

Technical Support Document (TSD)

I. General Comments:

A. Company Information

1. S.R. Smith, L.L.C. (Formerly Inter-Fab, Inc.)
2. 3050 S. Alvernon Way, Tucson, AZ 85713

B. Background

This source was issued a 5-year permit in February 2002 which was structured in anticipation of the now promulgated Maximum Achievable Control Technology (MACT) (WWWW – Reinforced Plastic Composites Production, promulgated April 21, 2003). This renewal streamlines the existing voluntary limits with the MACT rules wherever possible. See discussion below in “D. Renewal Approach.” The source has three primary processes addressed by the permit: Reinforced Plastic Composites Production (RPCP), Adhesives and Activators (AA), and Surface Coating Operations (SCO).

C. Attainment Classification

This source is located in an area which is attainment for all pollutants.

D. Renewal Approach

The objective of this renewal was to introduce all applicable regulations of WWWW into an existing permit without disturbing too much of the existing language. The renewal was done this way because the Permittee did not seek to revise/ change the various synthetic minor limitations (SMLs) established in the original permit. Wherever possible, the existing standards were retained without change.

S.R. Smith, L.L.C. has accepted a synthetic minor limitation to remain below 100 TPY for HAPs to avoid other applicable requirements of WWWW which would subject the source to more stringent work practice standards and controls. With S.R. Smith accepting to remain below 100 TPY for HAPs, this indirectly classifies them as a synthetic minor for VOCs since the controls on HAPs minimize VOCs as well.

In cases where the existing SML is more stringent than the MACT, the MACT standard and SML have been streamlined. For example, in Condition 36.a.vi – some applicable MACT standards that allow HAP contents in excess of the SMLs previously established were streamlined in order to avoid confusion with the SML. Provision for facility change notifications and permit revisions have added to the existing SML to allow compliance with the applicable MACT should the product line change or a need arise during the permit term.

In other cases, a new MACT standard would overlap with an existing standard which covered all processes. In such cases the new standard was introduced for RPCP and the existing standard was dedicated solely to AA and SCO. For example, the Monitoring and Recordkeeping requirement in Condition 42.a originally covered MSDS tracking for all operations. As the MACT required more detailed MSDS tracking, the MACT standard was included and the existing standard was dedicated to AA and SCO.

SML limits which had previously been accepted by the source to remain below major source thresholds of VOC now also serve to avoid the WWWW MACT for sources emitting greater than 100 tpy of HAPs (40 CFR 63.5805.(b)).

Finally, monitoring and recordkeeping requirements that addressed RPCP, AA, and SCO were not separated (as they were in § 4, as this would have required too many administrative amendments in order to do nothing more than separate conditions merely for organizational purposes. Throughout the permit the phrase “All Operations” refers to all operations, even those covered previously.

II. Source Description

A. Process Description

S.R. Smith, L.L.C.'s – Tucson Facility produces diving boards and pool slides for swimming pools. Wet coating, (using various types of paints), of various acrylic-fiberglass composite products is may also be conducted on site as part of the production process. For the diving board processes, some of the resin and gel-coat is applied manually with some being applied using flow coating equipment and techniques. The closed molding process uses spray application for the gel coating. The primary pollutant of concern is styrene, which is both a VOC and a HAP and is found in both the resins and the gel coats. None of the resins or gel coats used contains a vapor suppressant. Acetone is also used as the primary clean-up solvent at the facility.

S.R. Smith, L.C.C. is an existing major source of a single HAP (styrene), a major source of a combination of HAPs (chiefly styrene and MMA), a synthetic minor source of VOC, and a true minor source of all other criteria pollutants.

The facility operates six paint booths, and a number of woodworking dust collector systems. The company operates primarily Monday through Friday, 8 hours per day (2080 hrs), with a second shift being utilized in the summer months (May-August). Operating hours in summer months are usually Monday through Saturday, 10 hr days (1080 additional hours). ~ 35% capacity vs 8760 hours per year.

B. Air Pollution Control Equipment

There are no add-on air pollution controls required by the permit.

III. Regulatory History

A. Testing & Inspections

Inspections have occurred regularly. Full compliance inspections were conducted in July 2017, and July 2019. No compliance deficiencies were noted and the facility was found to be in substantial compliance with the terms and conditions of the permit and Title 17 of the PCC.

B. Excess Emissions

None

IV. Emissions Estimates

Emissions estimates are based on the renewal application dated August 16, 2019. For closed molding operations, the emission factor provided in AP-42 shall be used for emission estimates. The use of both Polyurea and Polyurethane have been determined to have insignificant emissions in previous determinations and so emission calculations for those products were not done in this renewal and may be addressed through facility change notifications and/or revisions should the need arise due to future product changes.

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

Table 1 – Emission Estimates

Emission Source – Operation	Controlled Facility-Wide Regulated Pollutant Emissions (tons/yr)								
	PM ₁₀	PM _{2.5}	NO _x	SO ₂	CO	VOC	HAP Total	HAP Styrene	HAP MMA
Reinforced Plastics Operations									
Resin Usage – Closed Molding Based on 10% of allowed resin usage (100 tons) 40% max. HAP; EF = .4*.03*2000 = 24 lb/ton						1.20	1.20	1.20	-
Resin Usage – Open Molding Based on 90% of allowed resin usage (876 tons) 35% max HAP; EF = 94 lb/ton	-	-	-	-	-	41.18	41.18	41.18	-
Gel Coat Application & Usage Based on of allowed gel coat usage (361,771 pounds) 305,241 lb @ 289 lb/ton – Infusion - Non-atomized (84.4) 56,530 lb@411 lb/ton; Open Molding-Atomized (15.6%) Max Comp. – Spray application; EF = 469 lb/ton						37.17	37.17	30.39	6.78
Adhesives & Activators Operations									
Based on allowed adhesive and Activator usage 6000 gal.; 0.44 lb/gal adhesive; 3.2 lb/gal activator						2.28	2.28	-	2.28
Surface Coating Operations									
Based on allowed Paint Usage of 2400 gallons @ 6.0 lb VOC/HAP per Gallon						7.20	7.20	-	-
Other Facility Operations									
Wood Shop Dust Collectors & Router Dust Collectors (68,000 cfm) (Emissions estimate for baseline only) ¹	8.91 ¹	8.91 ¹	-	-	-	-	-	-	-
Totals	8.91 ¹	8.91 ¹	-	-	-	89.03	89.03	72.77	9.06

¹ Note: These emissions estimates have been determined by the Control Officer to be insignificant.

PM₁₀ emissions from woodworking dust collection systems:

The Control Officer has determined the particulate matter emissions from wood processing operations at the facility to be insignificant pursuant to PCC 17.04.340.A.114.j. The Permittee has not historically been required to monitor or test installed filtered exhaust vent systems for the particulate matter emission rate. Since the Control Officer has determined the PM₁₀ emissions from wood processing operations to be insignificant, the Permittee is currently not required to estimate these emissions for the purpose of calculating an emission fee.

Basis:

The only applicable PM₁₀ standard for the exhaust vents would be the County SIP grain loading standard which is equal to 0.2 grains/scf. At this standard the allowable estimated rate would be on the order of 175 tons/yr at 3060 hours of operation. This standard is an excessive overestimation of the emissions expected from these vents, and the vent would exhibit opacity well before approaching this rate of emission. Also the source has not historically exhibited opacity from these operations.

A lower range estimate for the facility was derived pursuant to the AP-42, Table 10.9-7,9 emission factor for wood processing equal to 1.152 lb PM₁₀/1000 cubic feet of lumber processed. A dedicated lumber handling facility with a throughput of 5,000,000 cubic feet, which is far in excess of the facility’s yearly lumber throughput, would yield approximately 2.88 tons/yr of PM₁₀ from its filtered facility exhaust vents.

An upper range screening factor of 0.01 grains/scf was used to estimate the baseline emissions from filtered wood dust collector operations. With an exhaust capacity of 68,000 scfm and 3060 average hours of operation per year, the estimate yields approximately 8.91 tpy of PM₁₀.

With an estimated PM₁₀ emission rate ranging between 2.8 and 8.9 tpy, below the 10 tpy significance level for this pollutant, the Control Officer has determined the current configuration of the wood handling operations to be insignificant and included these PM₁₀ estimates in the facility summary of this permit only for use as a baseline estimate for the facility.

Should the Control officer have reason to believe the PM₁₀ emission rate is in violation of an applicable standard, or otherwise require it to be quantified or monitored as a result of a facility change, the Control Officer may require the Permittee to conduct representative stack testing to determine an emission rate.

V. Insignificant Activities

For the purpose of the permit, equipment or operations in Table 2 below have been determined by the Control Officer, because of their size or production rate, to be de-minimus emission sources and/or insignificant activities in accordance with PCC 17.04.340.A.114.j. For other changes or activities the Permittee shall follow the facility change provisions in accordance with Condition 16.d of the permit as applicable.

Table 2: Insignificant Activities

Description	Maximum Rated Capacity	Fuels Used or Materials Affected	
1) Landscaping, building maintenance, or janitorial services.			
2) The following Gasoline and Volatile Organic liquid (VOL) Storage Tanks: <ul style="list-style-type: none"> - All gasoline storage tanks less than 250 gallons capacity provided they otherwise comply with <u>40 CFR 59, Subpart F</u> , - Gasoline storage tanks greater than 250 gallons and less than 10,000 gallons with a throughput less than 1000 gallons per month, provided such tanks are equipped with a submerged filling device, or acceptable equivalent, for the control of hydrocarbon emissions in accordance with <u>PCC 17.16.230.B</u> - Gasoline storage tanks less than 10,000 gallons capacity provided they are not otherwise required to meet <u>NESHAP Subpart CCCCCC</u>. - All volatile organic liquid (VOL) tanks less than 10,000 gallons provided they comply with Condition 39.c of the permit. 	V ≤ 10,000 gal.	Gasoline or VOL	
3) Petroleum liquids storage tanks and VOL storage tanks with the following volume (V) capacities and stored liquid vapor pressure ranges, provided that the facility maintains a file of each type of petroleum liquid and/or VOL stored, dates of storage, and the typical Reid vapor pressure of each type of petroleum liquid stored, and for those petroleum liquids storage tanks > 40,000 gallons the average monthly storage temperature and true vapor pressure is determined and recorded. Statements from the fuel supplier showing the fuels delivered to such vessels shall be acceptable.		Petroleum liquid or VOL	
Cutoff for monitoring per <u>PCC 17.16.230.E.2</u> and/or <u>NSPS Subpart Kb</u> : <ul style="list-style-type: none"> a) Petroleum Liquids and/or VOL with a max. true vapor pressure < 0.50 psia (3.5 kPa) under actual storage conditions. 		All sizes	Petroleum liquid and VOL
<ul style="list-style-type: none"> b) VOL with a max true vapor pressure < 2.17 psia (15 kPa) under actual storage conditions 		V > 10K gal. V < 40K gal.	VOL
4) Dedicated Diesel, Fuel Oil, or Jet A storage tanks		All sizes	Diesel, Fuel Oil, and Jet A
5) Batch mixers.		5 cu ft. or less	
6) Wet sand and gravel production facilities whose permanent in-plant roads are paved and cleaned to control dust. This does not include activities in emissions units which are used to crush or grind any nonmetallic minerals.			

Table 2: Insignificant Activities

Description	Maximum Rated Capacity	Fuels Used or Materials Affected																					
7) Hand-held or manually operated equipment used for buffing, polishing, carving, cutting, drilling, machining, routing, sanding, sawing, surface grinding, or turning of ceramic art work, precision parts, leather, metals, plastics, fiberboard, masonry, carbon, glass or wood. Including the following: Facility-Wide small commercial abrasive blasting cabinets provided they are equipped and maintained with filtration control devices. For the purpose of this activity, small cabinets are defined to be cabinets not designed to allow persons inside the cabinet while in use.																							
8) Powder coating operations																							
9) Internal combustion (IC) engine – driven compressors, IC engine-driven electrical generator sets, and IC engine-driven water pumps used only for emergency replacement or standby service. Notes: Portable or temporary internal combustion engines (ICE) or non-road engines that operate, or are planned for operation, at a fixed location for more than 12 months shall be subject to stationary source permitting requirements. Portable ICE used or located at a facility, may be required to keep records to document when the ICE is transferred to or from the facility, or alternate locations at the facility, and/or storage areas in order to establish that the unit is not subject to stationary permitting requirements. Portable ICE that are used to replace a stationary ICE at a fixed location and intended to perform the same or similar function shall include the operating time at the location of both engines to determine the consecutive time period for purposes of stationary ICE permitting. Notwithstanding the requirement to permit stationary ICE, a portable ICE shall not be required to meet the NSPS or NESHAP ICE standards for stationary sources when used as an emergency replacement or as a standby unit, while the facility effects repairs, or while ordering a replacement unit, unless the Permittee intends for the portable ICE to be permanent replacement unit at that location. Portable ICE used to replace a stationary permitted ICE shall be limited by the same run hour limits (if any) applicable to the unit being replaced at that site location. The balance of the permitted allowable run hours allotted to the stationary ICE shall continue to accrue with the operation of the replacement unit. When used for this specific purpose, the permittee shall be required to keep records of the run hours and emissions of the portable ICE for emission inventory purposes.																							
10) Lab equipment used exclusively for chemical and physical analyses.																							
11) Trivial activities as defined in <u>PCC 17.04.340.a.237 a through xx</u> .																							
12) Particulate matter emissions from filtered wood shop and process areas and dust collector exhaust vents at a capacity of 68,000 scfm. Estimates in the PTE summary are upper range estimates of the facility baseline. (See Section IV and Note 1 to Table 1 of this TSD For discussion of emission factors used).																							
13) The <u>Control Officer</u> has deemed the following portable sources located at a facility and having a combined capacity less than the amount listed below in its FBE class to be an insignificant activity per PCC 17.04.304.A.114.j. As such the facility shall not be required to maintain documentation of such portable equipment to demonstrate their portable source status: <table border="1" data-bbox="565 1423 1370 1692" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th><u>Fuel Burning Equipment (FBE) Class</u></th> <th><u>Combined Capacity</u></th> <th><u>Comments</u></th> </tr> </thead> <tbody> <tr> <td>Diesel Fired Engines ¹</td> <td>75 hp</td> <td>-</td> </tr> <tr> <td>Gasoline Fired Engines ¹</td> <td>215 hp</td> <td>-</td> </tr> <tr> <td>Natural Gas Fired Engines ²</td> <td>80 hp</td> <td>-</td> </tr> <tr> <td>Natural Gas Fired Fuel Burning Equipment ²</td> <td>23 MMBtu/hr</td> <td>-</td> </tr> <tr> <td>LPG Fired Fuel Burning Equipment ²</td> <td>15 MMBtu/hr</td> <td>-</td> </tr> <tr> <td>Diesel Fired Fuel Burning Equipment ²</td> <td>4.5 MMBtu/hr</td> <td>-</td> </tr> </tbody> </table> <p data-bbox="167 1713 1516 1829"> ¹ Does not include non-road engines in or on a piece of equipment that is self-propelled or engines that serve a dual purpose by both propelling itself and performing another function; or is intended to be propelled while performing its function (examples: engine powered equipment used on utility vehicles, garden tractors, off-highway mobile cranes and bulldozers; or engines that can be moved by hand such as lawnmowers, string trimmers et. al.). </p> <p data-bbox="167 1839 1354 1871"> ² Does not include sources that are by definition insignificant or trivial activities pursuant to PCC 17.04.340.A.(114) & (237). </p>			<u>Fuel Burning Equipment (FBE) Class</u>	<u>Combined Capacity</u>	<u>Comments</u>	Diesel Fired Engines ¹	75 hp	-	Gasoline Fired Engines ¹	215 hp	-	Natural Gas Fired Engines ²	80 hp	-	Natural Gas Fired Fuel Burning Equipment ²	23 MMBtu/hr	-	LPG Fired Fuel Burning Equipment ²	15 MMBtu/hr	-	Diesel Fired Fuel Burning Equipment ²	4.5 MMBtu/hr	-
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V. Applicable Requirements

Title 40 of the Code of Federal Regulations Part 60:

Appendix A Test Methods

Title 40 of the Code of Federal Regulations Part 63:

Subpart A NESHAP: General Provisions

Subpart WWWW NESHAP: Reinforced Plastics Composites Production

State Implementation Plan, Pima County:

Regulation 11 Jurisdiction (inclusive)

Regulation 22 Conditions of the Permit (inclusive)

Regulation 23 Denials of Permit Applications (inclusive)

Regulation 24 Permit Fee Schedule/Non-Fee Requirements(inclusive)

Regulation 25 Permit Fee Schedules Adjustments(inclusive)

Regulation 26 Inspections (inclusive)

Rule 261 Compliance Inspections

Regulation 30 Prohibited Acts

Rule 301 Planning, Construction, or Operating without a Permit

Rule 302 Non-Compliance with Applicable Standards

Regulation 31 Design or Work-Practice Control Standards

Rule 314 Petroleum Liquids

Rule 315 Roads and Streets

Rule 316 Particulate Materials

Rule 318 Vacant Lots and Open Spaces

Regulation 32 Emissions-Discharge Opacity Limiting Standards

Rule 321 Standards and Applicability (Includes NESHAP)

Regulation 33 Emissions-Discharge Mass Limiting Standards

Rule 331 Applicability

Rule 332 Compilation of Mass Rates and Concentrations (NESHAPS)

Regulation 34 Ambient-Air Standards

Rule 341 Applicability

Rule 342 Mass-Concentration Ceilings

Rule 343 Visibility Limiting Standard

Rule 344 Odor Limiting Standards

Regulation 50 Periodic Testing

Rule 501 Applicability of Methodology

Rule 502 Testing Frequency

Rule 503 Notification; Fees

Rule 504 Pre-Installation Testing or Modeling Requirements (for new major source)

Rule 505 Sampling and Testing Facilities

Rule 506 Stack Sampling

Regulation 61 Recordkeeping Requirements

Rule 611 Recordkeeping for Compliance Determinations

Rule 612 Recordkeeping for Emission Inventories

Regulation 62 Reporting Requirements

Rule 621 Reporting for Compliance Evaluations

Rule 622 Reporting as a Permit Requirement

Rule 623 Reporting for Emission Inventories

Regulation 63 Available Information

Rule 631 Confidentiality of Trade Secrets, Sales Data, and Proprietary Information

Pima County Code (PCC) Title 17, Chapter 17.04 – General Provisions (inclusive)

Pima County Code (PCC) Title 17, Chapter 17.08 – Ambient Air Quality Standards (inclusive)

Pima County Code (PCC) Title 17, Chapter 17.11 – General Provisions for Permits

- 17.11.010 Statutory Authority
- 17.11.020 Planning, constructing, or operating without a permit
- 17.11.060 Permit display or posting
- 17.11.070 Public records – Confidentiality
- 17.11.080 Permit shield
- 17.11.090 Applicability – Classes of permits
- 17.11.120 Material Permit Condition
- 17.11.160 Test methods and procedures
- 17.11.190 Permits containing synthetic emission limitations and standards
- 17.11.210 Performance tests

Pima County Code (PCC) Title 17, Chapter 17.12 – Individual Permits and Permit Revisions for Class I Permits

- 17.12.010 Permit application processing procedures for Class I permits
- 17.12.040 Permit contents for Class I permits
- 17.12.080 Compliance plan – Certification for Class I permits
- 17.12.090 Facility changes allowed without permit revisions
- 17.12.100 Administrative permit amendments
- 17.12.110 Minor permit revisions
- 17.12.120 Significant permit revisions
- 17.12.130 Reopening, revocation, reissuance, or termination for Class I permits
- 17.12.140 Permit renewal and expiration
- 17.12.160 Annual emissions inventory questionnaire
- 17.12.170 Excess emissions reporting requirements for Class I permits
- 17.12.180 Affirmative defenses for excess emissions due to malfunctions, startup, and shutdown
- 17.12.220 Fees related to Class I permit

Pima County Code (PCC) Title 17, Chapter 17.16 – Emission Limiting Standards

- 17.16.010 Local rules and standards – Applicability of more than one standard
- 17.16.020 Noncompliance with applicable standards
- 17.16.030 Odor limiting standards
- 17.16.040 Standards and applicability (includes NESHAP)
- 17.16.050 Visibility limiting standard
- 17.16.130 Applicability

Pima County Code (PCC) Title 17, Chapter 17.20 – Emission Source Testing and Monitoring

- 17.20.010 Source sampling, monitoring, and testing
- 17.20.040 Concealment of emissions

Pima County Code (PCC) Title 17, Chapter 17.24 – Emissions Source Recordkeeping and Reporting

- 17.24.020 Recordkeeping for compliance determination
- 17.24.030 Recordkeeping for emission inventories
- 17.24.040 Reporting for compliance evaluations
- 17.24.050 Reporting as a permit requirement
- 17.24.060 Reporting for Emission inventories
- Article IV Penalty for Noncompliance

Pima County Code Title 17, Chapter 17.28 – Violations and Conditional Orders

Article I – Violations (inclusive)

Article II – Conditional Orders (inclusive)

Article III – Circumvention (inclusive)

NON-Federally Enforceable Regulations:

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

17.16.400 Organic Solvents and Other Organic Materials

17.16.430 Standards of Performance for Unclassified Sources

VI. Permit Contents

Each standard will be addressed relative to the corresponding standards in the previous permit. Numbers refer to the Conditions in Part B of the permit.

§ 1: Authority, Classification, and Permit Organization

26. – 30. Statutory Authority; Permit Classification; Permitted Sources and Permit Sections added

This is a Class I Stationary Source for a single HAP (styrene) and a combination of HAPs (chiefly styrene and methyl methacrylate); a synthetic minor source of VOC and a true minor of all other pollutants. The three primary processes which are specifically covered by the permit are Reinforced Plastic Composites Production, Adhesives, and Surface Coating Operations.

§ 2: Applicability

- 31. Sources subject to NESHAP Subpart WWWW – conditions relating affected sources, exclusions.
- 32. All Operations – sources subject to Title 17 of the PCC

§ 3: Definitions

Applicable permit definitions

§ 4: Emission Limitations and Standards

Voluntary Limitations

- 36.a Reinforced Plastic Composites Production
 - 36.a.ii Resin and Gel Coat usage limits remain unchanged based on 10-03-2006 application.
 - 36.a.iii Resin application limited to non-atomized spray remain unchanged based on 10-03-2006 application.
 - 36.a.vi The resin HAP content limits have remain unchanged to reflect open-molding or closed-molding limits and streamlining with the NESHAP Subpart WWWW HAP limitations.
 - 36.a.vii The gel coat HAP content limits have remained unchanged to reflect the 10-03-2006 application and streamlining with the WWWW HAP limitations. The application requested that Infusion gelcoat application be atomized. This use amounts to approx. 361, 771 lbs. of Valspar per 12-month rolling total based on ~ 77% use of Valspar gelcoats from the maximum potentials declared in the application.
- 36.b Adhesives & Activators voluntary limits remain unchanged based on 10-03-2006 application.
 - 36.b.i Adhesive usage limit unchanged. Adhesive HAP/VOC content limit unchanged – see definition.
 - 36.b.ii Activator usage limit unchanged. Activator HAP/VOC content limit unchanged – see definition.
- 36.c Surface Coating Operations voluntary limits
 - 36.c.i Paint usage limits unchanged
 - 36.c.ii Paint VOC and HAP content limits unchanged
- 36.d All operations – added for installation of additional equipment and operations covered by a

general permit or as needed.

RPC Production – Emission Limitations

- 37.a Incorporation of NESHAP Subpart WWWW HAP emission factors to calculate the organic HAP emission factors from RPC open molding operations – added for clarification and flexibility.
- 37.b Incorporation of NESHAP Subpart WWWW organic HAP emission limits and/or allowable organic HAP contents for all resins or gelcoats applied in RPC open molding operations – added for clarification and flexibility.
- 37.c Incorporation of NESHAP Subpart WWWW Work Practice Standards – for all subject sources.

Surface Coating Operations – Local Standards

- 38.a Overspray standard unchanged
- 38.b VOC general control standard unchanged
- 38.c Architectural coating standards unchanged

All Operations

- 39.a General control requirements added
- 39.b Operation and maintenance requirements added
- 39.c Materials handling requirements added
- 39.d Odor standard unchanged. The odor limitation is SIP standard a federally enforceable local standard. Periodic checks for odor are included in periodic inspections in condition
- 39.e Opacity Standards unchanged.
- 39.f Visibility Limiting standard unchanged.

§ 5: Monitoring and Recordkeeping Requirements

Reinforced Plastic Composites Production

- 41.a Recordkeeping requirement for compliance demonstration with product use limitations (36.a.ii and 36.a.iv). Compliance demonstration, usage limits will be required for the most recent 12-consecutive month period in addition to single months (as the standard limits use by 12-month periods).
- 41.b In order to dispense resin or gel coat from a spray gun or flow coater in a useful manner a fluid stream must be converted into a flat, symmetrical shape. This shape is termed a fan pattern or a atomizing air. Non-atomized applicators use specialized fluid tips as the primary means to shape the fluid stream into a fan pattern, without the need of atomization. The Permittee is required to ensure non-atomized application is used in the spray coating activities.
- 41.c Emissions recordkeeping requirement to demonstrate that the source has remained below projected emission (and more importantly) below the 90 ton threshold. The Permittee is required to maintain records for the individual months in addition to the 12-consecutive month period. The emission factors provided were based on the 10-03-2006 application and match the calculations provided in the MACT.
- 41.d Added – As applicable, the Permittee must monitor and collect data on resin and gelcoat use, organic HAP contents, and operations where they are used to demonstrate continuous compliance with 40 CFR 63, Subpart WWWW, and in accordance with 40 CFR § 63.5895. See conditions 37.b and c.

Work Practice Standards

- 42.a – f These are general compliance requirements that apply to all facilities subject to subpart WWWW. The conditions also contain streamlined elements to monitor for odor and opacity in accordance with the Pima County SIP to document compliance with condition 39.d and e.

Adhesives & Activators

- 43.a Product usage requirement to demonstrate that the source has remained below projected emission limitation (90 ton threshold).
- 43.b Record keeping requirement to demonstrate that the source remains below projected emission limitation (90 ton threshold).

Surface Coating Operations

- 44.a Product usage requirement to demonstrate that the source has remained below projected emission limitation (90 ton threshold).
- 44.b Record keeping requirement to demonstrate that the source remains below projected emission limitation (90 ton threshold).

All Operations

- 45.a – d These are general compliance requirements that apply to all facilities subject to subpart WWWW. The conditions have remained unchanged since the initial permit issuance.

§ 6: Reporting Requirements

- 50. Excess Emissions and Permit Deviations
- 51. Semiannual Summary Reports of Required Monitoring
Emissions from resin usage, gel coat usage, cleanup solvents, adhesives and activators, paint products used.

Added the calculated 12-month weighted average organic HAP emission limits and weighted average organic HAP emission factors for all open molding operations (as applies if using one of the averaging options in 40 CFR 63.5810). See conditions 37.a and 37.b

- 52. Compliance certification reporting including WWWW requirements.

Removed Emissions Inventory requirement in this section since it is a general condition included in Part A of the permit.

§ 7: Testing Requirements

Testing requirements unchanged.