

KOHLER CO. - CASA GRANDE

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1. Introduction

This permit pertains to a reinforced plastics composite plumbing fixture fabrication facility, operated by Kohler Co. The SIC Code is 3088. The facility, also known as Kohler, is located at 1495 North Ethington Road, Casa Grande, Arizona, upon the parcel identified by Pinal County Assessor's Parcel #s 503-35-0040, 503-35-0050, and 503-35-0060. The source is situated in an area classified as non-attainment for PM₁₀ and attainment for ozone.

This Revision V20694.R01 updates the capacity of one of the permitted emergency generators from 800 kW to 1500 kW. Since the emissions are less than the significance threshold of nitrogen oxides from the change in capacity, this revision qualifies as a minor revision.

The facility is a major source of hazardous air pollutants (HAPs) with a potential to emit 226 tons of styrene, generated from the sixteen (16) sheet-molding compound (SMC) closed-molding processes. Matured SMC is conveyed to the closed molding presses which heat up and the SMC sheets conform to the shape of the mold in the press. Upon molding completion, the parts are removed from the mold and sent to be trimmed. Other processes at the site which emit VOCs, HAPs, and PM₁₀ are resin storage, SMC Mixing, SMC Compounding line, SMC Maturation, trimming stations and touch-up painting. Baghouses with a control efficiency of 95% are used to control emissions from SMC mixing, SMC compounding, and trimming.

The facility will also install five (5), 15 mm btu/hr each, natural gas boilers, and two diesel fueled 800 kW and 1,000 kW emergency generators.

A list of equipment from which emissions are allowed by this permit is given in Section 8 of this permit. Emissions listed in the last section of this permit constitute the emissions subject to regulation, as allowed by this permit.

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

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

- A. Those specific provisions of the Pinal-Gila Counties Air Quality Control District ("PGAQCD") Regulations, as adopted by the Pinal County Board of Supervisors on March 31, 1975, and approved by the Administrator as elements of the Arizona State Implementation Plan ("SIP") at 43 FR 50531, 50532 (11/15/78), and specifically the following rules:

7-3-1.1 Visible Emissions: General
 7-3-1.2.A Fugitive Dust
 1-3-1.8 Particulate Matter: Process Industries

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

1-3-1.1 Visible Emissions: General

- C. National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW [40 CFR §§63.5780-63.5935]

- D. National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart PPPP [40 CFR §§63.4480-63.4581]
- E. National Emission Standards for Hazardous Air Pollutants: Industrial for Institutional, Commercial, and Industrial Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD [40 CFR §§63.7480-63.7575]
- F. New Source Performance Standards: Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc [40 CFR §§60.40c-60.48c]
- G. New Source Performance Standards: Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart IIII [40 CFR §§60.4200-60.4219]

3. 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 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.

4. Emission Limitations and Controls

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

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

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

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

- C. Emission Caps - Volatile Organic Compounds, Hazardous Air Pollutants, and Particulate Matter [*Federally Enforceable §3-1-084*] (Code §3-1-081.A)

- 1. Emission Caps to Avoid PSD/NSR Review

- a. Permittee shall limit facility wide total VOC emissions, in any consecutive twelve-month period, to 245 tons.
 - b. Permittee shall limit the facility wide total HAP emissions, in any consecutive twelve-month period, to 245 tons.
 - c. Permittee shall limit the facility wide total PM10 emissions, in any consecutive twelve-month period, to 65 tons.
2. Emission Cap to Avoid Add-on Control Device [*Federally Enforceable 40 CFR §§63.5805.(c) and (d)*]
- Permittee shall limit the VOC/HAPs emissions, in any consecutive twelve-month period from the SMC Mixing process (EP002) and SMC Compounding process (EP003) to below 100 tons.
3. Process Controls
- To stay within the preceding emission caps of VOC, HAPs, and PM10, and thereby also avoid classification, and regulation, as a major source under PSD, Permittee shall install and maintain:
- i. Dust collectors to control particulate matter emissions from the SMC Mixing, SMC Compounding, and Trimming Stations.
 - ii. All air pollution control devices and capture systems for which this permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.
4. Facility Wide Limited Emissions
- i. The emission cap and process controls required by this permit will limit the potential emissions of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) to 223 tons per 12-month rolling period.
 - ii. The emission cap and process controls required by this permit will limit the potential emissions of PM10 to 26 tons per 12-month rolling period.
- D. Applicable Standards – NESHAP Subpart WWWW
1. Organic HAP Content Determination [*Federally Enforceable 40 CFR §§63.5797.(a),(b), and (c)*]
- Organic HAP content of resins and gel coats can be determined by relying on the information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS), or using the following procedures as applicable:
- a. Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for Occupational Safety and Health Administration-defined carcinogens, as specified in 29 CFR

1910.1200(d)(4) and at 1.0 percent by mass or more for other organic HAP compounds.

- b. If the organic HAP content is provided by the material supplier or manufacturer as a range, an upper limit of the range shall be used for determining compliance. If a separate measurement of the total organic HAP content, such as an analysis of the material by EPA Method 311 of appendix A to 40 CFR part 63, exceeds the upper limit of the range of the total organic HAP content provided by the material supplier or manufacturer, then measured organic HAP content shall be used to determine compliance.
- c. If the organic HAP content is provided as a single value, that value may be used to determine compliance. If a separate measurement of the total organic HAP content is made and is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then the provided value may still be used to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then measured organic HAP content shall be used to determine compliance.

2. Calculating Organic HAP Emissions [*Federally Enforceable 40 CFR §§63.5799.(a)*]

- a. For new facilities prior to startup, calculate a weighted average organic HAP emissions factor for the operations specified in §63.5805(c) and (d) on a lbs./ton of resin and gel coat basis. Base the weighted average on the projected operation for the 12 months subsequent to facility startup. Multiply the weighted average organic HAP emissions factor by projected resin use over the same period. Organic HAP emissions factor may be calculated based on the factors in Table 1 to this subpart, or any HAP emissions factor may be used upon department's approval, such as factors from the "Compilation of Air Pollutant Emissions Factors, Volume I: Stationary Point and Area Sources (AP-42)," or organic HAP emissions test data from similar facilities.
- b. New facilities, after startup, shall use the following procedure to calculate HAP emission factors:
 - i. Calculate a weighted average organic HAP emissions factor on a lbs/ton of resin and gel coat basis. Base the weighted average on the prior 12 months of operation. Multiply the weighted average organic HAP emissions factor by resin and gel coat use over the same period. Any HAP emissions factor may be used upon department's approval, such as factors from AP-42, or site-specific organic HAP emissions factors if they are supported by HAP emissions test data.

3. Work Practice Standards [*Federally Enforceable 40 CFR §§63.5805.(c), Table 4*]

- a. A new facility that emits less than 100 tpy of HAP from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing shall meet the following applicable work practice standards:

- i. Uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.
 - ii. Not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
 - iii. Keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
 - iv. Close or cover the resin delivery system to the doctor box on each SMC manufacturing machine. The doctor box itself may be open.
 - v. Use a nylon containing film to enclose SMC.
 - b. If an add-on control device is used to comply with this subpart, all Requirements contained in 40 CFR part 63, subpart SS shall be met.
- E. Organic HAP Emission Limit, Subpart PPPP [*Federally enforceable 40 CFR §§63.4490.(a).(1), 63.4491.(a), 63.4500.(a).(1)*]
- 1. For each new general use coating affected source, limit organic HAP emissions to the atmosphere to no more than 0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.
 - 2. Permittee shall use the compliant material option to demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit in § 63.4490.(a).(1), and that each thinner and/or other additive, and cleaning material used contains no organic HAP. You must meet all the requirements of §§ 63.4540, 63.4541, and 63.4542 to demonstrate compliance with the applicable emission limit using this option.
 - 3. Any coating operation(s) for which you use the compliant material option or the emission rate without add-on controls option, as specified in § 63.4491(a), must be in compliance with the applicable emission limit in § 63.4490.(a).(1) at all times.
- F. Emission Limitations, Work Practice Standards, and Operating Limits, Subpart DDDDD [*Federally enforceable 40 CFR §§63.7500.(a).(3),(f), Table 3.(3), §63.7505.(a)*]
- 1. A new boiler or process heater without a continuous oxygen trim system and with heat input capacity of 10 million Btu per hour or greater shall conduct a tune-up of the boiler or process heater annually.

2. At all times, you must operate and maintain any affected source (as defined in §63.7490), including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.
3. You must be in compliance with the emission limits, work practice standards, and operating limits in this subpart. These emission and operating limits apply to you at all times the affected unit is operating.

G. NSPS Standards - Stationary Compression Ignition (CI) and Internal Combustion Engines [*Currently federally enforceable; 40 CFR §§60.4202.(a).(2), 60.4205.(b)*]

1. Engines Emission Limits

Stationary CI internal combustion engine manufacturers must certify their 2007 model year and later emergency CI ICE with a maximum engine power greater than or equal to 37 KW (50 HP) and displacement of less than 10 liters per cylinder, that are not fire pump engines according to the following emission standards:

Unit	Mfg. Date	Displacement per Cylinder (l)	NMHC + NOX g/kw-hr	CO g/kw-hr	PM g/kw-hr
Kohler 1,500 kW	2006+	2.25	6.4	3.5	0.2
Kohler 1,000 kW	2006+	< 10	5.65	0.53	0.06

2. Engines Smoke Standards

The smoke standards in this section apply to all engines subject to emission standards under this part, except for the following engines:

- a. Single-cylinder engines.
 - b. Constant-speed engines.
 - c. Engines certified to a PM emission standard or FEL of 0.07 g/kW-hr or lower.
3. Measure smoke as specified in 40 CFR §1039.501(c). Smoke from the engines may not exceed the following standards:
 - a. 20 percent during the acceleration mode.
 - b. 15 percent during the lugging mode.
 - c. 50 percent during the peaks in either the acceleration or lugging modes.

H. 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

The Permittee is allowed to burn only natural gas in the boilers and diesel fuel in the emergency generators.

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.

3. Primary Fuel for the Emergency Generators, Subpart IIII [**40 CFR §60.4207(a)**]

a. Owners and operators of CI and ICI with a displacement of less than 30 liters per cylinder that use diesel fuel must only use diesel fuel meeting the requirements of 40 CFR 80.510(b) which requires that diesel fuel shall:

- i. Have a maximum sulfur content of 15 parts per million (ppm) and;
- ii. Either a minimum cetane index of 40 or a maximum aromatic content of 35 volume percent.

I. Nitrogen Oxides Emission

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

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

J. Particulate Emissions – Process Industries [***Currently federally enforceable pursuant to PGAQCD Reg. 7-3-1.8 (3/31/75) approved as a SIP element at 43 FR 50531 (11/15/78)***] (Code §5-5-190)

Permittee shall capture, to the maximum practical extent, all particulate matter resulting from operation of individual equipment comprising the complete process. Permittee not cause, suffer, allow or permit the discharge of particulate matter into the atmosphere in any one hour from any existing process source whatsoever, except fuel-burning equipment, in total quantities in excess of the amount calculated by whichever of the following equations may be applicable:

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

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

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

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

K. Particulate Emissions – Opacity Limits

1. SIP Limitation [***Federally enforceable pursuant to PGAQCD Reg. 7-3-1.1 (8/7/80) approved as a SIP element at 47 FR 15580 (4/12/82)***] (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 pursuant to Code §2-8-300 (5/18/05) approved as a SIP element at 71 FR 15043 (3/27/06)*]**

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

- L. **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.

- M. **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.
- 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)*]

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.

5. Compliance Demonstration

A. Initial Performance Testing (Code §3-1-170)

Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but no later than 180 days after initial startup of such facility, the owner or operator shall conduct the following performance tests to quantify PM10 emissions using standard approved EPA test methods or equivalent test methods as approved by the District. All the performance tests shall be run at the maximum practical production load possible.

1. Baghouses/Filters (CE-006 and CE-007)

The test report shall indicate PM10 emission rates in pounds/hour, as well as in tons per year.

2. Test Protocol

Test protocols for all the tests shall be submitted to the District at least thirty (30) days prior to the test.

3. Performance Test Notice

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

4. Test Report

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

5. Subsequent Performance Tests

If the results of the initial tests show compliance with the permit requirements and limits, subsequent tests shall be performed within five (5) years of the previous performance tests. If the results show violation of the permit requirements, then the tests shall be conducted on an annual basis, until compliance is achieved, at that point the permittee may resume testing every five years.

B. Performance Tests, Fuel Analyses, and Tune-ups, Subpart DDDDD [*Federally enforceable 40 CFR §63.7515.(d)*]

If you are required to meet an applicable tune-up work practice standard, you must conduct an annual tune-up according to §63.7540(a)(10). Each annual tune-up specified in §63.7540(a)(10) must be no more than 13 months after the previous tune-up. For a new or reconstructed affected source (as defined in §63.7490), the first annual tune-up must be no later than 13 months after the initial startup of the new affected source.

C. General Compliance Requirements, Subpart WWW [i>Federally enforceable 40 CFR §63.5835.(a), (b), and (c)]

1. Permittee must be in compliance at all times with the work practice standards in Section §4.D.3 of this permit.
2. Permittee must always operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions in §63.6(e)(1)(i).

D. Continuous Compliance with Standards Requirements, Subpart WWW [*Federally enforceable 40 CFR §63.5900*]

1. Continuous compliance with each applicable standard in §63.5805 must be demonstrated in the following manner:
 - i. Compliance with the work practice standards in Table 4 to this subpart is demonstrated by performing the work practice required for your operation.

2. Each deviation from each applicable standard in §63.5805 of this permit must be reported. The deviations must be reported according to the requirements in §63.5910.
 3. All the applicable HAP emissions limits and work practice standards must be met at all times.
- E. Compliance Reports Submittal, Subpart WWWW [*Federally enforceable 40 CFR §§63.5910, 63.5912*]
1. Permittee shall submit each compliance report by the date specified in Table 14 of this subpart.
 2. All compliance reports shall cover the period and shall be postmarked by the dates specified in Sections §63.5910.(b) (1-5) of this subpart.
 3. All compliance reports shall contain the information as required in Section §63.5910.(c) of this subpart.
 4. All deviations associated with emission limits, operating limits, and work practice standards shall be reported as required in Sections §§63.5910.(d), (e), (f), and (g) of this subpart.
- F. Initial and Continuous Compliance Requirements, Subpart DDDDD [*Federally enforceable 40 CFR §§63.7510.(g), 63.7540.(a).(13)*]
1. For new or reconstructed affected sources, you must demonstrate initial compliance with the applicable work practice standards in Table 3 to this subpart within the applicable annual schedule as specified in §63.7515(d) following the initial compliance date specified in §63.7495(a). Thereafter, you are required to complete the applicable annual tune-up as specified in §63.7515(d).
 2. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup.
- G. Compliance Reports Submittal, Subpart DDDDD [*Federally enforceable 40 CFR §§63.7545.(a), (c), 63.7550.(a), (b), (c).(1)*]
1. You must submit to the Administrator all of the notifications in §§ 63.7(b) and (c), 63.8(c), (f)(4) and (6), and 63.9(b) through (h) that apply to you by the dates specified.
 2. If you startup your new or reconstructed affected source on or after January 31, 2013, you must submit an Initial Notification not later than 15 days after the actual date of startup of the affected source. For a new or reconstructed affected source that has reclassified to major source status, you must submit an Initial Notification not later 120 days after the source becomes subject to this subpart.
 3. Each report must be submitted in Table 9 to this subpart as applicable.
 4. For units that are subject only to a requirement to conduct subsequent annual tune-up according to §63.7540(a)(10), and not subject to emission limits or Table 4 operating limits, you may submit only an annual compliance report instead of a semi-annual compliance report.

5. All compliance reports shall contain the information as required in Section §63.7550.(c) of this subpart.
- H. Recordkeeping Requirements, Subpart DDDDD [*Federally enforceable 40 CFR §§63.7555.(a).(1),(2), 63.7560.(a), (b), (c)*]
1. A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report that you submitted, according to the requirements in §63.10(b)(2)(xiv).
 2. Records of performance tests, fuel analyses, or other compliance demonstrations and performance evaluations as required in §63.10(b)(2)(viii).
 3. Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1).
 4. As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
 5. You must keep each record on site, or they must be accessible from on site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). You can keep the records off site for the remaining 3 years.
- I. Reporting and Recordkeeping Requirements, Subpart Dc [*Federally enforceable 40 CFR §60.48c.(a).(1), (g).(2)*]
1. Permittee shall comply with the notification requirements in accordance with Section §60.48c.(a).(1).
 2. Permittee shall record and maintain the amount of natural gas combusted during each calendar month.
- J. Operational Compliance Demonstration for CI or ICE [*40 CFR §60.4211(a)*]
1. All engines and control devices must be installed, configured, operated and maintained according to the specifications and instructions provided by the engine manufacturer.
 2. All the emergency stationary ICE is subject to the following standards:
 - a. Install a non-resettable hour meter.
 - b. There is no time limit on the use of emergency stationary ICE in emergency situations.
 - c. Emergency stationary ICE may be operated for a maximum of 100 hours per calendar year for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the

manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. Copies of such records shall be provided to the District upon request.

- d. Emergency stationary ICE may be operated for a maximum of 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response program.
- e. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

K. Calculation of Monthly VOC, HAP, and PM10 Emissions [*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. Calculation of Monthly VOC and HAP Emissions

Total actual monthly VOC and HAP emissions from the manufacture of Sheet Molding Compound (SMC) shall be calculated, and the results of this calculation shall be used in the calculations approved by the department to determine total facility VOC and HAP emissions. The following shall be used in calculating VOC emissions from the manufacture of SMC:

- a. The appropriate emission factors as provided through engineering or laboratory analysis.
- b. Total actual monthly VOC and HAP emissions from the use of solvents, coatings, and adhesives in the manufacture of SMC products shall be calculated, and the results of this calculation shall be used in the calculations to determine total facility VOC and HAP emissions.
- c. All calculations required pursuant to this section, shall be performed through the methodologies previously approved by the Department. Any proposed change in calculation methodology must be submitted to the Department for approval.

2. Calculation of Monthly PM10 Emissions

The PM10 emission rates of the CE-006 and CE-007 baghouses determined from the most recent performance testing shall be utilized until subsequent testing is performed and a new control efficiency and emission rates are calculated.

L. Regular Emissions Monitoring [*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. Non-instrumental Emissions Monitoring – Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs)

As a surrogate measurement for monitoring emissions of VOCs and HAPs, permittee shall:

- a. Keep monthly records of amount of resin containing material processed through Resin Storage, SMC Mixing, SMC Compounding, SMC Maturation, and SMC Closed Molding.
- b. Keep monthly records of the amount of paints and solvents consumed.
- c. A listing of all consumables utilized in the facility 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 VOC/HAP content.

2. Non-instrumental Emissions Monitoring - Particulate Matter

To verify effective control, dust collectors and filters shall be checked for visible emissions at least weekly during operations. If visible emissions are observed during any of the checks, they shall be inspected and cleaned or repaired as necessary. Permittee shall maintain records of these inspections, the cause for the visible emissions, and the corrective measures taken.

3. Non-instrumental Emissions Monitoring - Oxides of Nitrogen

As a surrogate measurement for monitoring emissions of oxides of nitrogen, permittee shall keep monthly records of the operational hours of the emergency engines and the natural gas usage from the boilers.

4. Non-instrumental Emissions Monitoring - Sulfur Dioxide

As an alternative to monitor fuel sulfur, permittee shall maintain a verification from the fuel supplier that diesel fuel for the engines does not contain more than 15 ppm sulfur by weight.

M. Recordkeeping [*Federally enforceable provision, pursuant to Code §3-1-084 (8/11/94)*] (Code §3-1-083)

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."

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

In order to demonstrate compliance with the provisions of this permit, the Permittee shall submit a semi-annual report containing a summary of the information required to be recorded pursuant to this permit, which summary shall clearly show that Permittee has complied with the operational and emissions limitations under this permit. All instances of deviations from permit requirements shall be clearly identified in such reports. For brevity, such deviation reports may incorporate by reference any written supplemental upset reports filed by Permittee during the reporting period. The report shall be submitted to the District within 30 days after the end of each calendar half. Appendix A is a form which may be used for this report.

O. Annual Regular Compliance/Compliance Progress Certification (Code §3-1-083.A.4.)

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. Identify each term or condition of the permit that is the basis of the certification;
3. Verify the compliance status with respect to each such term or condition;
4. Verify whether compliance with respect to each such term or condition has been continuous or intermittent;
5. Identify the permit provision, or other, compliance mechanism upon which the certification is based; and
6. Be postmarked within thirty (30) days of the start of each calendar year.

6. Other Reporting Obligations

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

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. Notification of Construction & Start-up [*Federally Enforceable, pursuant to 40 CFR Part 60.7] (Code §3-1-083)*

For new facilities and modification of existing facilities, the Permittee shall notify the District in writing of:

1. The anticipated date of initial start-up of each facility of the source for which construction or modification is allowed by this permit; notice shall be sent not more than sixty (60) days nor less than thirty (30) days prior to such date;
2. The actual date of commencement of construction; notice shall be sent within thirty (30) days of such date; and
3. The actual date of start-up; notice shall be sent within fifteen (15) days after such date.

C. Annual Emissions Inventory [*Federally Enforceable Provision 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.

7. **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.

8. **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.)

If the EPA objects to the “federally enforceable” designations under this permit, insofar as they are based on Code §3-1-084, then this permit may be subject to a Title V applicability determination after the EPA approves the District’s Title V operating permit program. If a Title V permit is required, this permit will need to be re-opened, will be subject to EPA review and public review, and may require additional revision. While the District will notify Permittee if the EPA objects to any of those federally enforceable designations under Code §3-1-084, the Permittee bears the responsibility of determining when-and-or-if such a Title V permit application must be filed.

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
- a. 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.

9. Facility Specific Data

A. Equipment (Code §3-1-050.B)

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

1. Resin Storage (EP001)
2. SMC Mixing (EP002)
3. SMC Compounding (EP003)
4. SMC Maturation (EP004)
5. 16- SMC Closed Molding Presses (EP005)
6. 16-Trimming Stations (EP006)
7. Rework, Touchup, and Equipment Cleaning (EP007)
8. 5 – Boilers, Natural Gas, 15 MM Btu/hr each (EP008-EP012)
9. Emergency Engine, Kohler, KD1500, Diesel, 1,500 kW (EP013)
10. Emergency Engine, Kohler, Diesel, 1,000 kW (EP014)
11. 6 –Baghouses (CE001, CE002, CE003, CE004, CE006, CE007)

B. Emission Inventory Table

Emissions generated from this facility can be found in Section §4 of the Technical Support Document (TSD).

Appendix A

Semi-annual Report

Permit V20694.R01

Abstract

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

Facility - Kohler Co.
1495 North Ethington Road, Casa Grande, AZ 85193

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

Material Usage

Amount of raw material processed - _____ pounds

Amount of paints and solvents consumed - _____ gallons

Natural gas consumed - _____ therms (from the bill)

Operational hours of the 800 kW emergency engine - _____ hours

Operational hours of the 1,000 kW emergency engine - _____ hours

Emissions Report

Total VOC emissions for the reporting period - _____ tons

Total HAP emissions for the reporting period - _____ tons

Total PM10 emissions for the reporting period - _____ tons

Compliance Report

Were the engines emission limits associated with Subpart IIII and listed in Section §4.G of this permit met?
Yes _____ No _____

Was the initial performance test on the baghouse/filters (CE-006 and CE-007) conducted as required in Section §5.A of this permit? Yes _____ No _____

If yes, then please list the date of the most recent performance test_____

Were the performance tests, fuel analyses and tune-ups associated with Subpart DDDDD conducted as required under Section §5.B of this permit?
Yes _____ No _____

Were the general compliance requirements associated with Subpart WWWW met as required under Section §5.C of this permit?
Yes _____ No _____

Were the continuous compliance with standards requirements associated with Subpart WWWW met as required under Section §5.D of this permit?
Yes _____ No _____

Were the compliance reports associated with Subpart WWWW submitted as required under Section §5.E of this permit?

Yes_____ No_____

Were the initial and continuous compliance requirements associated with Subpart DDDDD met as required under Section §5.F of this permit?

Yes_____ No_____

Were the compliance reports associated with Subpart DDDDD submitted as required under Section §5.G of this permit?

Yes_____ No_____

Were the recordkeeping requirements associated with Subpart DDDDD submitted as required under Section §5.H of this permit?

Yes_____ No_____

Were the reporting and recordkeeping requirements associated with Subpart Dc met as required under Section §5.I of this permit?

Yes_____ No_____

Were the operational compliance demonstration associated with Subpart IIII met as required under Section §5.J of this permit?

Yes_____ No_____

Were monthly VOC, HAP, and PM10 emissions calculated as required under Section §5.K of this permit?

Yes_____ No_____

Were the regular emissions monitoring requirement met as required under Section §5.L of this permit?

Yes_____ No_____

Certification by Responsible Official

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

Signed_____

Printed Name_____

Title_____

Contact Phone Number_____

Date_____

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

Email to: compliancereports@pinal.gov