



CLASS II AIR QUALITY PERMIT

DRAFT PERMIT No. 103028

PERMITTEE: Superior Industries, Inc.
FACILITY: Superior Industries Southwest Division
PLACE ID: 125702
DATE ISSUED: Date Pending
EXPIRY DATE: Date Pending

SUMMARY

This Class II air quality synthetic minor permit is issued to Superior Industries, Inc., the Permittee, for the continued operation of a southwest division conveyor manufacturing facility. The facility is located at 9880 Superior Lane, Prescott Valley, Arizona 86314. This permit renews and supersedes Permit No. 77409.

The southwest division facility includes fabrication, assembly, and painting operations from raw steel. The facility has the potential to emit (PTE), without controls or operating limitations more than 100 tons per year (tpy) of volatile organic compounds (VOCs), 25 tpy of combined federal hazardous air pollutants (HAPs), and 10 tpy of a single federal HAP. In order to qualify for a Class II synthetic minor permit as allowed under Arizona Administrative Code (A.A.C.) R18-2-302.B.2, the facility has taken a facility-wide VOC emissions limitation of 90 tpy, a combined federal HAP emissions limitation of 22.5 tpy, and a single federal HAP emissions limitation of 9 tpy.

This permit is issued in accordance with Arizona Revised Statutes (A.R.S.) § 49-426. It contains requirements from Title 18, Chapter 2 of the A.A.C. and Title 40 of the Code of Federal Regulations (CFR). All definitions, terms, and conditions used in this permit conform to those in the Arizona Administrative Code R18-2-101 et. seq. (A.A.C.) and Title 40 of the CFR, except as otherwise defined in this permit.

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ATTACHMENT "A": GENERAL PROVISIONS

I. PERMIT EXPIRATION AND RENEWAL

- A. This permit is valid for a period of five (5) years from the date of issuance.
[A.R.S. § 49-426.F, A.A.C. R18-2-306.A.1]
- B. The Permittee shall submit an application for renewal of this permit at least six (6) months, but not more than eighteen (18) months, prior to the date of permit expiration.
[A.A.C. R18-2-304.D.2]

II. COMPLIANCE WITH PERMIT CONDITIONS

- A. The Permittee shall comply with all conditions of this permit including all applicable requirements of the Arizona Revised Statutes (A.R.S.) § Title 49, Chapter 3, and the air quality rules under Title 18, Chapter 2 of the Arizona Administrative Code. Any permit noncompliance is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application. In addition, noncompliance with any federally enforceable requirement constitutes a violation of the Clean Air Act.
[A.A.C. R18-2-306.A.8.a]
- B. 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.
[A.A.C. R18-2-306.A.8.b]

III. PERMIT REVISION, REOPENING, REVOCATION AND REISSUANCE, OR TERMINATION FOR CAUSE

- A. The permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a permit revision, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[A.A.C. R18-2-306.A.8.c]
- B. The permit shall be reopened and revised under any of the following circumstances:
1. The Director or the EPA Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; and
[A.A.C. R18-2-321.A.1.c]
 2. The Director or the EPA Administrator determines that the permit needs to be revised or revoked to assure compliance with the applicable requirements.
[A.A.C. R18-2-321.A.1.d]
- C. Proceedings to reopen and issue a permit, including appeal of any final action relating to a permit reopening, shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening

IV. POSTING OF PERMIT

shall be made as expeditiously as practicable. Permit reopenings shall not result in a resetting of the five-year permit term.

[A.A.C. R18-2-321.A.2]

IV. POSTING OF PERMIT

A. The Permittee shall post this permit or a certificate of permit issuance on location where the equipment is installed in such a manner as to be clearly visible and accessible. All equipment covered by this permit shall be clearly marked with one of the following:

[A.A.C. R18-2-315.A]

1. Current permit number; or

[A.A.C. R18-2-315.A.1]

2. Serial number or other equipment ID number that is also listed in the permit to identify that piece of equipment.

[A.A.C. R18-2-315.A.2]

B. A copy of the complete permit shall be kept on site.

[A.A.C. R18-2-315.B]

V. FEE PAYMENT

The Permittee shall pay fees to the Director pursuant to A.R.S. § 49-426(E) and A.A.C. R18-2-326.

[A.A.C. R18-2-306.A.9 and -326]

VI. EMISSIONS INVENTORY QUESTIONNAIRE AND EMISSIONS STATEMENT

A. Emissions Inventory Questionnaire

1. The Permittee shall complete and submit to the Director an emissions inventory questionnaire no later than June 1 every three years beginning June 1, 2021. At the Director's request, the Permittee may be required to complete and submit emissions inventory questionnaires in addition to the triennial emissions inventory questionnaire. The Director shall notify the Permittee in writing of the decision to require additional emissions inventory questionnaires.

[A.A.C. R18-2-327.A.1.b]

2. The emissions inventory questionnaire shall be on an electronic or paper form provided by the Director and shall include the information required by A.A.C. R18-2-327.A.3 for the previous calendar year.

[A.A.C. R18-2-327.A.3]

3. The Permittee shall submit to the Director an amendment to an emissions inventory questionnaire, containing the documentation required by A.A.C. R18-2-327.A.3, whenever the Permittee discovers or receives notice, within two years of the original submittal, that incorrect or insufficient information was submitted to the Director by a previous emissions inventory questionnaire. The amendment shall be submitted to the Director within 30 days of discovery or receipt of notice. If the incorrect or insufficient information resulted in an incorrect annual emissions fee,

VII. COMPLIANCE CERTIFICATION

the Director shall require that additional payment be made or shall apply an amount as a credit to a future annual emissions fee. The submittal of an amendment shall not subject the Permittee to an enforcement action or a civil or criminal penalty if the original submittal of incorrect or insufficient information was not due to willful neglect.

[A.A.C. R18-2-327.A.4]

B. Emissions Statement

1. If the source operated in an ozone nonattainment area and actual emissions of nitrogen oxides (NO_x) and/or volatile organic compounds (VOCs) during the calendar year are 25 tons or more, then the Permittee shall complete and submit to the Director an emissions statement no later than June 1 of the following year. If the Permittee submits an emission inventory questionnaire under Condition VI.A, then the Permittee is not required to also submit an emissions statement for that submission year.

[A.A.C. R18-2-327.B.1 and B.5]

2. The emissions statement shall be on an electronic or paper form provided by the Director and shall include the information required by A.A.C. R18-2-327.B.2 for the previous calendar year.

[A.A.C. R18-2-327.B.2]

3. If either NO_x or VOC annual emissions are greater than or equal to 25 tons, the other pollutant shall be included in the emissions statement even if less than 25 tons.

[A.A.C. R18-2-327.B.3]

4. The Permittee shall submit to the Director an amendment to an emissions statement containing the documentation required by A.A.C. R18-2-327.B.2 whenever the Permittee discovers or receives notice within two years of the original submittal that incorrect or insufficient information was submitted to the Director by a previous emissions statement. The amendment shall be submitted to the Director within 30 days of discovery or receipt of notice. The submittal of an amendment shall not subject the Permittee to an enforcement action or a civil or criminal penalty if the original submittal of incorrect or insufficient information was not due to willful neglect.

[A.A.C. R18-2-327.B.4]

VII. COMPLIANCE CERTIFICATION

- A.** The Permittee shall submit a compliance certification to the Director annually which describes the compliance status of the source with respect to each permit condition. The certification shall be submitted no later than September 15th, and shall report the compliance status of the source during the period between August 1st of the previous year and July 31st of the current year.

[A.A.C. R18-2-309.2.a]

- B.** The compliance certifications shall include the following:

1. Identification of each term or condition of the permit that is the basis of the certification;
[A.A.C. R18-2-309.2.c.i]
2. Identification of the methods or other means used by the Permittee for determining the compliance status with each term and condition during the certification period;
[A.A.C. R18-2-309.2.c.ii]
3. Status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certifications shall identify each deviation (including any deviations reported pursuant to Condition XII.B of this Attachment) during the period covered by the certification and take it into account for consideration in the compliance certification
[A.A.C. R18-2-309.2.c.iii]
4. Other facts the Director may require in determining the compliance status of the source.
[A.A.C. R18-2-309.2.c.iv]

VIII. CERTIFICATION OF TRUTH, ACCURACY AND COMPLETENESS

Any document required to be submitted by this permit, including reports, shall contain a certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

[A.A.C. R18-2-309.3]

IX. INSPECTION AND ENTRY

Upon presentation of proper credentials, the Permittee shall allow the Director or the authorized representative of the Director to:

- A. Enter upon the Permittee's premises where a source is located, emissions-related activity is conducted, or where records are required to be kept under the conditions of the permit;
[A.A.C. R18-2-309.4.a]
- B. Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;
[A.A.C. R18-2-309.4.b]
- C. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
[A.A.C. R18-2-309.4.c]
- D. Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements; and
[A.A.C. R18-2-309.4.d]
- E. Record any inspection by use of written, electronic, magnetic and photographic media.

[A.A.C. R18-2-309.4.e]

X. PERMIT REVISION PURSUANT TO FEDERAL HAZARDOUS AIR POLLUTANT STANDARD

If this source becomes subject to a standard promulgated by the EPA Administrator pursuant to Section 112(d) of the Act, then the Permittee shall, within twelve (12) 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.

[A.A.C. R18-2-304.D.3]

XI. ACCIDENTAL RELEASE PROGRAM

If this source becomes subject to the provisions of 40 CFR Part 68, then the Permittee shall comply with these provisions according to the time line specified in 40 CFR Part 68.

[40 CFR Part 68]

XII. EXCESS EMISSIONS AND EMERGENCY REPORTING

A. Excess Emissions Reporting

[A.A.C. R18-2-310.01.A, B, and C]

1. Excess emissions shall be reported as follows:

- a. The Permittee shall report to the Director any emissions in excess of the limits established by this permit. Such report shall be in two parts as specified below:

[A.A.C. R18-2-310.01.A]

- (1) Notification by myDEQ, telephone, or facsimile within 24 hours of the time when the Permittee first learned of the occurrence of excess emissions including all available information from Condition XII.A.1.b below.

[A.A.C. R18-2-310.01.A.1]

- (2) Detailed written notification by submission of an excess emissions report within 72 hours of the notification pursuant to Condition XII.A.1.a(1) above.

[A.A.C. R18-2-310.01.A.2]

- b. The report shall contain the following information:

- (1) Identity of each stack or other emission point where the excess emissions occurred;

[A.A.C. R18-2-310.01.B.1]

- (2) Magnitude of the excess emissions expressed in the units of the applicable emission limitation and the operating data and calculations used in determining the magnitude of the excess emissions;

[A.A.C. R18-2-310.01.B.2]

- (3) Time and duration, or expected duration, of the excess emissions;
[A.A.C. R18-2-310.01.B.3]
 - (4) Identity of the equipment from which the excess emissions emanated;
[A.A.C. R18-2-310.01.B.4]
 - (5) Nature and cause of the emissions;
[A.A.C. R18-2-310.01.B.5]
 - (6) 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;
[A.A.C. R18-2-310.01.B.6]
 - (7) Steps that were or are being taken to limit the excess emissions; and
[A.A.C. R18-2-310.01.B.7]
 - (8) If the excess emissions resulted from start-up or malfunction, the report shall contain a list of the steps taken to comply with the permit procedures governing source operation during periods of startup or malfunction.
[A.A.C. R18-2-310.01.B.8]
2. In the case of continuous or recurring excess emissions, the notification requirements shall be satisfied if the source provides the required notification after excess emissions are first detected and includes in such notification an estimate of the time the excess emissions will continue. Excess emissions occurring after the estimated time period, or changes in the nature of the emissions as originally reported, shall require additional notification pursuant to Condition XII.A.1 above.
[A.A.C. R18-2-310.01.C]

B. Permit Deviations Reporting

The Permittee shall promptly report deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the applicable requirement contains a definition of prompt or otherwise specifies a timeframe for reporting deviations, that definition or timeframe shall govern. Where the applicable requirement does not address the timeframe for reporting deviations, the Permittee shall submit reports of deviations according to the following schedule:

1. Notice that complies with Condition XII.A above is prompt for deviations that constitute excess emissions;
[A.A.C. R18-2-306.A.5.b.i]
2. Notice that is submitted within two (2) working days of discovery of the deviation is prompt for deviations of permit conditions identified by Condition I.E.1 of Attachment "B";
[A.A.C. R18-2-306.A.5.b.ii]

XIII. RECORDKEEPING REQUIREMENTS

3. Except as provided in Conditions XII.B.1 and XII.B.2, prompt notification of all other types of deviation shall be annually, concurrent with the annual compliance certification required in Section VII, and can be submitted via myDEQ, the Arizona Department of Environmental Quality's online portal.
[A.A.C. R18-2-306.A.5.b.ii]

XIII. RECORDKEEPING REQUIREMENTS

- A. The Permittee shall keep records of all required monitoring information including, but not limited to, the following:
 1. The date, place as defined in the permit, and time of sampling or measurements;
[A.A.C. R18-2-306.A.4.a.i]
 2. The date(s) any analyses were performed;
[A.A.C. R18-2-306.A.4.a.ii]
 3. The name of the company or entity that performed the analyses;
[A.A.C. R18-2-306.A.4.a.iii]
 4. A description of the analytical techniques or methods used;
[A.A.C. R18-2-306.A.4.a.iv]
 5. The results of analyses; and
[A.A.C. R18-2-306.A.4.a.v]
 6. The operating conditions as existing at the time of sampling or measurement.
[A.A.C. R18-2-306.A.4.a.vi]
- B. The Permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings or other data recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.
[A.A.C. R18-2-306.A.4.b]

XIV. DUTY TO PROVIDE INFORMATION

- A. The Permittee shall furnish to the Director, within a reasonable time, any information that the Director 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. Upon request, the Permittee shall also furnish to the Director copies of records required to be kept by the permit. For information claimed to be confidential, the Permittee shall furnish an additional copy of such records directly to the EPA Administrator along with a claim of confidentiality.
[A.A.C. R18-2-304.G and -306.A.8.e]
- B. If the Permittee has failed to submit any relevant facts or has submitted incorrect information in the permit application, the Permittee shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.



[A.A.C. R18-2-304.H]

XV. PERMIT AMENDMENT OR REVISION

The Permittee shall apply for a permit amendment or revision for changes to the facility which does not qualify for a facility change without revision under Section XVII below, as follows:

- A. Facility Changes that Require a Permit Revision; [A.A.C. R18-2-317.01]
- B. Administrative Permit Amendment; [A.A.C. R18-2-318]
- C. Minor Permit Revision; and [A.A.C. R18-2-319]
- D. Significant Permit Revision. [A.A.C. R18-2-320]

The applicability and requirements for such action are defined in the above referenced regulations.

XVI. FACILITY CHANGES ALLOWED WITHOUT A PERMIT REVISION

- A. Except for a physical change or change in the method of operation at a Class II source requiring a permit revision under A.A.C. R18-2-317.01, or a change subject to logging or notice requirements in Condition XVI.B, a change at a Class II source shall not be subject to revision, notice, or logging requirements under this Section. [A.A.C. R18-2-317.02.A]
- B. The following changes may be made if the source keeps on site records of the changes according to Condition XVI.H below: [A.A.C. R18-2-317.02.B]
 - 1. Implementing an alternative operating scenario, including raw materials changes; [A.A.C. R18-2-317.02.B.1]
 - 2. Changing process equipment, operating procedures, or making any other physical change if the permit requires the change to be logged; [A.A.C. R18-2-317.02.B.2]
 - 3. Engaging in any new insignificant activity listed in A.A.C. R18-2-101.68 but not listed in the permit; [A.A.C. R18-2-317.02.B.3]
 - 4. Replacing an item of air pollution control equipment listed in the permit with an identical (same model, different serial number) item. The Director may require verification of efficiency of the new equipment by performance tests; and [A.A.C. R18-2-317.02.B.4]
 - 5. A change that results in a decrease in actual emissions if the source wants to claim credit for the decrease in determining whether the source has a net emissions increase for any purpose. The logged information shall include a description of

the change that will produce the decrease in actual emissions. A decrease that has not been logged is creditable only if the decrease is quantifiable, enforceable, and otherwise qualifies as a creditable decrease.

[A.A.C. R18-2-317.02.B.5]

C. The following changes may be made if the source provides written notice to the Department in advance of the change as provided below:

[A.A.C. R18-2-317.02.C]

1. Replacing an item of air pollution control equipment listed in the permit with one that is not identical but that is substantially similar and has the same or better pollutant removal efficiency: seven days. The Director may require verification of efficiency of the new equipment by performance tests;

[A.A.C. R18-2-317.02.C.1]

2. A physical change or change in the method of operation that increases actual emissions more than 10 percent of the major source threshold for any conventional pollutant but does not require a permit revision: seven days;

[A.A.C. R18-2-317.02.C.2]

3. Replacing an item of air pollution control equipment listed in the permit with one that is not substantially similar but that has the same or better efficiency: 30 days. The Director may require verification of efficiency of the new equipment by performance tests;

[A.A.C. R18-2-317.02.C.3]

4. A change that would trigger an applicable requirement that already exists in the permit: 30 days unless otherwise required by the applicable requirement;

[A.A.C. R18-2-317.02.C.4]

5. A change that amounts to reconstruction of the source or an affected facility: seven days. For purposes of this subsection, reconstruction of a source or an affected facility shall be presumed if the fixed capital cost of the new components exceeds 50 percent of the fixed capital cost of a comparable entirely new source or affected facility and the changes to the components have occurred over the 12 consecutive months beginning with commencement of construction; and

[A.A.C. R18-2-317.02.C.5]

6. A change that will result in the emissions of a new regulated air pollutant above an applicable regulatory threshold but that does not trigger a new applicable requirement for that source category: 30 days. For purposes of this requirement, an applicable regulatory threshold for a conventional air pollutant shall be 10 percent of the applicable major source threshold for that pollutant.

D. For each change under Condition XVI.C, the written notice shall be by certified mail or hand delivery and shall be received by the Director the minimum amount of time in advance of the change. Notifications of changes associated with emergency conditions, such as malfunctions necessitating the replacement of equipment, may be provided with less than required notice, but must be provided as far in advance of the change, or if advance notification is not practicable, as soon after the change as possible. The written notice shall include:

- [A.A.C. R18-2-317.02.D]
1. When the proposed change will occur, [A.A.C. R18-2-317.02.D.1]
 2. A description of the change, [A.A.C. R18-2-317.02.D.2]
 3. Any change in emissions of regulated air pollutants, and [A.A.C. R18-2-317.02.D.3]
 4. Any permit term or condition that is no longer applicable as a result of the change. [A.A.C. R18-2-317.02.D.4]
- E.** The permit shield described in A.A.C. R18-2-325 shall not apply to any change made under this Section, other than implementation of an alternate operating scenario under Condition XVI.B.1. [A.A.C. R18-2-317.02.F]
- F.** Notwithstanding any other part of this Section, the Director may require a permit to be revised for any change that, when considered together with any other changes submitted by the Permittee under this Section over the term of the permit, constitutes a change under subsection A.A.C. R18-2-317.01.A. [A.A.C. R18-2-317.02.G]
- G.** A copy of all logs required under Condition XVI.B shall be filed with the Director within 30 days after each anniversary of the permit issuance date. If no changes were made at the source requiring logging, a statement to that effect shall be filed instead. [A.A.C. R18-2-317.02.I]
- H.** Logging Requirements [Arizona Administrative Code, Appendix 3]
1. Each log entry required by a change under Condition XVI.B shall include at least the following information:
 - a. A description of the change, including:
 - (1) A description of any process change;
 - (2) A description of any equipment change, including both old and new equipment descriptions, model numbers, and serial numbers, or any other unique equipment ID number; and
 - (3) A description of any process material change.
 - b. The date and time that the change occurred.
 - c. The provisions of Condition XVI.B that authorizes the change to be made with logging.

XVII. TESTING REQUIREMENTS

- d. The date the entry was made and the first and last name of the person making the entry.
2. Logs shall be kept for five (5) years from the date created. Logging shall be performed in indelible ink in a bound log book with sequentially number pages, or in any other form, including electronic format, approved by the Director.

XVII. TESTING REQUIREMENTS

- A.** The Permittee shall conduct performance tests as specified in the permit and at such other times as may be required by the Director.

[A.A.C. R18-2-312.A]

- B.** Operational Conditions during Performance Testing

Performance tests shall be conducted under such conditions as the Director shall specify to the plant operator based on representative performance of the source. The Permittee shall make available to the Director such records as may be necessary to determine the conditions of the performance tests. Operations during periods of start-up, shutdown, and malfunction (as defined in A.A.C. R18-2-101) shall not constitute representative conditions of performance tests unless otherwise specified in the applicable standard.

[A.A.C. R18-2-312.C]

- C.** Performance Tests shall be conducted and data reduced in accordance with the test methods and procedures contained in the Arizona Testing Manual unless modified by the Director pursuant to A.A.C. R18-2-312.B.

[A.A.C. R18-2-312.B]

- D.** Test Plan

At least 14 working days prior to performing a test, the Permittee shall submit a test plan to the Director, which must include the following, in addition to all other applicable requirements, as identified in the Arizona Testing Manual:

[A.A.C. R18-2-312.B]

1. Test duration;
2. Test location(s);
3. Test method(s); and
4. Source operation and other parameters that may affect test results.

- E.** Stack Sampling Facilities

The Permittee shall provide, or cause to be provided, performance testing facilities as follows:

[A.A.C. R18-2-312.E]

1. Sampling ports adequate for test methods applicable to the facility;

XVII. TESTING REQUIREMENTS

2. Safe sampling platform(s);
3. Safe access to sampling platform(s); and
4. Utilities for sampling and testing equipment.

F. Interpretation of Final Results

Each performance test shall consist of three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard, the arithmetic mean of the results of the three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the three runs is required to be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the Permittee's control, compliance may, upon the Director's approval, be determined using the arithmetic mean of the results of the other two runs. If the Director or the Director's designee is present, tests may only be stopped with the Director's or such designee's approval. If the Director or the Director's designee is not present, tests may only be stopped for good cause. Good cause includes: forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the Permittee's control. Termination of any test without good cause after the first run is commenced shall constitute a failure of the test. Supporting documentation, which demonstrates good cause, must be submitted.

[A.A.C. R18-2-312.F]

G. Report of Final Test Results

A written report of the results of performance tests conducted pursuant to 40 CFR 60 or 63, shall be submitted to the Director within 60 days after the test is performed. A written report of the results of all other performance tests shall be submitted within 4 weeks after the test is performed, or as otherwise provided in the Arizona Testing Manual. All performance testing reports shall be submitted in accordance with the Arizona Testing Manual and A.A.C. R18-2-312.A.

[A.A.C. R18-2-312.A and B]

H. Extension of Performance Test Deadline

For performance testing required under Condition XVII.A above, the Permittee may request an extension to a performance test deadline due to a force majeure event as follows:

[A.A.C. R18-2-312.J]

1. If a force majeure event is about to occur, occurs, or has occurred for which the Permittee intends to assert a claim of force majeure, the Permittee shall notify the Director in writing as soon as practicable following the date the Permittee first knew, or through due diligence should have known that the event may cause or caused a delay in testing beyond the regulatory deadline. The notification must occur before the performance test deadline unless the initial force majeure or a subsequent force majeure event delays the notice, and in such cases, the notification shall be given as soon as practicable.

XVIII. PROPERTY RIGHTS

[A.A.C. R18-2-312.J.1]

2. The Permittee shall provide to the Director a written description of the force majeure event and a rationale for attributing the delay in testing beyond the regulatory deadline to the force majeure; describe the measures taken or to be taken to minimize the delay; and identify a date by which the Permittee proposes to conduct the performance test. The performance test shall be conducted as soon as practicable after the force majeure event occurs.

[A.A.C. R18-2-312.J.2]

3. The decision as to whether or not to grant an extension to the performance test deadline is solely within the discretion of the Director. The Director shall notify the Permittee in writing of approval or disapproval of the request for an extension as soon as practicable.

[A.A.C. R18-2-312.J.3]

4. Until an extension of the performance test deadline has been approved by the Director under Conditions XVII.H.1, 2, and 3 above, the Permittee remains subject to the requirements of Section XVII.

[A.A.C. R18-2-312.J.4]

5. For purposes of this Section XVII, a “force majeure event” means an event that will be or has been caused by circumstances beyond the control of the Permittee, its contractors, or any entity controlled by the Permittee that prevents it from complying with the regulatory requirement to conduct performance tests within the specified timeframe despite the Permittee's best efforts to fulfill the obligation. Examples of such events are acts of nature, acts of war or terrorism, or equipment failure or safety hazard beyond the control of the Permittee.

[A.A.C. R18-2-312.J.5]

XVIII. PROPERTY RIGHTS

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

[A.A.C. R18-2-306.A.8.d]

XIX. SEVERABILITY CLAUSE

The provisions of this permit are severable. In the event of a challenge to any portion of this permit, or if any portion of this permit is held invalid, the remaining permit conditions remain valid and in force.

[A.A.C. R18-2-306.A.7]

XX. PERMIT SHIELD

Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements identified in the portions of this permit subtitled “Permit Shield”. The permit shield shall not apply to minor revisions pursuant to Condition XV.C of this Attachment and any facility changes without a permit revision pursuant to Section XVI of this Attachment.

[A.A.C. R18-2-317.F, - 320, and -325]

XXI. PROTECTION OF STRATOSPHERIC OZONE

If this source becomes subject to the provisions of 40 CFR Part 82, then the Permittee shall comply with these provisions accordingly.

[40 CFR Part 82]

XXII. APPLICABILITY OF NSPS/NESHAP GENERAL PROVISIONS

For all equipment subject to a New Source Performance Standard or a National Emission Standard for Hazardous Air Pollutants, the Permittee shall comply with all applicable requirements contained in Subpart A of Title 40, Chapter 60 and Chapter 63 of the Code of Federal Regulation.

[40 CFR Part 60 Subpart A and Part 63 Subpart A]

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ATTACHMENT "B": SPECIFIC CONDITIONS

I. FACILITY-WIDE REQUIREMENTS

A. Applicability

This Section includes facility-wide requirements.

B. Opacity

1. Instantaneous Surveys and Six-Minute Observations

a. Instantaneous Surveys

Any instantaneous survey required by this permit shall be determined by either option listed in Conditions I.B.1.a(1) and (2):

[A.A.C. R18-2-311.B]

(1) Alternative Method ALT-082 (Digital Camera Operating Technique)

(a) The Permittee, or Permittee representative, shall be certified in the use of Alternative Method ALT-082.

(b) The results of all instantaneous surveys and six-minute observations shall be obtained within two (2) hours.

(2) EPA Reference Method 9 Certified Observer.

[A.A.C. R18-2-306.A.3.c]

b. Six-Minute Observations

Any six-minute observation required by this permit shall be determined by either option listed in Conditions I.B.1.b(1) and (2):

[A.A.C. R18-2-311.B]

(1) Alternative Method ALT-082 (Digital Camera Operating Technique)

(a) The Permittee, or Permittee representative, shall be certified in the use of Alternative Method ALT-082.

(b) The results of all instantaneous surveys and six-minute observations shall be obtained within two (2) hours.

(2) EPA Reference Method 9.

2. Monitoring, Recordkeeping and Reporting Requirements

[A.A.C. R18-2-306.A.3.c]

I. FACILITY-WIDE REQUIREMENTS

- a. At the frequency specified in the following sections of this permit, the Permittee shall conduct an instantaneous survey of visible emissions from both process stack sources, when in operation, and fugitive dust sources.
- b. If the visible emissions on an instantaneous basis appears less than or equal to the applicable opacity standard, then the Permittee shall keep a record of the name of the observer, the date on which the instantaneous survey was made, and the results of the instantaneous survey.
- c. If the visible emissions on an instantaneous basis appears greater than the applicable opacity standard, then the Permittee shall immediately conduct a six-minute observation of the visible emissions.
 - (1) If the six-minute observation of the visible emissions is less than or equal to the applicable opacity standard, then the Permittee shall record the name of the observer, the date on which the six-minute observation was made, and the results of the six-minute observation.
 - (2) If the six-minute observation of the visible emissions is greater than the applicable opacity standard, then the Permittee shall do the following:
 - (a) Adjust or repair the controls or equipment to reduce opacity to less than or equal to the opacity standard;
 - (b) Record the name of the observer, the date on which the six-minute observation was made, the results of the six-minute observation, and all corrective action taken; and
 - (c) Report the event as an excess emission for opacity in accordance with Condition XII.A of Attachment "A".
 - (d) Conduct another six-minute observation to document the effectiveness of the adjustments or repairs completed.

C. Volatile Organic Compounds (VOCs)

1. Emissions Limitation

The Permittee shall limit facility-wide VOC emissions to 90 tons per year on a 12-month rolling basis.

[A.A.C. R18-2-306.01.A and -331.A.3.a]

[Material Permit Conditions are identified by underlines and italics]

2. Monitoring and Recordkeeping Requirements

- a. The Permittee shall maintain records of all purchase orders and invoices associated with the purchasing and procurement of all VOC containing

I. FACILITY-WIDE REQUIREMENTS

materials (including but not limited to paints, solvents, and adhesives) that are used in the facility.

[A.A.C. R18-2-306.A.3.c]

- b. The Permittee shall maintain a Material Safety Data Sheet (MSDS) for each VOC containing material that is used in the facility.

[A.A.C. R18-2-306.A.3.c]

- c. At the end of each month, the Permittee shall calculate and record the total VOC emissions (in tons per month) emitted into the atmosphere for each VOC containing material based on that month's purchase order(s).

[A.A.C. R18-2-306.A.3.c]

- d. Each month, the Permittee shall calculate and record the total VOC emissions (in tons per month) emitted into the atmosphere by summing the VOC emissions for all VOC containing materials based on that month's purchase order(s).

[A.A.C. R18-2-306.A.3.c]

- e. Each month, the Permittee shall calculate and record the 12-month rolling total of VOC emissions (in tons per year) emitted into the atmosphere.

[A.A.C. R18-2-306.A.3.c]

D. Hazardous Air Pollutants (HAPs)

1. Emissions Limitation

The Permittee shall limit HAP emissions to the following amounts per year on a 12-month rolling basis:

- a. *9 tons of any single federal HAP; or*

- b. *22.5 tons of combined federal HAPs.*

[A.A.C. R18-2-306.01.A and -331.A.3.a]

[Material Permit Conditions are identified by underlines and italics]

2. Monitoring and Recordkeeping Requirements

- a. The Permittee shall maintain records of all purchase orders and invoices associated with the purchasing and procurement of all HAP containing materials (including but not limited to paints, solvents, and adhesives) that are used in the facility.

[A.A.C. R18-2-306.A.3.c]

- b. The Permittee shall maintain a Material Safety Data Sheet (MSDS) for each HAP containing material that is used in the facility.

[A.A.C. R18-2-306.A.3.c]

I. FACILITY-WIDE REQUIREMENTS

- c. At the end of each month, the Permittee shall calculate and record the total HAP emissions (in tons per month) emitted into the atmosphere for each HAP containing material based on that month's purchase order(s).
[A.A.C. R18-2-306.A.3.c]
- d. Each month, the Permittee shall calculate and record the total HAP emissions (in tons per month) emitted into the atmosphere by summing the HAP emissions for all HAP containing materials based on that month's purchase order(s).
[A.A.C. R18-2-306.A.3.c]
- e. Each month, the Permittee shall calculate and record the 12-month rolling total of HAP emissions (in tons per year) emitted into the atmosphere.
[A.A.C. R18-2-306.A.3.c]

E. Recordkeeping and Reporting Requirements

1. Deviations from the following Attachment "B" permit conditions shall be promptly reported in accordance with Condition XII.B.2 of Attachment "A":
[A.A.C. R18-2-306.A.5.b]
 - a. Condition II.B.1;
 - b. Conditions II.B.2.a through II.B.2.c; and
 - c. Conditions II.C.1.a through II.C.1.d.
2. The Permittee shall maintain, on-site, records of the manufacturer's specifications for all equipment.
[A.A.C. R18-2-306.A.4]
3. The Permittee shall submit reports of all monitoring activities required in Attachment "B" along with the annual compliance certification required by Section VII of Attachment "A."
[A.A.C. R18-2-306.A.5.a]

F. Permit Shield

Nothing in this permit shall alter or affect the following:

[A.A.C. R18-2-325.B]

1. The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the EPA Administrator under that Section;
2. The liability of the facility for any violation of applicable requirements prior to or at the time of permit issuance;
3. The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act;



II. SPRAY PAINT BOOTH REQUIREMENTS

4. The ability of the EPA Administrator or the Director to obtain information from the facility pursuant to Section 114 of the Clean Air Act, or any provision of state law; and
5. The authority of the Director to require compliance with new applicable requirements adopted after the permit is issued.

II. SPRAY PAINT BOOTH REQUIREMENTS

A. Applicability

This Section applies to spray paint booths listed in Attachment “C” as subject to A.A.C. R18-2-727 for Spray Painting Operations.

B. Operational Limitations

1. Air Pollution Control Requirements

At all times, the Permittee shall, to the extent practicable, operate and maintain panel filters on each spray paint booth in a manner consistent with good air pollution control for minimizing emissions. The Permittee shall inspect and maintain the panel filters in accordance with manufacturer specifications.

[A.A.C. R18-2-306.01 and -331.A.3.a]

[Material Permit Conditions are identified by underlines and italics]

2. Spray Guns

a. *The Permittee shall use only spray paint guns with a rated transfer efficiency of 70 percent or more at A-Line, B-Line and C-Line Paint Booths.*

[A.A.C. R18-2-306.01 and -331.A.3.a]

[Material Permit Conditions are identified by underlines and italics]

b. *The Permittee shall use only spray paint guns with a rated transfer efficiency of 75 percent or more at Pulley Paint Touch-up Booth.*

[A.A.C. R18-2-306.01 and -331.A.3.a]

[Material Permit Conditions are identified by underlines and italics]

c. *The Permittee shall only operate one (1) spray gun in each spray paint booth at any given time.*

[A.A.C. R18-2-306.01 and -331.A.3.a]

[Material Permit Conditions are identified by underlines and italics]

C. Volatile Organic Compounds

1. Emission Limitations and Standards

a. The Permittee shall not conduct or cause to be conducted any spray-painting operation without minimizing organic solvent emissions. Such operations, other than architectural coating and spot painting, shall be

II. SPRAY PAINT BOOTH REQUIREMENTS

conducted in an enclosed area equipped with controls containing no less than 96 percent of the overspray.

[A.A.C. R18-2-727.A]

b. The Permittee or their designated contractor shall not either:

(1) Employ, apply, evaporate, or dry any architectural coating containing photochemically reactive solvents for industrial or commercial purposes; or

(2) Thin or dilute any architectural coating with a photochemically reactive solvent.

[A.A.C. R18-2-727.B]

c. For the purposes of Condition II.C.1.b above, a photochemically reactive solvent shall be any solvent with an aggregate of more than 20 percent of its total volume composed of the chemical compounds classified in Conditions II.C.1.c(1) through II.C.1.c(3) below, or which exceeds any of the following percentage composition limitations, referred to the total volume of solvent:

(1) A combination of the following types of compounds having an olefinic or cyclo-olefinic type of unsaturation-hydrocarbons, alcohols, aldehydes, esters, ethers, or ketones: 5 percent.

(2) A combination of aromatic compounds with eight or more carbon atoms to the molecule except ethylbenzene: 8 percent.

(3) A combination of ethylbenzene, ketones having branched hydrocarbon structures, trichloroethylene or toluene: 20 percent.

[A.A.C. R18-2-727.C]

d. Whenever any organic solvent or any constituent of an organic solvent may be classified from its chemical structure into more than one of the groups of organic compounds described in Conditions II.C.1.c(1) through II.C.1.c(3) above, it shall be considered to be a member of the group having the least allowable percent of the total volume of solvents.

[A.A.C. R18-2-727.D]

2. Opacity

a. Emission Limitations and Standards

The Permittee shall not cause, allow or permit visible emissions from painting operations in excess of 20 percent opacity.

[A.A.C. R18-2-702.B.3]

b. Recordkeeping Requirements

The Permittee shall monitor visible emissions in accordance with Condition II.C.2.a above.



III. OVEN REQUIREMENTS

[A.A.C. R18-2-306.A.3.c]

D. Permit Shield

Compliance with the Conditions of this Section shall be deemed compliance with A.A.C. R18-2-702.B.3, -727.B-C, and -727.D.

[A.A.C. R18-2-325]

III. OVEN REQUIREMENTS

A. Applicability

This Section applies to the natural gas ovens identified in Attachment “C” as subject to A.A.C. R18-2-724 for Fossil-fuel Fired Industrial and Commercial Equipment.

B. Particulate Matter (PM/PM₁₀/PM_{2.5}) and Opacity

1. The Permittee shall not cause, allow or permit the emission of particulate matter, caused by combustion of fuel, from any oven in excess of the amounts calculated by the following equation:

a. For equipment having a heat input rate of 4200 million Btu per hour or less, the maximum allowable emissions shall be determined by the following equation:

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

where:

E = the maximum allowable particulate emissions rate in pounds-mass per hour

Q = the heat input in million Btu per hour.

[A.A.C. R18-2-724.C]

b. The heat input shall be the aggregate heat content of all fuels whose products of combustion pass through a stack or other outlet. The total heat input of all fuel burning units on a plant or premises shall be used for determining the maximum allowable amount of particulate matter which may be emitted.

[A.A.C. R18-2-724.B]

C. Permit Shield

Compliance with the Conditions of this Section shall be deemed compliance with A.A.C. R18-2-724.B and -724.C.

[A.A.C. R18-2-325]

IV. FUGITIVE DUST REQUIREMENTS

A. Applicability



V. OTHER PERIODIC ACTIVITIES

This Section applies to any non-point source of fugitive dust in the facility.

B. Particulate Matter and Opacity

Open Areas, Roadways & Streets, Storage Piles, and Material Handling

1. Emission Limitation

- a. Opacity of emissions from any fugitive dust non-point source shall not be greater than 40 percent.

[A.A.C. R18-2-614]

2. Monitoring and Recordkeeping Requirement

- a. The Permittee shall monitor visible emissions in accordance with Condition IV.B.1.a above.

[A.A.C. R18-2-306.A.3.c]

C. Permit Shield

Compliance with the Conditions of this Section shall be deemed compliance with A.A.C. R18-2-604, -605, and -614.

[A.A.C. R18-2-325]

V. OTHER PERIODIC ACTIVITIES

A. Abrasive Blasting

1. Particulate Matter and Opacity

- a. Emission Limitations and Standards

The Permittee shall not cause or allow sandblasting or other abrasive blasting without minimizing dust emissions to the atmosphere through the use of good modern practices. Good modern practices include:

[A.A.C. R18-2-726]

- (1) Wet blasting;
- (2) Effective enclosures with necessary dust collecting equipment; or
- (3) Any other method approved by the Director.

- b. Opacity

The Permittee shall not cause, allow or permit visible emissions from sandblasting or other abrasive blasting operations in excess of 20 percent opacity.

[A.A.C. R18-2-702.B.3]

V. OTHER PERIODIC ACTIVITIES

2. Monitoring and Recordkeeping Requirements

a. Each time an abrasive blasting project is conducted, the Permittee shall make a record of the following:

- (1) The date the project was conducted;
- (2) The duration of the project; and
- (3) Type of control measures employed.

[A.A.C. R18-2-306.A.3.c]

3. Permit Shield

Compliance with Conditions of this Section shall be deemed compliance with A.A.C. R18-2-702.B.3 and -726.

[A.A.C. R18-2-325]

B. Demolition/Renovation - Hazardous Air Pollutants

1. Emission Limitation and Standard

The Permittee shall comply with all of the requirements of 40 CFR 61 Subpart M for National Emission Standards for Hazardous Air Pollutants - Asbestos.

[A.A.C. R18-2-1101.A.12]

2. Monitoring and Recordkeeping Requirement

The Permittee shall keep all required records in a file. The required records shall include the "NESHAP Notification for Renovation and Demolition Activities" form and all supporting documents.

[A.A.C. R18-2-306.A.3.c]

3. Permit Shield

Compliance with the Conditions of this Section shall be deemed compliance with A.A.C. R18-2-1101.A.12.

[A.A.C. R18-2-325]

ATTACHMENT “C”: EQUIPMENT LIST

EQUIPMENT TYPE	MAX. CAPACITY	MAKE	MODEL	SERIAL NUMBER	DATE OF MANUFACTURE	EQUIPMENT ID NUMBER	A.A.C. / NSPS / NESHAP
A-Line Paint Booth	3.98 gal/hr	Graco	Pro XS4	A23501/A23418	2008	EP1	A.A.C. R18-2-727
B-Line Paint Booth	3.98 gal/hr	Graco	Pro XS4	57156/A23400	2013	EP2	A.A.C. R18-2-727
C-Line Paint Booth	3.98 gal/hr	RTT Engineered Solutions	XCD-18-16- 75-N-DT	SO73125	2024	EP7	A.A.C. R18-2-727
Pulley Paint Touch-Up Booth	4.22 gal/hr	Devilbiss	Com-P5522G- 14-00	BH11 9LH	2013	EP3 and EP4 (2 stack vents)	A.A.C. R18-2-727
Abrasive Blasting Booth	13.1 ft/min	Rosler	RRB 16/5	63022	2014	N/A*	A.A.C. R18-2-726
Water Wash Booth Oven	4 MMBtu/hr	Maxon	6 TOT	886351	N/A	EP5	A.A.C. R18-2-724
Powder Paint Cure Oven	4 MMBtu/hr	Eclipse Airheat	AH Burner Series	custom	N/A	EP6	A.A.C. R18-2-724

*N/A = Not Available