REPUBLIC PLASTICS, L.P. - ELOY

1. Introduction

This permit pertains to a polystyrene foam manufacturing facility, operated by Republic Plastics, L.P. The SIC Code is 3086. The facility called the Eloy Manufacturing Plant, is located at 1550 West Battaglia Road, Eloy, Arizona, upon a parcel also identified by Pinal County Assessor's Parcel #404-12-003F3. The source is situated in an area classified as non-attainment for PM10 and attainment.

Virgin polystyrene resin pellets are received via rail at an offsite rail spur. The pellets are transferred from the railcars to the Republic Plastics facility via a vacuum truck. The polystyrene resin pellets and polystyrene resin pellets filled with talc are melted in the extruders and injected with isobutane or CO2, blowing agents, under high pressure. The mix is then forced through the exit die and cooled to create a continuous tubular shape. As the material exits the die and the pressure is released, the blowing agent expands forming bubbles within the extruded polystyrene. The tubular shape leaving the extruder is then slit into two flat sheets, and they are rolled into two spindles and stored for three to four days. After aging, the rolls are fed through a thermoformer to mold into plates or bowls which are then stamped out leaving a trim skeleton of product. This skeleton trim is recycled into the system and mixed with pellets to be extruded again. Isobutane emissions (volatile organic compound) occur during the extrusion, storage (aging), thermoforming and stamping stages of the process. Some of the isobutane is retained by the product. For purposes of calculating Volatile Organic Compound (VOC) emissions from this facility, results from actual retention data, analyzed quarterly, or the current retention factor of 0.022 lb isobutane/lb product will be used as a backup factor in the absence of current retention data analysis. No additional testing demonstration is required by this permit.

Particulate emissions occur at the pellet receiver, and they are captured in a fabric filter and dropped into a dust collection drum. Also, particulate matter is emitted during the grinding of the trim skeleton. The small pieces from each grinder, called “fluff”, are blown into a fluff surge hopper. The exhaust from this hopper is controlled by baghouses.

The major emissions from this facility are isobutane, a volatile organic compound (VOC), and some particulate matter (PM10) from the pellet receiver and grinder.

The facility was initially permitted for one line (one extruder, Line 1) in 2010 with permit B31034.000, which restricted VOC emissions to 95 tons per year by limiting the amount of isobutane used in the process. The Permittee applied to add up to 3 more extruder lines (Lines 2, 3 and 4), increasing emissions of VOC to above the major source threshold of 100 tpy, and was issued its initial Title V permit V20648.000 in April 2011.

Renewal V20.000 authorizes the facility to use actual isobutane retention data, analyzed on a quarterly basis for the purposes of quantifying VOC emissions accurately. In the absence of actual retention data, the current retention factor of 0.022 lb isobutane/lb product will be used as a backup factor to calculate VOC emissions.

Renewal V20668.000 added the provisions of the recently adopted West Pinal Fugitive Dust Rule related to vacant and unpaved lots and updated the equipment list to reflect which units had been installed. At the time of renewal 2 extruder lines and associated equipment had been installed and were operating. This renewal also reduced the number of additional extruder lines yet to be installed from 2 to 1. The Permittee disclosed that they found the extruder lines are capable of 2400 lbs/hr instead of the originally permitted 1800 lbs/hr. In order to account for the increased capacity and maintain the original design capacity the total number of authorized extruder lines was reduced to 3.

Without the limitations of the permit, the source would constitute a "major emitting source" for VOCs within the meaning of 40 CFR §51.166, and would require the facility to go through a Prevention of

Significant Deterioration (PSD) review. This source is considered a “synthetic minor” with respect to PSD.

A complete list of equipment from which emissions are allowed by this permit is given in Section 11 of this permit. The facility includes an on-site storage tank for isobutane. The quantity of isobutane stored triggers an obligation under CAA §112.r, requiring certain planning and recordkeeping obligations. This permit merely adopts those requirements by reference. The facility does not otherwise fall subject to any other requirements arising under CAA §§111 or 112.

For additional information, see the "Technical Support Document" for this permit, which outlines the facility configuration, operation, emissions, permitting history and other information.

2. Listing of *(Currently 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 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	Emission Standards - Particulate Emissions - Fugitive Dust
(3/31/75)	43 FR 50531 (11/15/78)
7-3-1.1	Visible Emissions; General
(6/16/80)	47 FR 15579 (4/12/82)

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:

4-2-040	Fugitive Dust Standards
(6/29/93)	72 FR 41896 (08/01/07)

C. CAA §112r) (11/15/90); 40 CFR Part 68 (7/31/98); Chemical Accident Prevention Provisions

D. 40 CFR Part 61, Subpart M. National Emissions Standard for Asbestos

E. CAA §608 (11/15/90); 40 CFR Part 82, Subpart F - Recycling and Emissions Reduction (9/7/95); regulations pertaining to use and handling of ozone-depleting substances.

3. Compliance Certification

A. Compliance Plan
[40 CFR §70.(5)(c)(8)](Code §3-1-083A.7)

Insofar as the Permittee is currently in compliance, the compliance plan consists of continued adherence to the requirements of this permit and those requirements set forth in applicable regulations and statutes.

B. Compliance Schedule
[*40 CFR §§ 70.5(c)(8), 70.6(c)(3)]*(Code §3-1-083A.7)

Since the Permittee is currently in compliance, no compliance schedule to attain compliance is required.

4. Authority to Construct
[Federally enforceable - Code §§3-1-010, 3-1-030, 3-1-040 (as amended 10/12/95) approved as a SIP Element at 61 FR 15717 (4/9/96)]

A. General

Emissions from this facility, specifically the equipment described in "Equipment Schedule" section below, and the operating configuration as defined below and more fully described in the application for permit, fall subject to the enforceable limitations identified throughout this permit. Therefore, based on the regulations in effect upon the date of issuance of this permit and a finding that allowable emissions from the equipment described in the Equipment Schedule will neither cause nor contribute to a violation of any ambient air quality standard even without any additional limitations, this permit constitutes authority to construct and operate such equipment.

B. Equipment Authorized Under Authority to Construct Provided by Permit B31034.000
(Code §3-1-081)

Permit B31034.000 authorized installation of the following equipment associated with Line 1 and listed in the “Equipment Schedule” section of this permit.

1. Extruder, 2400 lb/hr capacity (as modified by Permit V20668.000)
2. 3 - Irwin Research Thermoformers, 165 foot per minute of sheet
3. Pneumatic Pellet Unloading/Vacuum System; Virgin Pellets, 6000 lb/hr
4. Pneumatic Pellet Unloading/Vacuum System; Talc-filled Pellets
5. Talc-pellet receiver Baghouse
6. 3 - Stamping Machines with grinders
7. Grinder, 100 lb/hr
8. Scrap recycling system equipped with 2 baghouses
9. 30,000 gallon pressurized isobutane tank
10. Skeleton Surge Hopper Baghouse, 1000 scfm

C. Equipment Authorized Under Authority to Construct Provided by Permit V20648.000
(Code §3-1-081)

Permit V20648.000 authorized installation of the following equipment associated with Lines 2 and 3 and listed in the “Equipment Schedule” section of this permit, with that installation authority subject to the corresponding installation and operating limitations set forth below in this permit:

1. 2 extruders, 2400 lb/hr capacity each (as modified by Permit V20668.000);
2. 6 thermoformers and stamping machines with grinders (as modified by Permit V20668.000);;
3. 2 scrap grinders (as modified by Permit V20668.000); and,
4. 2 fluff recycle systems with surge hoppers (with 2 baghouses each) (as modified by Permit V20668.000).

C. Operational Limitation

1. Isobutane Meter

a. Permittee shall install and operate flow meters that shall continuously measure the amount of isobutane injected into the extruders.

b. Upon breakdown, an isobutane meter shall be replaced by a meter with an accuracy no less than the original meter.

2. CO2 Meter

a. Permittee shall install and operate flow meters that shall continuously measure the amount of CO2 injected into the extruders.

b. Upon breakdown, a CO2 meter shall be replaced by a meter with an accuracy no less than the original meter.

5. Synthetic Minor Limitations - VOCs
[Federally enforceable provision, pursuant to Code §3-1-084 (8/11/94)] (Code §3-1-081.A)

A. Emission Cap

Permittee shall limit the total emissions from Lines 1-3, in any consecutive twelve-month period, such that emissions of VOCs do not exceed 240 tons.

If at any time, this limit is relaxed, the facility will be subject to the requirements of 40 CFR §52.21(r)(4). Furthermore, if this limit is exceeded, the facility may trigger PSD and may be treated as a source that should have obtained a PSD permit for VOCs.

B. Raw Material Limitations

Permittee shall limit the total isobutane injection to Lines 1-3 to 576 tons in any consecutive twelve-month period, and no more than 67 tons per month.

C. Production Limitations

To stay within the preceding emission cap for VOC emissions, and thereby also avoid classification, and regulation, as a major source within the meaning of Code §3-3-203, Permittee shall:

1. Permittee shall produce no more than 15,292 tons of foam product from Lines 1-3 in any 12 month period, and no more than 1,784 tons per month.

2. For the inkjet printer, Permittee shall only use water-based inks.

6. Emission Limitations and Controls

A. Applicable Limitations
(Code §3-1-082)

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

B. Allowable Emissions

1. General Limitation
[Code § 3-1-081.A.2. (as amended 10/12/95)]

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

2. Insignificant Activities
(Code §§1-3-140.74a, 3-1-040.B.2.a.i, 3-1-050)

Apart from the authority of this permit, Permittee is authorized to discharge or cause to discharge into the atmosphere emissions from insignificant activities, as defined in Code §1-3-140.74a.

C. Particulate Emissions - Opacity Limits

1. SIP Limitation
[Federally enforceable pursuant to PGAQCD Reg. 7-3-1.1 (6/16/80) approved as a SIP Element at 47 FR 15579 (4/12/82)]

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.

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 60, Appendix A.

D. 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 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.

E. Surface Stabilization

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

1. Permittee shall not cause or allow visible fugitive dust emissions from open areas / vacant lots (areas not 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/ft^2 or allow the silt content to exceed 8% on unpaved lots greater than 5000 square feet.

8. Permittee shall stabilize unpaved lots greater than 5000 square feet by paving, applying a dust suppressant or graveling.

9. Permittee shall clean up trackout on a paved public roadway that exceeds 50 feet within 24 hours of discovery and limit opacity to 20% or less while using a rotary brush or broom.

10. Permittee shall make a record of the control measures applied.

F. Risk Management Program and Plan
(CAA §112r)), 40 CFR 68)

1. Permittee shall submit a complete risk management plan ("RMP"), or a revised RMP, to the District or other state or local agency designated by the state for this purpose, by such deadline as may be established under 40 CFR Part 68. The RMP submittal shall include a certification that the plan is complete and accurate;

2. Permittee shall submit any additional information required for completeness;

3. Permittee shall submit Annual certification of implementation of the risk management program as described by the RMP.

G. General Maintenance Obligation
(Code §§3-1-081.E., 8-1-030.A.3)

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

H. Additional Applicable Limitations

1. Asbestos NESHAP Compliance
[40 CFR Part 61, Subpart M] (Code §§7-1-030.A.8, 7-1-060)

Permittee shall comply with Code §§7-1-030.A.8 and 7-1-060 and 40 CFR Part 61, Subpart M, when conducting any renovation or demolition activities at the facility.

2. Stratospheric Ozone and Climate Protection
[40 CFR Part 82 Subpart F] (Code §§1-3-140.15, 1-3-140.58.k)

The permittee shall comply with the applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction.

7. Compliance Demonstration

A. Regular Emissions Monitoring

1. VOC monitoring
[Federally enforceable provision, pursuant to Code §3-1-084 (8/11/94)]

a. Production Rates

Within ten days of the end of every calendar month, Permittee shall log the aggregate amount of foam product produced in Lines 1-3 in the previous month

to determine whether it complies with the monthly and annual limits defined above.

b. Isobutane rate

1. Within ten days of the end of every calendar month, Permittee shall total and record the monthly amount of isobutane injected into the extruders of Lines 1-3, as logged by the isobutane meters.

2. Permittee shall compare the monthly and 12-month totals of Lines 1-3 to the isobutane use limitations of this permit to determine compliance.

3. Each month Permittee shall also record the monthly CO2 use.

4. Permittee shall maintain calibration certificates, indicating accuracy ranges or another indicator for accuracy, for the isobutane and CO2 meters.

c. VOC Emission Cap

1. Within ten days of the end of every calendar month, using the total production rates and the isobutane rate recorded as required by subsections a. and b., Permittee shall calculate and keep records of the 12-month rolling total VOC (isobutane) emissions.

2. If the calculations required by the previous paragraph show that VOC emissions from Lines 1-3 have reached 200 tons, Permittee shall begin calculating VOC emissions on a weekly basis until emissions are brought down below 200 tons, at which time Permittee may resume the monthly calculations.

3. If the calculations required by either subsection 1 or 2 above show that VOC emissions from Lines 1-3 have reached 230 tons, Permittee shall begin calculating VOC emissions on a daily basis until emissions are brought down below 230 tons, and weekly calculations shall be resumed as required by subsection 2.

4. VOC emissions shall be calculated using the following formula:

VOC (tpy) = isobutane used/yr - isobutane retained in product/yr

For purposes of these calculations, and any other compliance-related calculations, Permittee will either use an isobutane retention factor of 0.022 lb of isobutane retained/pound of final product, as determined by the on-site analysis conducted in 2006-2007, or a current isobutane retention factor determined from a laboratory analysis of actual isobutane retained in the products. A “current isobutane retention factor” is defined as one determined from an independent laboratory conducted during the previous calendar year quarter.

2. Particulate Matter Monitoring - Inspections
(Code §3-1-083)

To verify effective control of the baghouse and fabric filter, they shall be checked for visible emissions at least once daily during operations.

If visible emissions are observed during any of the checks, they shall be inspected and cleaned or repaired as necessary. Permittee shall maintain records of these inspections, the cause for the visible emissions and the corrective measures taken.

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

Permittee shall maintain records of:

1. All data and calculations used to determine VOC emissions.

2. Laboratory analysis showing actual isobutane retention results. These records shall be submitted with the Annual Emission Inventory report as described in Section §8.B of this permit.

3. All information required pursuant to any federally enforceable provision of this permit, recorded in a permanent form suitable for inspection.

4. 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."

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

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

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

Permittee shall annually submit a certification of compliance with the provisions of this permit. The certification shall be separately submitted to both the District and to the Enforcement Office (AIR 5), EPA Region IX, 75 Hawthorne Street, San Francisco, CA 94105-3901. The certification shall:

1. Be signed by a responsible official, namely the proprietor, a general partner, the president, secretary, treasurer or vice-president of the corporation, or such other person as may be approved by the Control Officer as an administrative amendment to this permit;

2. Identify each term or condition of the permit that is the basis of the certification;

3. Verify the compliance status with respect to each such term or condition;

4. Verify whether compliance with respect to each such term or condition has been continuous or intermittent;

5. Identify the permit provision, or other, compliance mechanism upon which the certification is based; and

6. Be postmarked within thirty (30) days of the start of each calendar year.

8. Other Reporting Obligations

A. Deviations from Permit Requirements
(Code §3-1-81.A.5.b.)

Permittee shall report any deviation from the requirements of this permit along with the probable cause for such deviation, and any corrective actions or preventative measures taken to the District within ten days of the deviation unless earlier notification is required by the provisions of this permit.

B. Annual Emissions Inventory
[Code §3-1-103. (Nov. '93)]

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

9. 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.

10. 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 §3-1-050)

Expiration of this permit will terminate the facility's right to operate unless either a timely application for renewal has been submitted in accordance with §§3-1-050, 3-1-055 and 3-1-060, or a substitute application for a general permit under §3-5-490. For Class I permit renewals, a timely application is one that is submitted at least 6 months, but not greater than 18 months prior to the date of the permit expiration. For Class II or Class III permit renewals, a timely application is one that is submitted at least 3 months, but not greater than 12 months prior to the date of permit expiration.

J. Severability
(Code §3-1-081.A.7)

The provisions of this permit are severable, and if any provision of this permit is held invalid the remainder of this permit shall not be affected thereby.

K. Permit Shield
(Code § 3-1-102.)

1. Compliance with the terms of this permit shall be deemed compliance with any applicable requirement identified in this permit.

2. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

L. Permit Revisions
(Code Chapter 3, Article 2)

1. This permit may be revised, reopened, revoked and reissued, or terminated for cause. Other than as expressly provided in Code Chapter 3, Article 2, the filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, or of a

notification of planned changes or anticipated noncompliance does not stay any permit condition.

2. The permittee shall furnish to the Control Officer, within a reasonable time, any information that the Control officer may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating the permit or to determine compliance with the permit.

3. Permit amendments, permit revisions, and changes made without a permit revision shall conform to the requirements in Article 2, Chapter 3, of the Code.

4. Should this source become subject to a standard promulgated by the Administrator pursuant to CAA §112(d), then Permittee shall, within twelve months of the date on which the standard is promulgated, submit an application for a permit revision demonstrating how the source will comply with the standard. (Code §3-1-050.C.5)

5. Revision to Permit Provisions Designated as Federally Enforceable Pursuant to Code §3-1-084
[Federally enforceable provision, pursuant to Code §3-1-084 (8/11/94)]

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

M. Permit Re-opening
(Code §3-1-087.)

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

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

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

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

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

P. Excess Emission Reports; Emergency Provision

(Code §3-1-081.E, Code §8-1-030)

1. To the extent Permittee may wish to offer a showing in mitigation of any potential penalty, underlying upset events resulting in excess emissions shall reported as follows:

    a. The permittee shall report to the Control Officer any emissions in excess of the limits established by this permit. Such report shall be in two parts:

        i. Notifications by telephone or facsimile within 24 hours or the next business day, whichever is later, of the time when the owner or operator first learned of the occurrence of excess emissions, including all available information required under subparagraph b. below.

        ii. Detailed written notification within 3 working days of the initial occurrence containing the information required under subparagraph b. below.

    b. The excess emissions report shall contain the following information:

        i. The identity of each stack or other emission point where the excess emissions occurred.

        ii. The magnitude of the excess emissions expressed in the units of the applicable limitation.

        iii. The time and duration or expected duration of the excess emissions.

        iv. The identity of the equipment from which the excess emissions occurred.

        v. The nature and cause of such emissions.

        vi. If the excess emissions were the result of a malfunction, steps taken to remedy the malfunction and the steps taken or planned to prevent the recurrence of such malfunctions.

        vii. The steps that were or are being taken to limit the excess emissions. To the extent this permit defines procedures governing operations during periods of start-up or malfunction, the report shall contain a list of steps taken to comply with this permit.

        viii. To the extent excess emissions are continuous or recurring, the initial notification shall include an estimate of the time the excess emissions will continue. Continued excess emissions beyond the estimated date will require an additional notification.

2. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

3. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of the following subparagraph are met.

4. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

   a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;

   b. The permitted facility was at the time being properly operated;

   c. During the period of emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and

   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.

11. Facility Specific Data

A. Equipment

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

Equipment	Quantity	Capacity	Manufacturer	Model #	Date of Installation/ Modification.
Extruder	1	2,400 lb/hr	Davis Standard	n/a	2010
Extruder	1	2,400 lb/hr	Davis Standard	n/a	2011
Extruders	1	2,400 lb/hr	Davis Standard	n/a	Not installed yet
Thermoformer, stamping machine w/grinder	3	165 ft/min	Irwin Research	50 VTS	2010
Thermoformer, stamping machine w/grinder	3	165 ft/min	Irwin Research	50 VTS	2011
Thermoformer, stamping machine w/grinder	3	165 ft/min	Irwin Research	50 VTS	Not installed yet
Pneumatic Pellet Unloading/Vacuum system, equipped with fabric filter	1	6,000 lb/hr	Premier Pneumatics	#CO108242	2010
Pneumatic Pellet Unloading/Vacuum system, equipped with fabric filter	1	6,000 lb/hr	Premier Pneumatics	#C0108242	2010

Equipment	Quantity	Capacity	Manufacturer	Model #	Date of Installation/ Modification.
Skeleton Surge Hopper Baghouse	2	1000 scfm	Torit	36 PJD	2010
Skeleton Surge Hopper Baghouse	2	1000 scfm	Torit	36 PJD	2011
Skeleton Surge Hopper Baghouse	2	1000 scfm	Torit or similar	36 PJD or similar	Not installed yet
Scrap Grinder	1	100 lb/hr	Irwin Research	50 CLS	2010
Scrap Grinder	1	100 lb/hr	Irwin Research	50 CLS	2011
Scrap Grinder	1	100 lb/hr	Irwin Research	50 CLS or similar	Not installed yet
Isobutane pressurized tank	1	30,000 gallons	East Fab Inc.	31000 WC	2010

B. Insignificant Activities:

- Laminating Extruder (uses no blowing agent).

Appendix A **Semi-annual Report**

Permit V20689.000

Abstract

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

Facility - Republic Plastics Eloy Foam Manufacturing Plant
1550 West Battaglia Road, Eloy, AZ

Reporting Period - January-June___ Or July-December __ Year _____

Material Usage/Produced & VOC Emissions from Lines 1-3

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec
Foam Product Produced (tons)												
Isobutane Injected (tons)												
CO2 Injected (tons)												
VOC emissions (tons)												

NOTE: If at any point during the reporting period, Permittee had to conduct weekly or daily VOC calculations, as required by the permit, a summary of those calculations shall be attached to their semi-annual report.

Emissions Calculations

Did any rolling average of VOC emissions from Lines 1-3 exceed the §5.A permit limit of 240 tons for any 12-month period? .....Yes __ No __

Did the isobutene use exceed the §5.B limit of 576 tons in any 12-month period or 67 tons in any month? .....Yes __ No __

Did the product produced exceed the §5.C.1 limit of 15,292 tons of foam in any 12-month period or 1784 tons in any month? .....Yes __ No __

Were only water-based inks used in the ink-jet printer as limited by §5.C.2? .....Yes __ No __

Operational Inspections

Were open areas / vacant lots and unpaved lots maintained pursuant to §6.E? .....Yes __ No __

Have the required fabric filter and baghouse inspections and recordkeeping been conducted pursuant to §7.A.2? .....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

Mail to - Pinal County Air Quality Control District
PO Box 987
Florence, AZ 85132