

~~QUEMETCO METALS ARIZONA, LLC~~ **ECOBAT RESOURCES ARIZONA, LLC - CASA GRANDE**

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1. Introduction

This permit ~~renewal~~ pertains to an ~~existing~~ anode fabrication facility, operated by ~~Ecobat Resources Arizona, LLC~~ ~~Quemetco Metals Arizona, LLC~~. The SIC Code is 3499, and the NAICS code is 332999. The facility, also known as ~~Ecobat Resources Arizona~~, is located at 602 North Swanson Street, Casa Grande, Arizona, upon a parcel also identified by Pinal County Assessor's Parcel #507-12-005A. The source is situated in an area classified as nonattainment for PM₁₀, and ~~attainment for all other pollutants~~.

This facility fabricates anodes for zinc electrowinning and copper electrowinning applications, ~~from~~ ~~consisting of~~ copper hanger bars and lead-silver or lead-tin sheets.

Renewal B31251.000 updated references and added the stabilization requirement from the West Pinal Fugitive Dust rule. ~~This~~ ~~The~~ renewal also removed NESHAP 40 CFR Part 63, Subpart XXXXXX as an applicable requirement. NESHAP XXXXXX in part regulates HAPs from welding operations that have the potential to emit compounds of lead. As stated in 40 CFR 63.11514.b this does not include lead emissions in its elemental form. Elemental lead is instead regulated under the lead NAAQs. This facility utilizes a lead alloy rod and a bronzing style welding technique. The emissions from this activity are characterized as elemental lead emissions since the lead alloy rod contains lead in its elemental form (while the rod contains 94% lead, 6% antimony and several other minor components the lead is not chemically transformed into a compound). Since the lead emissions are in their elemental form this permit requires baghouses to capture these emissions. In contrast, NESHAP XXXXXX would allow for work practices to minimize emissions instead of a baghouse.

Revision B30924.R02 authorized the expanded use of existing equipment as well as the installation of new equipment. In addition, the applicable requirements of 40 CFR Part 63, Subparts XXXXXX and WWWWWW were incorporated into the permit through this revision. These subparts regulate Hazardous Air Pollutants (HAPs) in metal fabrication and plating/polishing operations.

The equipment installed included a second casting kettle for the anode fabrication plant and a second slab mold for the rolling mill. The casting kettle is the same size as the existing one, thus potentially doubling emissions from this part of the operation¹. Additionally, ~~QMA Ecobat was proposing~~ ~~proposed to double~~ ~~doubling~~ the capacity of the rolling mill to 20,000 lbs-Pb/hr. This equipment has the same level of capture and removal efficiency as the existing equipment.

The rolling mill capacity increase included the addition of a second casting slab mold. Previous revisions of this permit ~~had already~~ authorized a second melting kettle and assumed both would be operated simultaneously (as 20,000 lb/hr capacity), so ~~no further increase~~ ~~there was no increase~~ in emissions from the melting kettles ~~was considered for this revision~~.

Revision B30924.R01 proposed the addition of a rolling mill. In the mill, lead is ~~be~~ melted in a steel kettle at approximately 870°F, and then poured into lead molds. After cooling, the cast slabs ~~will be~~ ~~are~~ squeezed between 2 metal rollers at raised temperatures until the required thickness is achieved. Emissions from the melting of the lead ~~will be~~ ~~is~~ captured and directed to ~~the existing~~ a dust collector. The total increase in emissions from the rolling mill ~~will does~~ not exceed 1 tpy of PM or 0.1 tpy of lead. To ensure that emissions estimates for lead and particulate matter are ~~accurate~~ ~~correct~~, ~~the permit requires testing the~~ ~~permittee is required to test~~ the dust collector emissions ~~while operating~~ ~~during operation of~~ the mill.

Copper bars are received and trimmed to the length necessary before bending. After bending, they are placed in a mill where slots are formed ~~where~~ ~~for~~ the lead sheets ~~will to~~ be inserted. After the mill, the bars are submerged for 5-10 minutes into a tank of zinc chloride to clean any oil, grease or dirt from the bars.

¹The permit application states that the 2 casting kettles will not be operated simultaneously. However, permittee submitted calculations and modeling data as if both kettles were operated simultaneously. Therefore, for future operational flexibility the permit does not restrict the operation of either kettle.

The bars used to produce copper anodes go through a tinning bath before anode assembly. They are dipped into a 600°F tank of molten lead with 15-20% tin. The alloy coats the bar, and the lead bonds with the bar.

Lead-silver and lead-tin sheets are received from the rolling mill or an outside supplier and passed through a roller/leveler, which flattens the sheet to remove any defects. The sheets are then cut into the desired shape with a router. Then they are passed through the roller/leveler again, to flatten the sheet further and remove any defects.

Anodes can be fabricated by one of three different methods:

1. In a continuous process, the copper hanger bar and the rolled lead sheet are joined on the burning table and a tin-lead alloy is used to form the bond between the sheet and the bar. The melting pot in this process is about 1 gallon in capacity, and electrically heated to 500-550°F. The space formed between the bar and sheet assembly is then burned with a 6% antimony-lead alloy, using oxy-acetylene torches.

The assembled anodes are electroplated using lead fluoborate, usually overnight for a 16 hour plating cycle.

2. The copper bar and lead sheet are joined on the burning table using a tin-lead alloy, and instead of using an antimony alloy, to melt into the joint fill the space in between the bar and the sheet. When the joint cools enough to solidify, the assembly is hoisted into position between the open leaves of a book mold, used to cast lead coating around the bar/sheet assembly. Once the casting has solidified, it is ready for finishing, cleaning, packaging and shipping. The casting kettle holds 2500-3500 pounds of lead and is operated at a maximum of 850° F. Lead ingots are added manually to the kettle as allowed. Dross formed on the surface is skimmed off manually and shipped to a recycling facility.
3. The copper bar is cast with lead around it before it is joined to the lead sheet. After casting, any excess lead is trimmed before the bar is transferred to the burning table. There, the lead sheet is welded to the bar by melting the edges of the sheet and casting together. Then a 6% antimony-lead alloy is melted into the joint.

After electroplating or casting, the anodes are suspended on a rack by the hanger bar and the sheet is re-straightened.

Particulate Matter (PM₁₀) and Lead emissions occur during the casting in the kettle, electroplating, tinning of the copper bar and the burning and welding of the anodes. All of these sources feature will be constructed with a hood designed to capture particulate and lead emissions. The sources will hoods vent to a cartridge dust collector which will minimize emissions to the ambient air as well as minimize minimizing employee exposure to dust and lead. The dust collector will have has a nominal control efficiency of 99%, and it will be is followed by a HEPA filter, with a control efficiency of 99.97% at 0.3 microns and larger. Even without the limitations and controls established by this permit, the facility's emissions would not trigger a requirement for a Class I/major source permit.

Lead emissions are listed as a federal Hazardous Air Pollutant (HAP). Uncontrolled potential lead emissions from the facility will not exceed the major source threshold of 10 tons per year. Calculations of lead emissions used a maximum estimated use of 3,000 pounds of lead per hour (lbs-Pb/hr) for the Anode Manufacturing process, and 20,000 pounds of lead per hour (lbs-Pb/hr) for the Rolling Mill process. While these levels would not be exceeded in practice, even doubling production, uncontrolled emissions from the facility would not exceed the major source threshold. Local HAP regulations (Chapter 7) do not apply to this facility, since operations do not fall under any of the affected Standard Industrial Classification (SIC) codes from that rule.

A complete list of equipment from which emissions are allowed by this permit is given in section 7.9 of this permit. As an informational disclosure, emissions listed in the last section of this permit entitled "Emission Inventory Table" constitute good-faith estimates of emissions subject to regulation, as set forth

in the application for permit. Additional information may be found in the Technical Support Document for this permit.

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

2. Listing of (*Federally Enforceable*) Applicable Requirements

- A. The listed specific provisions of the Pinal-Gila Counties Air Quality Control District (PGAQCD) Regulations, as adopted by the Pinal County Board of Supervisors on the dates listed, and approved by the Administrator as elements of the Arizona State Implementation Plan (SIP) by the Federal Register (FR) notice listed:

7-3-1.2 (3/31/75)	Emission Standards - Particulate Emissions - Fugitive Dust 43 FR 50531 (11/15/78)
7-3-1.1 (6/16/80)	Visible Emissions; General 47 FR 15579 (4/12/82)
7-3-1.8 (7/1/75)	Process Industries 43 FR 53034 (11/15/78)

- B. Those specific provisions of the Pinal County Air Quality Control District Code of Regulations (Code), as adopted by the Pinal County Board of Supervisors on dates listed, and approved by the Administrator as elements of the Arizona State Implementation Plan (SIP) by the Federal Register (FR) notice listed:

2-8-300 (5/18/05)	Visibility Limiting Standard 71 FR 15043 (3/27/06)
4-2-040 (6/29/93)	Fugitive Dust Standards 72 FR 41896 (08/01/07)
4-1-030 (10/28/15)	Nonattainment Area Fugitive Dust 82 FR 20267 (5/1/17)
5-24-1032 (2/22/95)	Minimum Standard of Performance – Process Particulate Emissions 77 FR 22676 (4/7/12)

- C. The National Emissions Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63, Subpart WWWW, Area Source Standards for Plating and Polishing Operations
- D. General Provisions, 40 CFR 63, Subpart A, 40 CFR 63.1-63.15 provisions as listed in Table 1 of 40 CFR 63, Subpart WWWW

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 (or permit revision) authorizes the construction of the equipment enumerated in the Subsection B of this section. That authorization rests on a findings regarding the limited emission potential of the affected equipment, coupled with the enforceable control requirements under 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 Subsection B 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 such equipment.

- B. Minor New Source Review Requirements - Equipment Authorized
[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)]

All the equipment listed under Section §9-a of this permit.

- C. Minor New Source Review Requirements - Control Requirements
[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)]; Material Permit condition [PCAQCD Code §3-1-109]

1. A dust collector/HEPA filter system with a minimum 99% capture-and-control efficiency shall be used to capture particulate matter emissions from the rolling mill operations.
2. A dust collector/HEPA filter system with a minimum 99% capture-and-control efficiency shall be used to capture particulate matter emissions from the casting kettle (anode fabrication) and casting slab mold authorized by this permit revision B30924.R02.

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 under as allowed under this permit, or by a separate permit issued by the District or other competent authority.

- C. Emissions Limitations - Lead and Particulate Matter
[Federally Enforceable Provision, pursuant to PCAQCD Code §3-1-084 (8/11/94) approved as SIP Elements at 61 FR 15717 (4/9/96)](Code §3-1-081.A)

1. Emission Cap

Permittee shall limit emissions, in any consecutive twelve-month period such that:

- a. emissions of lead do not exceed 10 tons, and;
- b. emissions of particulate matter (PM₁₀) do not exceed ~~100~~ 70 tons.

2. Emission - Process Controls

- a. The following processes shall be equipped with hoods to capture lead and particulate emissions, and such emissions will be vented to a cartridge dust collector with a nominal efficiency of at least 99% and a HEPA type filter with an efficiency of at least 99.97%:
 - 2 Casting kettles;
 - Anode electroplating;
 - Tinning of copper bar;
 - Book Molding;
 - Burning/Welding;
 - 2 Melting Kettles;
 - Casting Slab Molds.
- b. Permittee shall install a manometer or other differential pressure gauge to measure the pressure drop across the dust collector, and shall maintain the cartridge so that the pressure drop does not fall below the manufacturer's specification required to maintain the capture-and-control efficiency required by this permit. To assess the continued efficacy of the dust collector, permittee shall conduct and record daily observations of the pressure drop across the dust collector.
- c. The three (3) routers shall be equipped with cyclones to control particulate matter emissions, and the emissions from the cyclones shall be vented to the cartridge dust collector.

3. Facility-Wide Emissions

These operational limitations, in conjunction with the required controls, will limit the potential emissions of lead (Pb) to approximately one percent (1%) of the ten (10) ton single HAP major source threshold, and the emissions of particulate matter (PM₁₀) to less than one percent (1%) of the 70 ton major source threshold.

These operational limitations in conjunction with the controls required, will limit the potential to emit of lead to approximately 1% of the ten ton major source threshold and the emissions of particulate matter (PM10) to less than 1% of the 100 ton major source threshold.

D. Particulate Emissions - Opacity Limits

1. SIP Limitation
[Federally enforceable pursuant to PCAQCD Reg. 7-3-1.1 (6/16/80) approved as SIP element at 47 FR 15580 (4/12/82)] (Code §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.

Affected facilities include all anode manufacturing and the rolling mill operations, except for those fugitive emissions subject to area source NESHAPs.

- E. Particulate Emissions - Process Industries
[Federally enforceable pursuant to PGAQCD Reg. 7-3-1.8 (3/31/75) approved as a SIP element at 43 FR 50534 (11/15/78) and PCAQCD Code 5-24-1032 (2/22/95) approved as a SIP element at 77 FR 22676 (4/7/12)]

~~Permittee shall not cause or permit the emission of particulate matter into the atmosphere in any one hour from any process source, in total quantities in excess of the amount calculated by one of the following equations:~~

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 process sources having a process weight rate ("P") of 60,000 pounds per hour (30 tons per hour) or less, the maximum allowable emissions ("E") shall not exceed:

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

2. For process sources having a process weight rate ("P") greater than 60,000 pounds per hour (30 tons per hour), the maximum allowable emissions ("E") shall not exceed:

$$E = 55.0 * P^{0.11} - 40 \text{ pounds-per-hour}$$

- F. **Particulate Matter** Reasonable Precautions
[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 (7/1/75) approved as a SIP element at 43 FR 53034(11/15/78)]

1. Permittee shall not cause, suffer, allow, or permit a building or its appurtenances, subdivision site, driveway, parking area, vacant lot or sales lot, or an urban or suburban open area to be constructed, used, altered, repaired, demolished, cleared, or leveled, or the earth to be moved or excavated, or fill dirt to be deposited, without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.
2. Permittee shall not cause, suffer, allow, or permit a vacant lot, or an urban or suburban open area, to be driven over or used by motor vehicles, such as but not limited to all-terrain vehicles, trucks, cars, cycles, bikes, or buggies, without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.
3. Permittee shall not disturb or remove soil or natural cover from any area without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.

4. Permittee shall not crush, screen, handle or convey materials or cause, suffer, allow or permit material to be stacked, piled or otherwise stored without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.
5. Stacking and reclaiming machinery utilized at storage piles shall be operated at all times with a minimum fall of material and in such a manner, or with the use of spray bars and wetting agents, as to prevent excessive amounts of particulate matter from becoming airborne. Other reasonable precautions shall be taken, as necessary, to effectively prevent fugitive dust from becoming airborne.
6. Permittee shall not cause, suffer, allow or permit transportation of materials likely to give rise to fugitive dust without taking reasonable precautions to prevent fugitive dust from becoming airborne. Earth and other material that is tracked out or transported by trucking and earth moving equipment on paved streets shall be removed by the party or person responsible for such deposits.
- ~~7. Permittee shall not cause, suffer, allow or permit the use, repair, construction or reconstruction of any road or alley without taking every reasonable precaution to effectively prevent fugitive dust from becoming airborne.~~

G. Surface Stabilization

[Federally enforceable pursuant to Code §4-1-030 (10/28/15) approved as a SIP element at 82 40 CFR Part 52, FR 20267 (5/1/17)]

1. Permittee shall not cause or allow visible fugitive dust emissions from open areas / vacant lots (areas not currently 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 if silt loading is equal to or greater than 0.33 oz/ft², shall not 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.

H. Area Source National Emission Standards for Hazardous Air Pollutants

1. Plating and Polishing Operations
[Federally enforceable pursuant 40 CFR Part 63, Subpart WWWW, §§63.11507(a), 63.11507(g)]
 - a. ~~Beginning on July 1, 2010,~~ Permittee ~~shall~~ **must** use a wetting agent/fume suppressant in the electroplating tanks according to the following:
 - i. Initially add the wetting agent/fume suppressant in the amounts recommended by the manufacturer for the specific type of electrolytic process.
 - ii. Add wetting agent/fume suppressant in proportion to the other bath chemistry ingredients that are added to replenish the tank bath, as in the original make-up of the tank.
 - iii. If a wetting agent/fume suppressant is included in the electrolytic process bath chemicals used in the affected tank according to the manufacturer's instructions, it is not necessary to add additional wetting agent/fume suppressant to the tank.
 - b. ~~Beginning on July 1, 2010,~~ Permittee shall implement the following management practices for electroplating tanks and tinning baths:
 - i. Minimize bath agitation when removing any parts processed in the tank, as practicable except when necessary to meet part quality requirements.
 - ii. Maximize the draining of bath solution back into the tank, as practicable, by extending drip time when removing parts from the tank; using drain boards (also known as drip shields); or withdrawing parts slowly from the tank, as practicable.
 - iii. Optimize the design of the barrels, racks, and parts to minimize dragout of bath solution (such as by using slotted barrels and tilted tracks, or by designing parts with flow-through holes to allow the tank solution to drip back into the tank), as practicable.
 - iv. Use tank covers, if already owned and available at the facility, whenever practicable.
 - v. Minimize or reduce heating of process tanks, as practicable (e.g., when doing so would not interrupt production or adversely affect part quality).

- vi. Perform regular repair, maintenance, and preventative maintenance on racks, barrels, and other equipment associated with affected sources, as practicable.
 - vii. Minimize bath contamination, such as through the prevention or quick recovery of dropped parts, use of distilled/de-ionized water, water filtration, pre-cleaning of parts to be plated, and thorough rinsing of pre-treated parts to be plated, as practicable.
 - viii. Maintain quality control of chemicals, and chemical and other bath ingredient concentrations in the tanks, as practicable.
 - ix. Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and periodic washdowns, as practicable.
 - x. Minimize spills and overflow of tanks, as practicable.
 - xi. Use squeegee rolls in continuous or reel-to-reel plating tanks, as practicable.
 - xii. Perform regular inspections to identify leaks and other opportunities for pollution prevention.
- c. ~~Beginning on July 1, 2010,~~ Permittee shall also comply with the requirements from 40 CFR Part 63, Subpart A, General Provisions listed in Table 1 of 40 CFR 63, Subpart WWWW.

I. General Maintenance Obligation

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

At all times, including periods of start-up, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate the permitted facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.

5. Compliance Demonstration

A. Regular Emissions Monitoring and Recordkeeping -PM₁₀

[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. Since the emissions authorized under this permit constitute a direct function of the lead used, Permittee shall maintain records of the amount of lead used to manufacture anodes per month, specifying whether it is lead sheets or lead in the tanks. Also, Permittee shall maintain monthly records of the amount of lead used in the rolling mill operations.
2. Since the dust collector and HEPA filter are required to limit the emissions authorized under this permit, Permittee shall:
 - a. Keep records of manufacturing data for the dust collector and HEPA filter verifying their design control efficiencies;
 - b. Operate and maintain the dust collector in accordance with the manufacturer's specifications, which shall be kept on site, and maintain records of the maintenance operations; and

- c. Maintain a log, documenting the date and time of any upset that caused a malfunction of the dust collector.

B. Opacity monitoring
[Federally Enforceable 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)]

On at least a semi-annual basis, Permittee shall conduct a visual opacity screen performed on the dust collector stack. If visible emission are observed, Permittee shall have a full Method 9 opacity test performed by a certified opacity observer, and shall provide a copy of the resulting report to the District within 10 days of first observing visible emissions.

C. Continuous Compliance Monitoring for Plating and Polishing Operations Area Source NESHAP
[Federally enforceable pursuant 40 CFR Part 63, Subpart WWWW] [40 §63.11508(d), 40 §63.11509(e)]

~~Beginning on July 1, 2010:~~

1. Permittee shall always operate and maintain the affected source, including air pollution control equipment;
2. Permittee shall prepare an annual certification as required by ~~§4.L~~ §5.K of this permit and keep it in a readily-accessible location for inspection review.
3. Permittee shall record the addition of wetting agent/fume suppressant to the tank bath in the original make-up of the tank;
4. For tanks where the wetting agent/fume suppressant is a separate purchased ingredient from the other tank additives, permittee shall demonstrate continuous compliance in accordance with the following:
 - a. Permittee shall add wetting agent/fume suppressant in proportion to the other bath chemistry ingredients that are added to replenish the tank bath, as in the original make-up of the tank.
 - b. Permittee shall record each addition of the wetting agent/fume suppressant to the tank bath.
5. Permittee shall state in the annual compliance certification required by this permit that the wetting agent/fume suppressant was added to the bath according to manufacturer's specifications and instructions.

D. ~~Initial~~ Compliance Requirements for Plating and Polishing Operations Area Source NESHAP
[Federally enforceable pursuant 40 CFR Part 63, Subpart WWWW, §63.11508(c)]

In order to demonstrate ~~initial~~ compliance with the standards of ~~§3.H.2~~ §4.C of this permit, Permittee shall:

1. Add wetting agent/fume suppressant to the bath of each affected tank according to the manufacturer's specifications and instructions, and state this fact in the Notification of Compliance Status.
2. Implement the applicable management practices specified in ~~3.H.2~~ §4.C of the permit and state this fact in the Notification of Compliance Status.

- E. Melting Kettle Stacks (East and West) Visual Observations
[Federally Enforceable 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)]

On a monthly basis, Permittee shall conduct a visual observation of the East and West melting kettle stacks for any outside discoloration. If any discoloration is observed, Permittee shall conduct an inspection of the melting kettle structure to ensure there are no leaks. Records of observations, kettle inspections and any actions taken shall be kept and available to the District if requested.

- F. Recordkeeping
[Federally enforceable provision, pursuant to Code §3-1-084 (8/15/94) and §3-1-083 (2/22/95) approved as a SIP element at 65 FR 79742 (12/20/00)]

Permittee shall maintain records of:

1. All information required pursuant to any federally enforceable 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.”
3. Plating and Polishing Operations Area Source NESHAP
[Federally enforceable pursuant 40 CFR Part 63, Subpart WWWW][40 §63.11509(e)]

Permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. Permittee shall keep each record onsite for at least 2 years. These records shall include:

- a. A copy of the Initial Notification and Notification of Compliance Status that you submitted and all documentation supporting those notifications.
 - b. The records specified in 40 CFR §63.10(b)(2)(i) through (iii) and (xiv) of the General Provisions.
 - c. The records required to show continuous compliance with each applicable management practice as specified in §3.H.2.
- G. Testing
[Federally Enforceable 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

~~Within this permit's term, but no longer than 5 years from the previous test,~~ Permittee shall conduct performance tests on the exhaust of the dust collector that controls emissions from the casting kettle, anode electroplating, tinning of copper bar, book molding and burning/welding operations, to quantify the concentration of lead and particulate matter from the stack during operations. Reference Method 12 in 40 CFR Part 60, Appendix A, or another test approved by the Control Officer shall be used to determine the lead and particulate matter concentration. Tests shall be conducted at the facility's maximum capacity.

2. Rolling Mill Testing

~~Within this permit's term, but no longer than 5 years from the previous test,~~ Permittee shall conduct a performance test on the exhaust of the dust collector that controls emissions from the rolling mill operations. Permittee shall conduct this test while the rolling mill is alone operating or suggest a method to break out the emissions from this operation in the test protocol. The test shall determine the lead and particulate matter concentration.

3. Test Protocols

Test protocols shall be submitted to the District for approval at least **thirty (30)** ~~sixty (60)~~ days prior to the test. The test protocol shall quantify the rate of lead emissions as well as emissions as a function of the amount of lead used in the process (lb/lb).

4. Performance Test Notice

Notice of performance tests required by this permit shall be submitted to the District at least **thirty (30)** ~~fourteen (14)~~ days prior to running the test.

5. Test Report

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

6. **Recurring Testing**

Within five years of the previous performance test, Permittee shall conduct a performance test as required in Section §5.G.1 of this permit.

H. 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)]

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, clearly showing 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 the report.

I. Semi-annual Reporting and Certification Requirements for Plating and Polishing Operations Area Source NESHAP

[Federally enforceable pursuant 40 CFR Part 63, Subpart WWWW, §63.11518(c)]

The semi-annual compliance reports and annual certification required by §4.I and §4.M of this permit shall contain:

1. A record of the addition of wetting agent/fume suppressant;
2. A statement that you have implemented the applicable management practices, as practicable, and;
3. Any deviations from the compliance requirements along with the corrective action taken.

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)]

Permittee shall annually submit to the Director and the Administrator of the US EPA a certification of compliance with the provisions of this permit. The certification shall:

1. Be signed by a responsible official, namely the proprietor, a general partner, the president, secretary, treasurer or vice-president of the corporation, or such other person as may be approved by the Control Officer as an administrative amendment to this permit;
2. Acknowledge that the product-use limitations under this permit constitute an emissions limitation;
3. Verify whether or not Permittee has complied with respect to the product use limitations under this permit;
4. Verify whether compliance with respect to each such term or condition has been continuous or intermittent;
5. Verify that the compliance certification is based upon records documenting compliance with the product use limitations under this permit; and
6. Be postmarked within thirty (30) days of the start of each calendar year.

K. Annual Compliance/Compliance Progress Certification for Plating and Polishing Operations
[Federally enforceable pursuant 40 CFR Part 63, Subpart WWWW] [40 §63.11509(c)]

By January 30 of each year, Permittee shall prepare annual certification of compliance report in accordance to 40 CFR §63.11509(c) and keep it in a readily accessible location for inspector review. These reports do not need to be submitted to the District unless a deviation from the requirements of this permit has occurred during the reporting year, in which case, the annual certification shall be submitted along with the deviation report. This annual certification shall be submitted at the same time as the Annual Regular Compliance Certification required by §4.L. of this permit.

6. Other Reporting Obligations

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)]

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 code §3-1-083 (2/22/95) approved as a SIP Element at 65 FR 79742 (12/20/00)]~~

~~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 fifteen (15) days of such date; and~~
3. ~~The actual date of start up; notice shall be sent within fifteen (15) days after such date.~~

- 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. Submittal of the form set forth in Appendix A of this permit by January 30th of each year fulfills this requirement.

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 §§3-1-081.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 (8/11/94)*]

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

comment upon the continued "federal enforceability" of the subject provision after the proposed change.

M. Permit Re-opening
(Code §3-1-087)

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

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

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

O. Scope of License Conferred
(Code §3-1-081.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, Code §8-1-030)

1. To the extent Permittee may wish to offer a showing in mitigation of any potential penalty, underlying upset events resulting in excess emissions shall reported as follows:
 - a. The permittee shall report to the Control Officer any emissions in excess of the limits established by this permit. Such report shall be in two parts:
 - i. Notifications by telephone or facsimile within 24 hours or the next business day, whichever is later, of the time when the owner or operator first learned of the occurrence of excess emissions, including all available information required under subparagraph b. below.
 - ii. Detailed written notification within 3 working days of the initial occurrence containing the information required under subparagraph b. below.
 - b. The excess emissions report shall contain the following information:
 - i. The identity of each stack or other emission point where the excess emissions occurred.

- ii. The magnitude of the excess emissions expressed in the units of the applicable limitation.
 - iii. The time and duration or expected duration of the excess emissions.
 - iv. The identity of the equipment from which the excess emissions occurred.
 - v. The nature and cause of such emissions.
 - vi. If the excess emissions were the result of a malfunction, steps taken to remedy the malfunction and the steps taken or planned to prevent the recurrence of such malfunctions.
 - vii. The steps that were or are being taken to limit the excess emissions. To the extent this permit defines procedures governing operations during periods of start-up or malfunction, the report shall contain a list of steps taken to comply with this permit.
 - viii. To the extent excess emissions are continuous or recurring, the initial notification shall include an estimate of the time the excess emissions will continue. Continued excess emissions beyond the estimated date will require an additional notification.
2. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
 3. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of the following subparagraph are met.
 4. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - b. The permitted facility was at the time being properly operated;
 - c. During the period of emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
 - d. The permittee submitted notice of the emergency to the Control Officer by certified mail or hand delivery within 2 working days of the time when emissions limitations were exceeded due to emergency. The notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective action taken.

9. Equipment

A. Equipment

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

1. (3) - Routers Equipped with Cyclones
2. Roller/Leveler
3. (7) - Burning Tables
4. Tinning Bath (Cu Anodes) – 12 gallons
5. Tinning Bath (Zn Anodes) – 12 gallons
6. Zinc Chloride Bath (Cu Anodes) – 24 gallons
7. Zinc Chloride Bath (Zn Anodes) – 24 gallons
8. Book Mold
9. (2) - Casting Kettles – 2,500 to 3,500 lbs of Pb, 55 gallons each
10. (12) - Plating Tanks – 238 gallons each
11. (4) - Washing Tanks 157 gallons each
12. (2) - Melting Kettles – 678 gallons each
13. (2) - Casting Slab Molds – 39 gallons each
14. Dust Collector / HEPA Filter – 99% Control Efficiency

B. Insignificant Activities

1. Wet Sander

C. Emission Inventory Table

Source	Pollutants	Emission Rate (tons/yr)
Baghouse Emissions Dust Collector	Particulate Matter (PM ₁₀)	5.44E-05
	Hazardous Air Pollutants (HAPs) – Lead (Pb)	1.54E-05
Fugitive Sources Emissions	Particulate Matter (PM ₁₀)	4.50E-04
	Hazardous Air Pollutants (HAPs) – Lead (Pb)	3.72E-04
Fuel Burning Equipment Combustion Emission	Particulate Matter (PM ₁₀)	2.0E-01
	Hazardous Air Pollutants (HAPs) – Lead (Pb)	2.0E-03
	Nitrous Oxides (NO _x)	2.63
	Carbon Monoxide (CO)	2.19
	Volatile Organic Compounds (VOC)	0.15
	Sulfur Oxides (SO _x)	0.39

Totals	Particulate Matter (PM ₁₀)	0.20
	Hazardous Air Pollutants (HAPs) – Lead (Pb)	2.39E-03
	Nitrous Oxides (NO _x)	2.63
	Carbon Monoxide (CO)	2.19
	Volatile Organic Compounds (VOC)	0.15
	Sulfur Oxides (SO _x)	0.39

Appendix A: Semi-annual Report

Permit ~~B31251.000~~ B31406.000

Abstract

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

Facility - **Ecobat Resources Arizona, LLC**
~~Quemetco Metals Arizona~~
602 North Swanson Street, Casa Grande, AZ

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

Material Report

Amount of lead used in anode manufacturing- _____ pounds

Amount of lead used in rolling mill - _____ pounds

Operations Report

Have the manometer readings required by §4.C.b been recorded?..... YES / NO

~~Have open and vacant areas been stabilized as required by §4.G?..... YES / NO~~

~~Have the applicable management practices of §§4.H.1 been implemented?..... YES / NO~~

~~Have there been any deviations to the management practices?..... YES / NO~~

Have records of lead usage and dust collector operations as required under §5.A.1 been maintained?..... YES / NO

Were the opacity screenings required under §5.B conducted? YES / NO

Were any Method 9 readings required as described in §5.B?..... YES / NO

If yes did any Method 9 test exceed 20% opacity?..... YES / NO / NA

Have records of wetting agent / fume suppressant been maintained as required by §5.C? YES / NO

Were the monthly observations of the melting kettle stacks conducted as required by §5.E?..... YES / NO

Were the records required by §5.F maintained? YES / NO

Has testing been completed on the dust collectors within the last 5 years as required by §5.G? YES / NO

Certification by Responsible Official

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

Signed _____

Printed Name _____

Title _____

Date _____

Contact Phone Number _____

Email to - compliancereports@pinal.gov, or

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

Monthly Usage Report

Month _____ Year _____

Lead Sheets Processed during Month _____ lbs

Lead added to Plating Bath during Month _____ lbs

Lead used in Book Mold Casting Kettles _____ lbs

Lead used in Burning Operations _____ lbs

Lead-tin Alloy used in Tinning Baths _____ lbs

Total Lead used in Anode Manufacturing _____ lbs

Lead used in Rolling Mill Kettles _____ lbs

Report Prepared by _____ Date _____