-bake oven "melts" together the power substrate~~ and ~~then further~~ polymerizes the ~~entire~~ surface into a 3 mil coating.
- b. Spray painting - Assembled parts are placed in **spray paint** booths equipped with filters. ~~The efficiency of the filtering system's efficiency is monitored with a manometer. The manometer indicates the particulate matter loading and indicates the time to change the filters.~~

The facility no longer uses the Safety-Kleen solvent and does not have any solvent cleaner operations on-site, as of this permit renewal, B31421.000. The Permittee has also changed from the IVC Industries water-based paint to Aquacron series paint.

Permit History

Permit Renewal B31083.000 (June 2013) authorized an additional spray coating booth equipped with filters, updated the consumable list to reflect a switch to water based spray coatings, removed conditions related to electroplating as this equipment has been removed, and incorporates the National Emission Standards for Hazardous Air Pollutants (NESHAP) Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, XXXXXX. Since the facility uses welding rods containing Metal Fabrication and Finishing Hazardous Air Pollutants (MFHAPs), and machines metals containing MFHAPs provisions of NESHAP, subpart XXXXXX apply.

Additionally, the incinerator testing timeline was amended to account for the older incinerator being out of service since August 2012. Since this incinerator was due for its five year performance test in December 2012 a provision was added to allow it to be tested within 60 days of achieving the capability to operate.

Permit History

Permit Renewal B30929.000 (March 2008) authorized an additional powder coating booth equipped with filter systems, a new bake-off 500,000 Btu/hour incinerator and a new solvent cleaning operation. The powder coating booth and incinerator will be subject to the requirements that are already included in the permit for other powder coating booths and incinerators.

With the issuance of permit B30929.000 (March 2008), the Permittee requested that their coating limitations be based on actual use of product, as opposed to square footage of parts coated. Due to the large diversity of products they coat, measuring each part is cumbersome. Square footage limitations have been converted into pound and gallon limits for the coatings while remaining below 50% of the major source threshold for VOCs. The use of the solvent in the approved solvent cleaner has been limited so that total VOC emissions from the facility do not exceed 50% of the major source threshold.

Permit B30929.000 (March 2008) also removed the loading limitation of 10 lbs/hour of combustible material in the incinerator. This limitation is an intrinsic limitation to the piece of equipment, and in no way limits the potential emissions of the incinerator. Due to the different sizes of hangers and different amounts of powder coatings applied to them, maintaining records of the weight of the charges is practically infeasible. Instead, the incinerators will be allowed to be filled to capacity, since the performance test will be conducted at that capacity, and potential emissions of PM₁₀, NO_x, and CO will remain below major source thresholds at full capacity.

Permit Revision B30755.R02 (August 2007) authorized the installation of a new 3-sided spray paint booth. In this booth, an enamel will be sprayed onto metal parts. Emissions from this additional booth could potentially exceed the major source threshold for VOCs and/or HAPs, therefore, a limitation on the use of the enamel was included in the permit. With this limitation, emissions from the use of the enamel will not exceed 1 tpy. The only solvent used in this booth will be acetone, for cleaning the spray guns. The current requirements in this permit regarding paint booths, apply to this additional booth. This revision also incorporated Code §5-24-1030.L, an applicable requirement previously missing from this permit, and allowed the use of 2 new powder coatings for the existing powder coating booth. The addition of the powder coatings does not increase VOC or HAP emissions from the facility.

The requirements of §5-12-370, Architectural Coatings, were removed from this permit, since there are no architectural coatings conducted at this facility, and the photochemically reactive solvent (PRS) limitations of Article 9 do not apply to this area of Pinal County.

Revision B30755.R02 (August 2007), did not trigger the newly adopted HAPs rule, since the application was received before the effective date of July 1, 2007.

Permit Revision B30755.R01 (April 2004) authorized the source to install a natural gas operated incinerator with an afterburner chamber. The furnace was designed to remove limited amounts of cured paint coatings from metal parts using heat. High temperatures thermally decompose the paint residues, varnish, epoxy etc. to smoke and other volatile gases. The smoke and other gases created by vaporization of the paint coatings are drawn through an afterburner operating at 1400°F-1600°F. These gases are completely burned inside the afterburner. The hot stack gases discharged to the atmosphere consist primarily of water vapor and carbon dioxide.

In accordance with manufacturer's information on the incinerator, the capacity of the cleaning furnace was limited to processing a maximum of ten (10) pounds per hour of combustible material, using a maximum combustion energy input of 500,000 Btu/Hr.

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 hazardous air pollutants ("HAP[s]"). The use of VOCs

or HAPs are subject to different emission-based regulatory thresholds. Exceeding those thresholds could trigger a variety of additional regulatory obligations.

The original application indicates that the permittee coats metal products with four different kinds of powder paints, five different kinds of electro-coat paints and two kinds of top coatings.

Conceivably, this facility could eventually reach production levels where corresponding emissions of VOCs exceeded the 100 tpy "major source" threshold. In order to assure that the facility does not inadvertently become a "major source" of VOC emissions, this permit closely defines allowable consumable materials, and corresponding rates of consumption. At the time of the original application, the applicant anticipates an initial start-up configuration, and ultimately operating in one of three possible long-term operating scenarios. The original permit correspondingly provided¹ for a "start-up mode," and allowed the permittee to invoke any one of three "operating modes."

A complete list of equipment from which emissions are allowed by this permit is given in ~~the next to last~~ 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 anticipated actual levels of emissions, as set forth in the application for permit. That "emission inventory table" does not itself establish enforceable limitations.

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"). At the source's request, this permit includes proposed "federally enforceable provision(s)" ("FEP"), designated pursuant to Code §3-1-084.

2. Authority to Construct

A. Generally [*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)*]

As an exercise of authority under PCAQCD's SIP-approved minor new source review program, this permit or permit revision authorizes the construction of the equipment enumerated in the "Equipment Schedule" below. Emissions from this facility, specifically the emissions from the equipment described in the Equipment Schedule, and the operating configuration more fully described in the application for permit, fall subject to the enforceable limitations set forth either below or 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 additional limitations, and a further finding that in view of this permit this does not constitute a "major emitting source" within the meaning of Code §3-3-203, this permit constitutes authority to construct and operate such equipment.

B. Minor New Source Review Requirements [*Code §§3-1-010, 3-1-040 (as amended 10/12/95) approved as a SIP element at 61 FR 15717 (4/9/96)*]; Voluntarily Accepted Federally Enforceable Emissions Limitations [*Code §3-1-084, approved as a SIP element at 61 FR 15717 (4/9/96)*]; Material Permit Condition (Code §3-1-109)

Recognizing that the predominant potential emissions from this facility consist of VOCs, recognizing that elements of this permit impose emission limitations on VOCs, and further

¹The "start-up mode" requirements have been taken out of the permit, since this facility has been in production for several years.

recognizing that VOCs are not directly subject to an ambient standard, this permit does not impose any additional "minor NSR" emission limitations on this facility.

- C. Minor New Source Review Requirements - Equipment Authorized [*Code §§3-1-010, 3-1-040 (as amended 10/12/95) approved as a SIP element at 61 FR 15717 (4/9/96)*]; Voluntarily Accepted Federally Enforceable Emissions Limitations [*Code §3-1-084, approved as a SIP element at 61 FR 15717 (4/9/96)*]; Material Permit Condition (Code §3-1-109)

All of the equipment listed under §8.A of this permit.

1. ~~Natural gas operated incinerator with an after burner as identified in §8.A.5 of the permit revision B30755.R01.~~
2. ~~3 sided spray coating bench booth with filters as identified in §8.A.5 of permit revision B30755.R02~~
3. ~~Natural gas operated incinerator with afterburner as identified in the Equipment Schedule of B30929.000.~~
4. ~~A 30' x 10' Powder coating booth as identified in the Equipment Schedule of B30929.000.~~
5. ~~A solvent cleaning unit as identified in the Equipment Schedule of B30929.000.~~
6. ~~3 sided spray coating bench booth with filters as identified in §8.A.5 of permit renewal B31083.000~~

- D. Minor New Source Review Requirements - Control Requirements [*Code §§3-1-010, 3-1-040 (as amended 10/12/95) approved as a SIP element at 61 FR 15717 (4/9/96)*]; Voluntarily Accepted Federally Enforceable Emissions Limitations [*Code §3-1-084, approved as a SIP element at 61 FR 15717 (4/9/96)*]; Material Permit Condition (Code §3-1-109)

1. ~~The primary chamber of the original incinerator shall be operated at a temperature between 700°F to 800°F (degrees Fahrenheit) and the afterburner shall be operated at a temperature between 400°F - 1600°F. This temperature operating conditions will ensure that the incinerator is operating at a control efficiency of 99% or more.~~
2. The primary chamber of the ~~second~~ incinerator ~~approved with renewal B30929.000~~ shall be operated at a temperature between 600°F to 900°F (degrees Fahrenheit) and the afterburner shall be operated at a temperature between 1500°F - 1650°F.
3. ~~Both~~ **The** incinerator shall be equipped with an exhaust temperature monitor that shuts down the primary chamber when the secondary chamber is not in operation.
4. The 30' x 10' powder coating booths shall be equipped with a ~~least 98% particulate capturing~~ filtration system **which limits potential emissions by at least 98%.**

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 Emission Limitations - VOC's and HAP's [*Federally Enforceable Provision, pursuant to Code §3-1-084 (8/11/94)*]

1. ~~Material Permit Condition (Code §3-1-109)~~

~~Within the meaning of Code §3-1-109, all emission limitations pertaining to establishment of and compliance with an emission cap shall constitute material permit conditions.~~

1. Annual Emission Cap [~~*Federally Enforceable Provision, pursuant to Code §3-1-084 (8/11/94)*~~]

a. VOC Emissions

Permittee shall limit the emissions of VOC's to less than 100 tons during any ~~twelve~~ (12) month period

b. HAP Emissions - Single Compound Limitation

Permittee shall limit the emissions of any single HAP to less than ~~ten~~ (10) tons during any ~~twelve~~ (12) month period.

c. HAP Emissions - Combined Emission Limitation

Permittee shall limit the emissions of any combination of HAP's to less than ~~twenty-five~~ (25) tons during any ~~twelve~~ (12) month period.

2. Powdercoating and Spray Coating Product Formulation and Use Limitations (Code §§3-1-084, 3-7-600)

~~a. Other than "exempt consumable materials" as defined below, Permittee shall limit the use of the coatings ("Consumables"), which contain VOCs and/or HAPs. For the purpose of fee calculation, the product limitations and controls required by this permit will limit the potential emissions of volatile organic compounds to below ~~fifty~~ percent (50%) of the major source trigger.~~

b. ~~Operating Configuration~~

Permittee is allowed to use any combination of consumables as listed in the table below, provided the corresponding maximum use does not exceed the limits provided in the table.

Product	Vendor	Maximum Use
Powder Coating with 0.1% VOC content or less	Vitracoat	3,000,000 800,000 lbs./yr.
Price Industries Black Water-Based Paint	IVC Aquacron Industrial Coatings	30,000 gal/yr.
Safety Kleen Premium Solvent	Safety Clean	3,000 gal/yr.

3. Consumable List Expansion

Permittee may expand the foregoing list of consumables to add other products which conform to the limitations of this permit regarding VOCs and HAPs materials. **The Permittee must** submitting Material Safety Data Sheets (MSDS) to the district for evaluation at least **fourteen (14)** days in advance of the **new** product being used.

4. Facility-wide Emissions

The limitations specified in this section will limit the annual VOC emission to approximately 48 tons, or forty-eight percent (48%) of the 100 ton VOC major source threshold.

D. Spray paint and other Surface Coating Operations **[Currently federally enforceable pursuant to PGAQCD Reg. 7-3-3.4 (6/16/80) approved as a SIP element at 47 FR 15579 (4/12/82)]** (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 in §5-12-370 or of any material containing more than one and one-half gallons of any such photochemically reactive solvent by any means which will permit the evaporation of such solvent into the atmosphere.

2. To limit emissions of particulate matter ("PM₁₀"), no person shall conduct any spray paint operations ~~using~~ **utilizing** 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 overspray. **For purposes of this rule, an enclosed area means a three (3) sided structure with walls a minimum of eight (8) feet high.**

3. To conform to the foregoing overspray capture and control requirement, Permittee shall:

a. Powder coat in 30' x 10' booths equipped with at least 98% particulate (powder) capturing filtration system.

- b. Top coat and manually paint in a spray booth equipped with at least 98% reduction efficiency arrestor pads (filters).
- c. Equip all paint booths with a manometer to measure pressure drop across the filter media. For the automatic booth, the filters shall be changed after the pressure drop reaches 6 inches of water. For the manual booth using liquid paints the filters shall be changed after the pressure drop reaches 0.5 inches of water. In either case the pressure drop shall not be allowed to exceed 110% of the rated pressure drop.

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

Permittee shall not apply coatings on metal parts and products that exceed the following limits:

- 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 coating application systems.

~~F. Standards for Maintenance Solvent Cleaning Operation (Code §§5-15-620)~~

~~1. The solvent cleaner shall be equipped with the following:~~

- ~~a. A leak free container for the solvents and the articles being cleaned.~~
- ~~b. An apparatus or non porous cover which prevents the solvent from evaporating when not processing work in the degreaser.~~
- ~~c. A facility for draining cleaned parts such that the drained solvent is returned to the container.~~
- ~~d. A permanent, conspicuous label which summarizes operating requirements contained in the following subsection 2.~~

~~2. Operating Requirements~~

~~Permittee shall:~~

- ~~a. Operate and maintain the solvent cleaner equipment in proper working order.~~
- ~~b. Do not allow any solvent to leak from any portion of the solvent cleaner.~~
- ~~c. All solvent storage, including the storage of waste solvent and waste solvent residues, shall at all times be in closed containers which are legibly labeled with their contents.~~

- ~~d. Do not dispose of any solvent, including waste solvent, in such a manner as to cause or allow its evaporation into the atmosphere. Records of its disposal/recovery shall be kept in accordance with hazardous waste disposal statutes.~~
- ~~e. Do not remove any device designed to cover the solvent unless processing work in or performing maintenance on the solvent cleaner.~~
- ~~f. Drain cleaned parts for at least 15 seconds after cleaning or until dripping ceases.~~
- ~~g. If using a solvent spray system, use only a continuous, undivided stream (not a fine, atomized or shower type spray) at a pressure which does not exceed 10 psig or cause liquid solvent to splash outside of the solvent container.~~
- ~~h. Perform solvent agitation, when necessary, through pump recirculation or by means of a mixer.~~
- ~~i. Do not place porous or absorbent materials such as cloth, leather, wood or rope in or on the solvent cleaner.~~

F. Standard of Performance for Incinerators (Code §5-3-100.A & D)

1. No person shall cause, allow or permit to be emitted into the atmosphere, from any type of incinerator, smoke, fumes, gases, particulate matter or other gas-borne material which exceeds 20 percent opacity for more than 30 seconds in a 60 minute period.
2. No person shall cause, allow or permit the discharge into the atmosphere in any one hour from multiple chamber incinerators, controlled atmosphere incinerators, fume incinerators, afterburners particulate matter emissions in excess of 0.1 grain per cubic foot, based on dry flue gas at standard conditions, corrected to 12 percent carbon dioxide.
3. Incinerators are exempt from the opacity and emission requirements listed in **subsections 1 and 2** above for not more than 30 seconds in any 60-minute period.
4. Permittee shall record daily charges and hours of operation for each incinerator.

G. Metal Fabrication and Finishing Standards for Machining – **NESHAP Subpart XXXXXX**
[Federally Enforceable pursuant to 40 CFR Subpart 63.11516.b]

1. For each machining operation that involves a material containing one or more MFHAPs, the permittee must:
 - a. Take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as **practicable; and**
 - b. Operate all equipment associated with machining according to manufacturer's instructions.
 - ~~c. Machining means dry metal turning, milling, drilling, boring, tapping, planing, broaching, sawing, cutting, shaving, shearing, threading, reaming, shaping,~~

~~slotting, hobbing, and chamfering with machines (excludes hand held devices and any process employing fluids).~~

b. ~~Material containing MFHAP means any material that contains cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal) and contains manganese in amounts greater than or equal to 1.0 percent by weight (as the metal) as shown on the manufacturer's MSDS.~~

2. For the purposes of this permit, machining means dry metal turning, milling, drilling, boring, tapping, planing, broaching, sawing, cutting, shaving, shearing, threading, reaming, shaping, slotting, hobbing, and chamfering with machines.
 - a. Shearing operations cut materials into a desired shape and size, while forming operations bend or conform materials into specific shapes.
 - b. Cutting and shearing operations include punching, piercing, blanking, cutoff, parting, shearing and trimming.
 - c. Forming operations include bending, forming, extruding, drawing, rolling, spinning, coining and forging the metal.
3. Material containing MFHAP means any material that contains cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal) and contains manganese in amounts greater than or equal to 1.0 percent by weight (as the metal) as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet (MSDS) for the material.

H. Metal Fabrication and Finishing Standards for Welding – NESHAP Subpart XXXXXX [*Federally Enforceable pursuant to 40 CFR Subpart 63.11516.f*]

1. Welding rod containing MFHAP means a welding rod that contains cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal) or contains manganese in amounts greater than or equal to 1.0 percent by weight (as the metal) as shown on the manufacturer's MSDS.
2. For each welding operation that uses materials that contain MFHAP permittee must:
 - a. Operate all equipment, capture, and control devices with associated with welding operations according to manufacturer's instructions.
 - b. Implement one or more of the following management practices in order to minimize emissions of MSHAP, as practicable, while maintaining the required welding quality through the application of sound engineering judgement.
 - 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 fume generation;

- iv. 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
 - v. Use a welding fume capture and control system, operated according to the manufacturer's specifications.
3. ~~If the facility uses 2000 pounds or more per year of welding rod containing one or more MFHAP (calculated on a rolling 12 month basis) permittee must additionally implement the following for each welding operation that uses materials that contain MFHAP.~~

a. ~~Tier 1 compliance requirements~~

~~Permittee shall perform visual determinations of welding fugitive emissions at the primary vent, stack, exit, or opening from the building containing the welding operations. These determinations must be performed according to EPA Method 22 of 40 CFR Part 60, Appendix A 7, during normal operations. These observations shall be at least 15 minutes in duration and visible emissions shall be considered present if they are detected for more than 6 minutes of the 15 minute period.~~

~~These opacity test shall be done according to the following schedule:~~

i. ~~Daily Observations~~

~~Within 30 days of welding rod usage exceeding 2000 pounds (calculated on a rolling 12 month basis) the permittee shall begin conducting Method 22 fugitive emission observations once per day, on each day of operations.~~

ii. ~~Weekly Observations~~

~~If no visible fugitive emissions are observed for 10 consecutive testing days, permittee may decrease the frequency of testing to once every five days of operation (one calendar week). If visible fugitive emissions are observed during these tests, Permittee shall resume daily observations.~~

iii. ~~Monthly Observations~~

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

iv. ~~Quarterly Observations~~

~~If no visible emissions are observed for 3 consecutive monthly tests, permittee may decrease frequency of testing to once every 60 operating days (3 calendar months). If fugitive emissions are observed, Permittee shall resume monthly observations.~~

v. ~~Corrective Action~~

~~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.~~

~~After completing the corrective actions, permittee shall conduct a follow up inspection for visible fugitive emissions via Method 22 at the primary vent, stack, exit, or opening from the building containing the welding operations.~~

vi. ~~Recordkeeping and Reporting~~

~~Permittee shall keep records of each visual determination of emissions along with any corrective action taken.~~

~~Permittee shall report all instances where visible emissions were detected along with any corrective action taken and the results of subsequent follow up inspections for visible emissions and submit along with the semi annual report and annual certifications.~~

b. ~~Tier 2 Compliance Requirements~~

~~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:~~

~~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 4 during normal operations, at the primary vent, stack, exit or opening from the building containing the welding operations.~~

~~In lieu of conducting the Method 22 determinations as described above in Tier 1 Compliance Requirements, Permittee shall conduct Method 9 observations according to the following schedule:~~

i. ~~Daily testing~~

~~Conduct Method 9 tests once per day during operations.~~

ii. ~~Weekly testing~~

~~If the average of the six minute opacities recorded 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.~~

iii. ~~Monthly testing~~

~~If the average of the six minute opacities recorded 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 operations. If opacity greater than 20% is observed during any of these tests, weekly testing shall resume.~~

iv. ~~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 operations. If opacity greater than 20% is observed during any of these tests, once every 21 days of operation testing shall resume.~~

v. ~~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 22 testing once every 21 days of operation as described above in Tier 1 Compliance Requirements, or permittee may choose to continue conducting Method 9 tests in accordance with the quarterly testing schedule.~~

vi. ~~Recordkeeping and Reporting~~

~~Permittee shall keep records of each visual determination of emissions along with any corrective action taken.~~

~~Permittee shall report the results of all visual determinations of opacity along with any corrective action taken and submit along with the semi-annual report and annual certifications.~~

vii. ~~Corrective Actions~~

~~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.~~

e. ~~Tier 3 Compliance Requirements~~

~~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 as described below in Section 3.H.3.d of this permit, 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 Method 9 visual determinations of emissions as described above in Tier 2 compliance requirements, beginning on a daily schedule, 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 and submit along with your semi-annual report and annual certifications.~~
 - v. ~~Include the daily Method 9 records along with your semi-annual report and annual certifications.~~
- d. ~~Site Specific Welding Emissions Management Plan~~
- ~~The Site Specific Welding Emissions Management Plan must include:~~
- i. ~~Company name and address;~~
 - ii. ~~A list and description of all welding operations which currently comprise the welding affected source;~~
 - iii. ~~A description of all management practices and/or fume control methods in place at the time of the opacity exceedance;~~
 - iv. ~~A list and description of all management practices and/or fume control methods currently employed for the welding affected source;~~
 - v. ~~A description of additional management practices and/or fume control methods to be implemented and the projected date of implementation;~~
 - vi. ~~Any revisions to the plan must contain copies of all previous plan entries;~~
 - vii. ~~The plan must be updated annually and submitted with your semi-annual report and annual certifications.~~
 - viii. ~~The plan must be available for inspector review.~~

I. Fuel-Burning Equipment Emission Limitations – Particulate Matter [*Currently federally enforceable pursuant to PGCAQCD Reg. 7-3-1.7 (3/31/75) approved as a SIP Element at 43 FR 50531 (11/15/78)*] (Code §3-1-081.)

- 1. For the purpose of this section, the heat input shall be the aggregate heat content of all fuel whose products of combustions pass through as stack or other outlet. The heat input value shall be the equipment manufacturer or designer's guaranteed maximum input, whichever is greater. The total heat input of all fuel-burning units on premises shall be used for determining the maximum allowable amount of particulate matter which may be emitted.

2. Permittee shall not cause or allow the emission of particulate matter, caused by combustion of fuel, in excess of the amounts calculated by the following equation:

For equipment with a heat input capacity of less than 4,200 million Btu per hour, particulate emissions shall not exceed:

$$E = 1.02 * Q^{0.769},$$

Where:

E = maximum emissions in lbs/hr for each million BTU per hour heat input; and

Q = maximum heat input capacity in million BTU per hour

J. **Particulate Matter - Opacity Limits**

1. SIP Limitation [*Currently federally enforceable pursuant to PGAQCD Reg. 7-3-1.1 (6/16/80) approved as a SIP element at 47 FR 15579 (4/12/82)*] (Code §§2-8-300. and 4-2-040.)

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 in 40 CFR 60, Appendix A. The following are affected sources at this facility: ovens (non-incinerating), dryers, washers and spray/powder coat booths.

K. **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.

L. 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.

M. Fuel Use Limitations *[Federally Enforceable Provision pursuant to code §3-1-081(9/5/01) approved as a SIP element at 66 FR 63166 (12/5/01)]*

1. Primary Fuel (Code §§3-1-081)

The Permittee is allowed to burn natural gas in the boiler, ovens and incinerator.

2. Other Fuels (Code §§3-1-081.G, 5-23-1010.F)

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

N. 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 §§3-1-081.E., 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. Performance Testing – Incinerators *[Federally Enforceable Provision pursuant to code §3-1-083 (2/22/95) and §3-1-170 (11/3/93) approved as a SIP element at 65 FR 79742 (12/20/00)]*

1. Testing Methods

- a. To determine compliance with the standards prescribed in §3.G of this permit, the permittee shall use the reference methods found in Appendix A of 40 CFR 60, as follows:
 - i. Method 5 for the concentration of particulate matter and the associated moisture content. The sampling time for each run shall be at least 60 minutes and the minimum sample volume shall be 0.85 dscm (30.0 dscf.)
 - ii. Method 1 for sample and velocity traverses.
 - iii. Method 2 for velocity and volumetric flow rate.
 - iv. Method 3 for gas analysis and calculation of excess air, using the integrated sampling technique.
- b. Permittee shall ensure that the main chamber and the afterburner temperatures, during the performance testing, stay within the manufacturer's specified range

- c. The performance test shall be conducted at the maximum charging rate of the unit.
- d. If the incinerator is not functional on the date of the required testing, that unit shall be tested within sixty (60) days after achieving the capability to operate.

2. Testing Protocol

A test protocol shall be submitted to the District for approval at least thirty (30) days prior to the test.

3. Testing Notice

Notice of performance testing required by this permit shall be submitted to the District at least thirty (30) days prior to running the test.

4. Testing Report

A copy of the test report shall be submitted to the District for approval within forty-five (45) days after the test.

5. Recurring Testing

Within five years of the previous performance test, Permittee shall conduct a performance test as required in Section §4.A.1 of this permit

B. Opacity Monitoring [*Federally Enforceable pursuant to code §3-1-083 (2/22/95) approved as a SIP element at 65 FR 79742 (12/20/00)*] (~~Codes §§2-8-320 and 3-1-083~~)

On at least a ~~semi-annual~~ **monthly** basis, Permittee shall conduct a visual opacity screen test on all the fuel burning devices at the facility. If visible emissions are observed from any of the devices, Permittee shall have a full method 9 opacity test performed by a certified opacity observer, and shall provide a copy of the resulting report to the District within 10 days. **Records of each monthly visual screening shall also be kept.**

C. ~~Non-Instrumental Emissions Monitoring and Recordkeeping -VOCs Emission Cap Compliance~~ [*Federally enforceable provision, pursuant to Code §3-1-084 (8/11/94) approved as a SIP element at 61 FR 15717 (4/9/96)*]

1. ~~Material Permit Condition (Code §3-1-109)~~

~~Within the meaning of Code §3-1-109, all emission limitations pertaining to establishment of and compliance with an emission cap shall constitute material permit conditions.~~

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

1. Product Labeling

To enable compliance verification with respect to the foregoing product formulation and use limitations, all containers containing one or more gallons of material containing more

than **five percent** (5%) by volume of VOC shall be in closed containers and legibly labeled to identify the contents.

2. Consumable Log

Permittee shall maintain a Consumable Log that includes:

- a. A listing of all Consumables utilized in the subject operation, including a separate listing for each paint, coating or solvent that identifies for 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
- b. A copy of the MSDS sheet for each Consumable product.

3. Product Use Reconciliation

Within ten (10) working days of the close of each calendar month, in order to assess compliance with the preceding emission caps and product use limitations:

- a. Permittee shall tabulate and record in an "Individual Product Use" section of the Consumable Log the quantity of each respective Consumable product used during each calendar month;
- b. Permittee shall calculate and record in a "Total Product Use" section the total quantity of Consumable products used in the preceding month;
- c. Permittee shall calculate a 3-month rolling average of use of each of the Consumable products defined above.

4. Minimum Standards for Inventory Control

Within thirty (30) days of the end of each calendar half, Permittee shall conduct a physical inventory of Consumables, reconcile the product-use records with the inventory on hand, and include a copy of the reconciliation worksheet in an "Inventory Reconciliation" section of the Consumable Log. Appendix B of this permit may be used to submit such information.

D. **Non-instrumental Emissions Monitoring - Oxides of Nitrogen (NO_x) and Carbon Monoxide (CO) (Code §3-1-083)**

Since the emissions of nitrogen oxides and carbon monoxide authorized under this permit constitute a direct function of combustion operations, Permittee shall maintain monthly records of the purchases of natural gas. This information will serve as a surrogate for potential emissions of nitrogen oxides (NO_x) and carbon monoxide (CO).

E. **Overspray Control Compliance (Code §3-1-083)**

1. Inlet Velocity Verification

On an annual basis, within one month prior to the annual report under this permit, Permittee shall conduct a velocity screening to assess inlet velocity at each of the inlets to each of the spray booths. Permittee shall include with the annual report a description of the equipment used to conduct that screening, as well as whether the observed velocity met the minimum value defined above.

2. Manometer Monitoring

At least once per week, Permittee shall observe each manometer reading, record that value, and shall note whether the observed pressure drop exceeds the maximum value defined above.

~~D. Testing Requirements for Incinerators (Code §5-3-100.F.1)~~

~~1. Permittee shall conduct tests for the purpose of determining compliance with the particulate matter standard on each incinerator. These tests shall be repeated every permit term, no later than 5 years from the previous test.~~

~~2. If any incinerator is not functional on the date of the required performance test that unit shall tested within 60 days after achieving the capability to operate.~~

~~3. The Performance Test conditions shall represent the average conditions described in the permit application with primary chamber operating at a temperature within the range allowed by this permit and at maximum load capacity and the afterburner operating at a temperature within the range allowed by this permit.~~

~~4. Reference method in 40 CFR 60, Appendix A shall be used to determine compliance with the standards prescribed above.~~

~~a. Method 5 for the concentration of particulate matter and the associated moisture content. The sampling time for each run shall be at least 60 minutes and the minimum sample volume shall be 0.85 dscm (30.0 dscf.)~~

~~b. Method 1 for sample and velocity traverses.~~

~~c. Method 2 for velocity and volumetric flow rate.~~

~~d. Method 3 for gas analysis and calculation of excess air, using the integrated sampling technique.~~

~~4. The operator shall furnish the District with a test protocol at least 30 days before each test is conducted, and a written report of the results within 45 days of the completion of the test.~~

F. Compliance Demonstration and **Monitoring Requirements** - NESHAP Subpart XXXXXX [40 CFR Part 63, §§63.11516(f)(3) through (8), §63.11517]

If the facility uses 2000 pounds or more per year of welding rod containing one or more MFHAP (calculated on a rolling 12-month basis) permittee must additionally implement the following for each welding operation that uses materials that contain MFHAP.

1. Tier 1 Compliance Requirements

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 EPA Method 22 of 40 CFR part 60 Appendix A-7, 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.

a. Schedule of Tests:

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

i. Daily Observations

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

ii. Weekly Observations

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.

iii. Monthly Observations

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

iv. Quarterly observations

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

b. Corrective Action

i. 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.

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

2. Tier 2 Compliance Requirements **Upon Subsequent Detection of Visible Emissions**

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:

- a. 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-4 during normal operations, at the primary vent, stack, exit or opening from the building containing the welding operations.
- b. In lieu of conducting the Method 22 determinations of subsection 2 above, Permittee shall conduct Method 9 observations as described in the previous subsection, according to the following schedule:
 - i. Daily testing

Conduct Method 9 tests once per day during operations.
 - ii. 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.
 - iii. 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.
 - iv. 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.
 - v. 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.

- c. Permittee shall keep records of each visual determination of emissions along with any corrective action taken.
- d. 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.

3. Tier 3 ~~Compliance~~ Requirements for Opacities Exceeding Twenty Percent (20%)

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

- a. Submit a report of exceedance of 20% opacity along with your semi-annual report and annual certifications.
- b. Within 30 days of the opacity exceedance, prepare and implement a Site-Specific Welding Emissions Management Plan ~~in accordance with as specified in subsection 5 below, 40 CFR §63.11516(f)(8)~~, or if there's an existing Plan, prepare and implement a revised Plan.
- c. 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.
- d. Maintain records of daily visual determinations performed during the preparation of the Site-Specific Welding Emissions Management Plan.

4. Site-Specific Welding Emissions Management Plan

The Site-Specific Welding Emissions Management Plan must include:

- a. Company name and address;
- b. A list and description of all welding operations which currently comprise the welding affected source;
- c. A description of all management practices and/or fume control methods in place at the time of the opacity exceedance;
- d. A list and description of all management practices and/or fume control methods currently employed for the welding affected source;
- e. A description of additional management practices and/or fume control methods to be implemented and the projected date of implementation;
- f. Any revisions to the plan must contain copies of all previous plan entries;
- g. The plan must be updated annually and submitted with the compliance report and annual certifications.

h. The plan must be available for inspector review.

G. **Notification, Recordkeeping and Reporting** Requirements - NESHAP Metal Fabrication and Finishing [*Federally Enforceable pursuant to 40 CFR Part 63 Subpart XXXXXX*]

1. Notification Requirements [*40 CFR §§63.11519(a)*]

Permittee shall submit a notification of compliance status to the District within 120 days of exceeding 2000 pounds of welding rod usage based on a rolling 12-month total. The notification shall:

- a. 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, certifying the truth accuracy and completeness of the report.
- ~~b.~~ Contain a statement of whether the source has complied with all the relevant applicable standards and other requirements as described in Section §4.F of this section. ~~described in Section 3.H and 4.E of this permit~~
- c. Contain the company name and address and date of the notification.

2. Reporting Requirements [*40 CFR §§63.11519(b)*]

The semi-annual compliance reports required by §4.I ~~G~~ below shall contain the following with respect to any observance of visible emissions during Method 22 or Method 9 testing as required by Section 3.H.3 of this permit.:

- a. The date of every visual determination of fugitive emissions via 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.
- b. The date of every opacity test via 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.
- c. An exceedance report whenever the 6-minute average opacities recorded during a test exceed 20%, including the date it occurred and the opacity recorded.
- d. 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.

3. Recordkeeping Requirements [*40 CFR §§63.11519(c)*]

Permittee shall collect and keep records of the following data. Each record shall kept for 5 years with at least 2 years on-site after the occurrence, measurement, corrective action, report or record:

- a. Each notification and report submitted to comply with 40 CFR Part 63 Subpart XXXXXX, and the documentation supporting each notification and report;

- b. Records of the applicability determinations as described in 40 CFR §63.11514(b)(5), "Am I subject to this subpart" listing equipment included in the affected source, as well as any changes to that and on what date they occurred.
- c. For each Method 22 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 Method 9 visual determination of emissions opacity, record the date of each determination, the average of the 6-minute opacities measured by the test and a description of any corrective action taken.
- e. Manufacturer's instructions.
- f. Record the monthly amount of welding rod/wire used in pounds.
 - i. On the first day of each month calculate and record a rolling 12-month total.
 - ii. Once the rolling 12-month total equal or exceeds 2000 pounds the permittee must implement the provisions listed in Section 3.H.3 of this permit.

H. General Recordkeeping [*Federally enforceable provision, pursuant to Code §3-1-084 (8/11/94)*]

Permittee shall maintain records of:

- 1. All information required pursuant to any provision of this permit, recorded in a permanent form suitable for inspection.
- 2. The occurrence and duration of any start-up, shutdown or malfunction in the operation of the permitted facility or any air pollution control equipment. For purposes of this provision, a "shut-down" means a cessation of operations at the entire facility for more than seven days, and a "start-up" constitutes the reactivation of the facility after a "shut-down."

I. Semi-annual Compliance Reporting [*Federally Enforceable pursuant to code §3-1-083 (2/22/95) approved as a SIP element at 65 FR 79742 (12/20/00)*] (~~Code §3-1-083.A~~)

Permittee shall submit a semi-annual report of emissions by submitting a copy of so much of the "Total Product Use" section of the Consumable Log as may be required to reflect product use in the preceding calendar half, along with the "Inventory Reconciliation" for the corresponding period and any visible emission records as required by Section 4.F of this permit. 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.

J. Annual Regular Compliance/Compliance Progress Certification [*Federally Enforceable pursuant to code §3-1-083 (2/22/95) approved as a SIP Element at 65 FR 79742 (12/20/00)*] [~~*Federally Enforceable pursuant to 40 CFR 63.11519*~~] (~~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, certifying the truth accuracy and completeness of the report;
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;
6. Contain the company name and address, the responsible official's name, title, and signature, date of the report, and the date range covered by the report.
7. Be postmarked within thirty (30) days of the start of each calendar year.

5. Other Reporting Obligations

A. ~~Reporting Requirements for Incinerator~~

~~Permittee shall log and report the "shut down" periods of the incinerator. Shut down represents the periods when the primary chamber was shut down due to malfunctioning of the secondary chamber.~~

A. Deviations from Permit Requirements [*Federally Enforceable pursuant to code §3-1-081.A.5.b (9/5/01) approved as a SIP element at 66 FR 63166 (12/5/01)*] (~~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.

B. Annual Emissions Inventory [*Federally Enforceable pursuant to code §3-1-103 (2/22/95) approved as a SIP element at 65 FR 79742 (12/2/00)*]

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

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;
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. Renewal of Permit (Code §3-1-050)

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 §§3-1-081.A.8.b, 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 (8/15/94) approved as a SIP Element at 61 FR 15717 (4/9/96)]*

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.A.8.d)

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, 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.
- ~~1. In the event of a failure of air pollution control equipment, or malfunction, or abnormal operation of any equipment, any of which results in a violation of an applicable emission limitation set forth in this permit, including either an increase of emissions above a rate limitation or violation of an operating limitation, then the Permittee, shall comply with the provisions of Code §8-1-030 and ARS §49-476.01, including notifying the District of such event within 24 hours or by the next business day, whichever is later. Permittee shall notify the District at phone number (520) 868-6760, and shall provide a written report within three (3) working days of the beginning of such occurrence. The obligation under this section shall arise when an occurrence results in an increase of emissions above:~~
- ~~a. Enforceable rate limitations established for those pollutants addressed in this Permit; or~~
 - ~~b. For any other pollutant, any applicable limitation arising under the Code.~~
- ~~2. A malfunction (as defined by Code §1-3-140.80) is any sudden and unavoidable failure of air pollution control equipment or process equipment or a process to operate in a normal and usual manner. Failures that are caused by poor maintenance, or could have been prevented by the exercise of reasonable care shall not be considered a malfunction.~~

~~3. An "emergency" shall be defined according to the inclusions and exclusions set forth in Code §3-1-081.E.1., and the emergency response provisions in Code §3-1-081.E. are applicable to this permit.~~

8. Equipment List

A. Equipment (Code §3-1-050.B)

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

1. (2) 30' x 10' Powdercoating Booth (Equipped w/ Filter Systems) ~~in accord with the permit requirements;~~
2. (2) Manual Spray Paint Booths - Top-Coating and Painting (Equipped w/ Filter Systems) ~~in accord with the permit requirements~~
3. ~~Natural Gas Burners~~ **Fuel Burning Equipment:**
 - a. ASME Hot Water Boiler - 3.0 MM Btu/hr
 - b. Flash-Off **Drying** Oven - 2.0 MM Btu/Hr.
 - c. Curing (Bake) Oven
 - i. Zone #1 - 2.0 MM Btu/Hr
 - ii. Zone #2 - 1.5 MM Btu/Hr
 - d. ~~(2)~~ Natural Gas Operated Incineration Unit w/ Afterburner - 500,000 btu/hr
4. (2) 3-Sided Spray Coating Bench Booth w/ Filters
6. ~~Solvent Cleaning Unit~~
5. **Welding Process**

B. Insignificant Activities

1. ~~VOCs Emissions From the Lubricants / Oils~~
2. ~~VOCs / VHAPs emissions from the Sealants and Adhesives~~
3. Aerosol **Spray Can Paints** emissions.
4. Wastewater Neutralization Plant
5. DI Water Plant

C. Emission Inventory Table

ID	Emission Units	Pollutants	Emission Rate (Tons/Yr.)
1	Paint Booths and Powder Coating Booths	Volatile Organic Compounds (VOCs)	39.0 47.5
		Particulate Matter (PM₁₀)	8.0
2	Solvent Cleaner	Volatile Organic Compounds (VOCs)	40.1

2	Welding	Hazardous Air Pollutants (HAPs)	< 0.1
3	Incinerator, Ovens, and Dryers Fuel Burning Equipment	Nitrogen Oxides (NO _x)	25.9 4.0
		Carbon Monoxide (CO)	4.1 3.5
		Particulate Matter (PM ₁₀)	3.4 0.4
		Sulfur Dioxide (SO _x)	< 0.1
		Volatile Organic Compounds (VOCs)	0.2 0.3
		Hazardous Air Pollutants (HAPs)	0.1

Appendix A

Semi-Annual Report

Permit ~~B31262.000~~ B31421.000

Abstract

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

Facility - Price Industries Inc.
Price Industries - Casa Grande Plant
999 North Thornton Road, Casa Grande AZ

Reporting Period - January to June ___ or July to December ___ Year _____

Material Report - SUBMIT the “Total Product Use” section of the Consumable Log for the reporting period, as required by §4.B.2 of this permit. Appendix B may be used for this purpose

Powdercoating Used - _____ lbs

~~Spray Coating~~ **Water-Based** Paints Used - _____ gallons

Natural Gas Purchased - _____ therms (from bills)

~~Solvent cleaner used _____ gallons~~

Were consumable logs maintained as required? Yes _____ No _____

Were product use reconciliations conducted as required? Yes _____ No _____

Were consumable product inventory reconciliations conducted as required? Yes _____ No _____

Were there any “shut down” periods during the incinerator operations? Yes _____ No _____

Did the surface coating processes follow the standards found in §3.E? Yes _____ No _____

Operations Report

For the annual report, were inlet velocity screenings conducted as required? Yes _____ No _____

Were manometer observations conducted as required? Yes _____ No _____

~~Number of hours of operation of the ovens (over six months period) _____ hours~~

~~Number of hours of operation of the incinerators (over six months period) _____ hours~~

Was the incinerator tested as required by §4.A? Yes _____ No _____

Were opacity screenings conducted as required by §4.B? Yes _____ No _____

Area Source NEHAP Requirements

Most recent rolling 12-month amount of welding rod/wire used - _____ pounds

If more than 2000 pounds of welding rod has been used in any rolling 12 month time period were the visual determinations of welding fugitive emissions conducted as required under Section 3.H of this permit?

..... Yes _____ No _____
(Attach records of the Method 22 and Method 9 tests conducted that include dates and results)

Did any Method 9 test exceed 20% opacity?..... Yes _____ No _____

If yes, was a Site-Specific Welding Emissions Management Plan prepared? Yes _____ No _____
(Attach a copy of the Site-Specific Welding Emission Plan)

Certification by Responsible Person

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

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 _____

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