



ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY CLASS II SYNTHETIC MINOR PERMIT

PERMITTEE: W.L. Gore & Associates, Inc.
FACILITY: W.L. Gore & Associates, Inc.
PERMIT #: 63419
DATE ISSUED:
EXPIRY DATE:

SUMMARY

This Class II, operating permit renewal is issued to W.L. Gore & Associates, the Permittee, for the operation of its medical products manufacturing facility located at the Woody Mountain Campus in Flagstaff, Coconino County, Arizona. This permit renews and supersedes operating permit #52794.

The facility manufactures medical devices from fluoropolymers. The basic manufacturing process uses fluoropolymer powder, blends it with a liquid extrusion aid, and forms it into various shapes. The fluoropolymer billet is then placed into a paste extruder where the material is extruded into an intermediate or final shape. Final processing or assembly steps occur after the extrusion aid is volatilized from the fluoropolymer.

The company has accepted voluntary limits for the emissions of volatile organic compounds (VOC) and hazardous air pollutants (HAPs) to stay below major source thresholds. Arizona Administrative Code (A.A.C.) R18-2-302 requires a Class II permit for this facility. Additionally, because of the voluntary limitations accepted by the facility for the operation of its process equipment, the facility is categorized as a "synthetic minor". This permit is issued in accordance with the applicable requirements in the Arizona Administrative Code.

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 40 Code of Federal Regulations (CFR).

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ATTACHMENT "A": GENERAL PROVISIONS

Air Quality Control Permit No. 63419 For W.L. Gore & Associates, Inc.

I. PERMIT EXPIRATION AND RENEWAL

[ARS § 49-426.F, A.A.C. R18-2-304.C.2, and -306.A.1]

- A. This permit is valid for a period of five years from the date of issuance.
- B. The Permittee shall submit an application for renewal of this permit at least 6 months, but not more than 18 months, prior to the date of permit expiration.

II. COMPLIANCE WITH PERMIT CONDITIONS

[A.A.C. R18-2-306.A.8.a and b]

- 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 and air quality rules under Title 18, Chapter 2 of the Arizona Administrative Code. Any 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.
- 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.

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

[A.A.C. R18-2-306.A.8.c, -321.A.1, and -2]

- 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.
- B. The permit shall be reopened and revised under any of the following circumstances
 1. The Director or the 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.
 2. The Director or the Administrator determines that the permit needs to be revised or revoked to assure compliance with the applicable requirements.
- C. Proceedings to reopen and reissue 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 reopenings shall be made as expeditiously as practicable. Permit reopenings shall not result in a resetting of the five-year permit term.

IV. POSTING OF PERMIT

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

- A.** The Permittee shall post this permit or a certificate of permit issuance where the facility is located 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:
1. Current permit number; or
 2. Serial number or other equipment ID number that is also listed in the permit to identify that piece of equipment.
- B.** A copy of the complete permit shall be kept on site.

V. FEE PAYMENT

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

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

VI. ANNUAL EMISSION INVENTORY QUESTIONNAIRE

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

- A.** The Permittee shall complete and submit to the Director an annual emissions inventory questionnaire. The questionnaire is due by March 31st or ninety days after the Director makes the inventory form available each year, whichever occurs later, and shall include emission information for the previous calendar year.
- B.** The questionnaire shall be on a form provided by the Director and shall include the information required by A.A.C. R18-2-327.

VII. COMPLIANCE CERTIFICATION

[A.A.C. R18-2-309.2.a, c, d, and 5.d]

- A.** The Permittee shall submit a compliance certification to the Director semiannually, which describes the compliance status of the source with respect to each permit condition. The certifications shall be submitted no later than February 15th and August 15th. The February 15th compliance certification shall report the compliance status of the source during the period between July 1st and December 31st of the previous year. The August 15th compliance certification shall report the compliance status of the source during the period between January 1st and June 30th of the current year.

The compliance certifications shall include the following:

1. Identification of each term or condition of the permit that is the basis of the certification;
2. The identification of the methods or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period;
3. The 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 certification shall be based on the methods or means designated in Condition VII.A.2. The certifications shall

identify each deviation and take it into account for consideration in the compliance certification;

4. All instances of deviations from permit requirements reported pursuant to Condition XII.B of this Attachment; and
5. Other facts the Director may require determining the compliance status of the source.

- B.** A progress report on all outstanding compliance schedules shall be submitted every six months beginning with six months after permit issuance.

VIII. CERTIFICATION OF TRUTH, ACCURACY AND COMPLETENESS

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

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.

IX. INSPECTION AND ENTRY

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

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;
- B.** Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;
- C.** Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
- D.** Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements; and
- E.** Record any inspection by use of written, electronic, magnetic and photographic media.

X. PERMIT REVISION PURSUANT TO FEDERAL HAZARDOUS AIR POLLUTANT STANDARD

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

If this source becomes subject to a standard promulgated by the Administrator pursuant to Section 112(d) of the Act, then the 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.

XI. ACCIDENTAL RELEASE PROGRAM

[40 CFR Part 68]

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.

XII. EXCESS EMISSIONS, PERMIT DEVIATIONS, AND EMERGENCY REPORTING

A. Excess Emissions Reporting

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

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:

- (1) Notification by 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.
- (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).

b. The report shall contain the following information:

- (1) Identity of each stack or other emission point where the excess emissions occurred;
- (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;
- (3) Date, time and duration, or expected duration, of the excess emissions;
- (4) Identity of the equipment from which the excess emissions emanated;
- (5) Nature and cause of such emissions;
- (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; and
- (7) Steps taken to limit the excess emissions. 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.

2. In the case of continuous or recurring excess emissions, the notification requirements of this section 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.

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

B. Permit Deviations Reporting

[A.A.C. R18-2-306.A.5.b]

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. Prompt reporting shall mean that the report was submitted to the Director by certified mail, facsimile, or hand delivery within two working days of the time when emission limitations were exceeded due to an emergency or within two working days of the time when the owner or operator first learned of the occurrence of a deviation from a permit requirement.

C. Emergency Provision

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

1. An “emergency” means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, that require 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.
2. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if Condition XII.C.3 is met.
3. 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 being properly operated at the time;
 - c. During the period of the 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 Director by certified mail, facsimile, or hand delivery within two working days of the time when emission limitations were exceeded due to the emergency. This notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective action taken.

4. In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.

D. Compliance Schedule

[ARS § 49-426.1.5]

For any excess emission or permit deviation that cannot be corrected within 72 hours, the Permittee is required to submit a compliance schedule to the Director within 21 days of such occurrence. The compliance schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with the permit terms or conditions that have been violated.

E. Affirmative Defenses for Excess Emissions due to Malfunctions, Startup, and Shutdown

[A.A.C. R18-2-310]

1. Applicability

This rule establishes affirmative defenses for certain emissions in excess of an emission standard or limitation and applies to all emission standards or limitations except for standards or limitations:

- a. Promulgated pursuant to Sections 111 or 112 of the Act;
- b. Promulgated pursuant to Titles IV or VI of the Clean Air Act;
- c. Contained in any Prevention of Significant Deterioration (PSD) or New Source Review (NSR) permit issued by the U.S. EPA;
- d. Contained in A.A.C. R18-2-715.F; or
- e. Included in a permit to meet the requirements of A.A.C. R18-2-406.A.5.

2. Affirmative Defense for Malfunctions

Emissions in excess of an applicable emission limitation due to malfunction shall constitute a violation. When emissions in excess of an applicable emission limitation are due to a malfunction, the Permittee has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the Permittee has complied with the reporting requirements of A.A.C. R18-2-310.01 and has demonstrated all of the following:

- a. The excess emissions resulted from a sudden and unavoidable breakdown of process equipment or air pollution control equipment beyond the reasonable control of the Permittee;
- b. The air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;

- c. If repairs were required, the repairs were made in an expeditious fashion when the applicable emission limitations were being exceeded. Off-shift labor and overtime were utilized where practicable to ensure that the repairs were made as expeditiously as possible. If off-shift labor and overtime were not utilized, the Permittee satisfactorily demonstrated that the measures were impracticable;
- d. The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;
- e. All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;
- f. The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance;
- g. During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in Title 18, Chapter 2, Article 2 of the Arizona Administrative Code that could be attributed to the emitting source;
- h. The excess emissions did not stem from any activity or event that could have been foreseen and avoided, or planned, and could not have been avoided by better operations and maintenance practices;
- i. All emissions monitoring systems were kept in operation if at all practicable; and
- j. The Permittee's actions in response to the excess emissions were documented by contemporaneous records

3. Affirmative Defense for Startup and Shutdown

- a. Except as provided in Condition XII.E.3.b, and unless otherwise provided for in the applicable requirement, emissions in excess of an applicable emission limitation due to startup and shutdown shall constitute a violation. When emissions in excess of an applicable emission limitation are due to startup and shutdown, the Permittee has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the Permittee has complied with the reporting requirements of A.A.C. R18-2-310.01 and has demonstrated all of the following:
 - (1) The excess emissions could not have been prevented through careful and prudent planning and design;
 - (2) If the excess emissions were the result of a bypass of control equipment, the bypass was unavoidable to prevent loss of life, personal injury, or severe damage to air pollution control equipment, production equipment, or other property;

- (3) The air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
 - (4) The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;
 - (5) All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;
 - (6) During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in Title 18, Chapter 2, Article 2 of the Arizona Administrative Code that could be attributed to the emitting source;
 - (7) All emissions monitoring systems were kept in operation if at all practicable; and
 - (8) Contemporaneous records documented the Permittee's actions in response to the excess emissions.
- b. If excess emissions occur due to a malfunction during routine startup and shutdown, then those instances shall be treated as other malfunctions subject to Condition XII.E.2.
4. Affirmative Defense for Malfunctions during Scheduled Maintenance

If excess emissions occur due to a malfunction during scheduled maintenance, then those instances will be treated as other malfunctions subject to Condition XII.E.2.

5. Demonstration of Reasonable and Practicable Measures

For an affirmative defense under Condition XII.E.2 or XII.E.3, the Permittee shall demonstrate, through submission of the data and information required by Condition XII.E and A.A.C. R18-2-310.01, that all reasonable and practicable measures within the Permittee's control were implemented to prevent the occurrence of the excess emissions.

XIII. RECORD KEEPING REQUIREMENTS

[A.A.C. R18-2-306.A.4]

- 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;
 2. The date(s) analyses were performed;
 3. The name of the company or entity that performed the analyses;

4. A description of the analytical techniques or methods used;
 5. The results of such analyses; and
 6. The operating conditions as existing at the time of sampling or measurement.
- B.** The Permittee shall retain records of all required monitoring data and support information for a period of at least 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.
- C.** All required records shall be maintained either in an unchangeable electronic format or in a handwritten logbook utilizing indelible ink.

XIV. REPORTING REQUIREMENTS

[A.A.C. R18-2-306.A.5.a]

The Permittee shall submit the following reports:

- A.** Compliance certifications in accordance with Section VII of Attachment "A".
- B.** Excess emission; permit deviation, and emergency reports in accordance with Section XII of Attachment "A".
- C.** Other reports required by any condition of Attachment "B".

XV. DUTY TO PROVIDE INFORMATION

[A.A.C. R18-2-304.G and -306.A.8.e]

- 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 Administrator along with a claim of confidentiality.
- 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.

XVI. PERMIT AMENDMENT OR REVISION

[A.A.C. R18-2-317.01, -318, -319, and -320]

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, as follows:

- A.** Facility Changes that Require a Permit Revision - Class II (A.A.C. R18-2-317.01);
- B.** Administrative Permit Amendment (A.A.C. R18-2-318);

- C. Minor Permit Revision (A.A.C. R18-2-319); and
- D. Significant Permit Revision (A.A.C. R18-2-320).

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

XVII. FACILITY CHANGE WITHOUT A PERMIT REVISION

[A.A.C. R18-2-306.A.4 and -317.02]

- 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 Conditions XVII.B and XVII.C, a change at a Class II source shall not be subject to revision, notice, or logging requirements under this Section.
- B. Except as otherwise provided in the conditions applicable to an emissions cap created under A.A.C. R18-2-306.02, the following changes may be made if the source keeps on site records of the changes according to Appendix 3 of the Arizona Administrative Code:
 - 1. Implementing an alternative operating scenario, including raw materials changes;
 - 2. Changing process equipment, operating procedures, or making any other physical change if the permit requires the change to be logged;
 - 3. Engaging in any new insignificant activity listed in A.A.C. R18-2-101.68.a through g but not listed in the permit;
 - 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
 - 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.
- C. Except as provided in the conditions applicable to an emissions cap created under A.A.C. R18-2-306.02, the following changes may be made if the source provides written notice to the Department in advance of the change as provided below:
 - 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: 7 days. The Director may require verification of efficiency of the new equipment by performance tests;
 - 2. A physical change or change in the method of operation that increases actual emissions more than 10% of the major source threshold for any conventional pollutant but does not require a permit revision: 7 days;
 - 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;

4. A change that would trigger an applicable requirement that already exists in the permit: 30 days unless otherwise required by the applicable requirement;
5. A change that amounts to reconstruction of the source or an affected facility: 7 days. For the 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% 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
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% of the applicable major source threshold for that pollutant.

D. For each change under Condition XVII.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:

1. When the proposed change will occur;
2. A description of the change;
3. Any change in emissions of regulated air pollutants; and
4. Any permit term or condition that is no longer applicable as a result of the change.

E. A source may implement any change in Condition XVII.C without the required notice by applying for a minor permit revision under A.A.C. R18-2-319 and complying with subsection A.A.C. R18-2-319.D.2 and G.

F. 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 XVII.B.1.

G. 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 same source under this Section over the term of the permit, constitutes a change under subsection A.A.C. R18-2-317.01.A.

H. If a source change is described under both Conditions XVII.B and C, the source shall comply with Condition XVII.C. If a source change is described under both, Condition XVII.C and A.A.C. R18-2-317.01.B, the source shall comply with A.A.C. R18-2-317.01.B.

I. A copy of all logs required under Condition XVII.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.

J. Logging Requirements

[A.A.C. R18-2-306.A.4]

1. Each log entry required by a change under Condition XVII.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 provision of A.A.C. R18-2-317.02.B that authorizes the change to be made with logging.
 - 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 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.

XVIII. TESTING REQUIREMENTS

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

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

B. Operational Conditions during Testing

Tests shall be conducted during operation at the maximum possible capacity of each unit under representative operational conditions unless other conditions are required by the applicable test method or in this permit. With prior written approval from the Director, testing may be performed at a lower rate. Operations during periods of start-up, shutdown, and malfunction (as defined in A.A.C. R18-2-101) shall not constitute representative operational conditions unless otherwise specified in the applicable standard.

C. 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.

D. Test Plan

At least 14 calendar days prior to performing a test, the Permittee shall submit a test plan to the Director in accordance with A.A.C. R18-2-312.B and the Arizona Testing Manual. This test plan must include the following:

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:

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

G. Report of Final Test Results

A written report of the results of all performance tests shall be submitted to the Director within 30 days after the test is performed. The report shall be submitted in accordance with the Arizona Testing Manual and A.A.C. R18-2-312.A.

XIX. PROPERTY RIGHTS

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

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

XX. SEVERABILITY CLAUSE

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

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.

XXI. PERMIT SHIELD

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

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 XVI.B and any facility changes without a permit revision pursuant to Section XVII.

XXII. PROTECTION OF STRATOSPHERIC OZONE

[40 CFR Part 82]

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

**XXIII. APPLICABILITY OF NEW SOURCE PERFORMANCE STANDARDS (NSPS)/
NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS
(NESHAP) GENERAL PROVISIONS**

[40 CFR Part 60 and Part 63]

For all equipment subject to a NSPS or a NESHAP, 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 Regulations.

ATTACHMENT "B": SPECIFIC CONDITIONS

Air Quality Control Permit No. 63419 for W.L. Gore & Associates, Inc.

I. FACILITY WIDE LIMITATIONS

- A.** The Permittee shall have on site or on call a person certified in EPA Reference Method 9 unless all Method 9 observations or instantaneous visual observations required by this permit are conducted as Alternative Method-082 (Digital Camera Operating Technique). The Permittee shall certify the camera and the associated software in accordance with ALT-082 procedures. Any Method 9 test or instantaneous visual survey required by this permit can be conducted as ALT-082. The results of a Method 9 observation or any individual instantaneous visual observation conducted as ALT-082 shall be obtained within 30 minutes of completing the Method 9 observation or individual instantaneous visual observation.
- [A.A.C. R18-2-306.A.3.c]
- B.** At the time that the compliance certifications required by Section VII of Attachment "A" are submitted, the Permittee shall submit reports of all monitoring activities required by Attachment "B" performed during the compliance term.
- [A.A.C. R18-2-306.A.5.a]
- C.** The Permittee shall keep a log of the maintenance activities at the facility performed on air pollution control devices and process equipment that could impact air emissions.
- [A.A.C. R18-2-306.A.3.c]

II. PRODUCTION LINES

A. Applicability

This Section applies to all the production lines, electro polishing lines, extruders, and solvent drying ovens listed in Equipment List, Attachment "C".

B. Particulate Matter and Opacity

1. Emission Limitations/ Standards

- a. In any one hour period, the Permittee shall not cause, allow or permit the discharge of particulate matter into the atmosphere in excess of the amounts calculated by the following equation:

For process sources having a process weight rate of 60,000 pounds per hour (30 tons per hour) or less, the maximum allowable emissions shall be determined by the following equation:

[A.A.C. R18-2-730.A.1.a]

$$E = 4.1 P^{0.67}$$

Where:

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

P = the process weight rate in tons-mass per hour.

- b. When applying the process weight rate equation, the Permittee shall utilize the total process weight from all similar units employing a similar type process to determine the maximum allowable emissions of particulate matter.

[A.A.C. R18-2-730.B]

- c. The Permittee shall not cause, allow, or permit visible emissions in excess of 20 percent opacity.

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

2. Permit Shield

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

Compliance with the conditions of this section shall be deemed compliance with A.A.C. R18-2-702.B, -730.A.1, and B.

C. Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs)

1. Emission Limitations/ Standards

- a. The Permittee shall not cause the emissions of VOCs from the facility to exceed 70 tons for any rolling 12-month period.

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

[Material Permit Condition identified by underline and italics]

- b. The Permittee shall not cause HAP emissions at the facility for any rolling 12-month period to exceed:

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

[Material Permit Condition identified by underline and italics]

(1) Seven (7) tons of any single HAP; or

(2) Eighteen (18) tons of any combination of HAPs.

- c. The Permittee shall not emit gaseous or odorous materials from equipment, operations or premises in quantities or concentrations as to cause air pollution.

[A.A.C. R18-2-730.D]

- d. Materials including solvents or other volatile compounds shall not be processed, stored, used and transported in such a manner and by such means that they will evaporate, leak, escape or be otherwise discharged into the ambient air so as to cause or contribute to air pollution. Where means are available to reduce effectively the contribution to air pollution from evaporation, leakage or discharge, the installation and use of such control methods, devices or equipment shall be applied when practicable.

[A.A.C. R18-2-730.F]

- e. Where a stack, vent or other outlet is at such a level that odor, smoke, vapor or any combination thereof constituting air pollution is discharged to adjoining property, the Director may require the installation of abatement equipment or the alteration of such stack, vent or other outlet by the Permittee to a degree that will adequately dilute, reduce or eliminate the discharge of air pollution into adjoining property.
[A.A.C. R18-2-730.G]

2. Monitoring and Recordkeeping requirements

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

- a. The Permittee shall maintain records of all purchase orders and invoices associated with the purchasing and procurement of all VOC containing materials used at the facility, except those associated with trivial and insignificant activities.
- b. The Permittee shall maintain records of the safety data sheets (SDS) for all manufacturing materials containing VOCs consumed at the facility.
- c. The Permittee shall maintain monthly records of all VOC containing waste material shipped off site under manifest as well as the corresponding VOC content of the waste material.
- d. The Permittee shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application and make them available for inspection upon request.
- e. At the end of each semi-annual period, a 12-month total of VOC emissions (in tons per year) shall be calculated and recorded to show compliance with Condition II.C.1.a.
- f. The emissions shall be determined by the following equation:

$$VOC_{emitted} = VOC_{beg} + VOC_{trans} - VOC_{end} - VOC_{waste}$$

$VOC_{emitted}$ = The amount of VOCs emitted from the facility in that 12-month period (in tons).

VOC_{beg} = The amount of reportable VOCs contained in all materials at the facility at the beginning of the 12-month period. This can be determined by multiplying the weight of the VOC containing materials at the beginning of the 12-month period with the percent by weight of the VOC constituents in those materials.

VOC_{trans} = The amount of reportable VOCs contained in all materials purchased or transferred to the facility for that 12-month period. This can be determined by multiplying the weight of the VOC containing materials transferred or purchased in that 12-month period with the percent by weight of the VOC constituents in those materials.

VOC_{end} = The amount of reportable VOCs contained in all materials at the facility at the end of the 12-month period. This can be determined by multiplying the weight of the VOC containing materials at the end of the 12-month period with the percent by weight of the VOC constituents in those materials.

VOC_{waste} = The amount of reportable VOCs contained in the waste material removed from the facility for that 12-month period. This can be determined by multiplying the weight of the materials removed as waste from the facility for that 12-month period with the percent by weight of the VOC constituents in those materials.

g. The Permittee shall keep a record of the following to demonstrate compliance with Condition II.C.1.b:

- (1) Mass of all HAP containing materials used;
- (2) The safety data sheets (SDS) showing the mass fraction of HAPs present.

h. At the time when the semi-annual compliance certifications are due, the Permittee shall submit reports of the 12-month totals for VOC and HAPs emissions for the facility.

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

3. Permit Shield

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

Compliance with the conditions of this section shall be deemed compliance with A.A.C. R18-2-730.D, F, and G.

III. BOILERS, HUMIDIFIERS, HEATERS, AND GAS-FIRED OVENS

A. Applicability

This Section applies to all the boilers, humidifiers, heaters, and gas-fired ovens listed in Equipment List, Attachment "C".

B. Fuel Limitation

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

The Permittee shall only burn natural gas in the boilers, humidifiers, heaters, and gas fired ovens.

C. Particulate Matter and Opacity

1. Emission Limitations/ Standards

[A.A.C. R18-2-724.C.1]

a. The Permittee shall not cause, allow or permit the emission of particulate matter, caused by combustion of fuel in the boilers in excess of the amounts calculated 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.

- b. For purposes of this Section, 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. The Permittee shall not cause, allow or permit the opacity of any plume or effluent from any boiler to exceed 15 percent.

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

2. Monitoring, Recordkeeping, and Reporting

- a. The Permittee shall keep records of fuel supplier certifications. The certification shall contain information regarding the name of fuel supplier and lower heating value of the fuel. These records shall be made available to ADEQ upon request.

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

- b. The Permittee shall report all 6-minute periods during which the visible emissions exceed 15 percent opacity, as required under Section XII of Attachment "A".

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

3. Permit Shield

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

Compliance with the conditions of this section shall be deemed compliance with A.A.C. R18-2-724.B, C.1, and J.

IV. INTERNAL COMBUSTION ENGINES (ICEs)

A. Applicability

This Section applies to ICEs listed in Equipment List, Attachment "C". These are emergency use engines and shall be used to provide back-up power when commercial power supply is interrupted.

B. Fuel Limitation

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

1. The Permittee shall burn only natural gas in all the ICEs except SCEG ICE (535 HP).

2. The Permittee shall burn only diesel fuel in SCEG ICE (535 HP).

C. ICES not subject to New Source Performance Standards (NSPS)

1. Applicability

This Section applies to ICES marked as 'No' under the NSPS Applicable column in the Equipment List, Attachment "C".

2. Particulate Matter

a. Emission Limitation/ Standards

- (1) The Permittee shall not cause, allow or permit the emission of particulate matter, caused by combustion of fuel in excess of the amounts calculated by the following equation:

[A.A.C. R18-2-719.C.1]

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

Where:

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

Q = the heat input in million BTU per hour.

- (2) For the purpose of this Section, 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 operating 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. R18-2-719.B]

b. Monitoring, Reporting, and Recordkeeping

[A.A.C. R18-2-719.I]

The Permittee shall maintain a record of the daily lower heating value of the fuel fired in the ICES. This may be accomplished by maintaining on record a copy of that part of the contract with the vendor that specifies the lower heating value of the fuel.

c. Permit Shield

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

Compliance with this section shall be deemed compliance with A.A.C.R18-2-719.B, C.1, and I.

3. Opacity

a. Emission Limitations and Standards

[A.A.C.R18-2-719.E]

The Permittee shall not cause, allow or permit to be emitted into the atmosphere from the ICEs, smoke for any period greater than ten consecutive seconds, which exceeds 40 percent opacity. Visible emissions when starting cold equipment shall be exempt from this requirement for the first ten minutes.

b. Monitoring, Reporting, and Recordkeeping

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

The Permittee shall conduct a quarterly survey of visible emissions emanating from the stack of each diesel fired ICE, when in operation. If the opacity of the emissions observed appears to exceed the standard, a Certified EPA Reference Method 9 observer shall conduct a certified EPA Reference Method 9 observation. The results of the Method 9 observation shall be recorded.

c. Permit Shield

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

Compliance with this Section shall be deemed compliance with A.A.C.R18-2-719.E.

4. Sulfur Dioxide (SO₂)

a. Emission Limitations and Standards

(1) The Permittee shall not cause to emit more than 1.0 pound of sulfur dioxide per million Btu heat input when low sulfur diesel fuel is fired.

[A.A.C. R18-2-719.F]

(2) The Permittee shall not fire high sulfur diesel fuel (greater than 0.9% sulfur) in the generators.

[A.A.C. R18-2-719.H]

b. Monitoring, Reporting, and Recordkeeping

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

The Permittee shall keep records of fuel supplier certification including the following information:

- (1) The name of the diesel supplier;
- (2) The heating value of diesel;
- (3) The sulfur content of diesel from which the shipment came; and
- (4) The method used to determine the sulfur content of the diesel

c. Permit Shield

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

Compliance with this Section shall be deemed compliance with A.A.C.R18-2-719.F and H.

D. ICEs subject to New Source Performance Standards, Subpart JJJJ

1. Applicability

[40 CFR 60.4230(a)(4)(iv)]

This Section applies to the ICEs marked as ‘Yes, Subpart JJJJ’ under the NSPS Applicable column in the Equipment List, Attachment “C”.

2. Emission Limitations

[40 CFR 60.4233(e)]

a. The Permittee shall comply with the following emission standards:

(1) Oxides of Nitrogen (NO_x)

Limit the emission of NO_x to 2.0 grams per horse-power hour (g/HP-hr) or 160 parts per million volume dry (ppmvd) at 15 percent O₂.

(2) Carbon Monoxide (CO)

Limit the emission of CO to 4.0 g/ HP-hr or 540 ppmvd at 15 percent O₂.

(3) Volatile Organic Compounds (VOCs)

Limit the emission of VOCs to 1.0 g/HP-hr or 86 ppmvd at 15 percent O₂.

b. The Permittee shall operate and maintain the engine to achieve the emission standards listed above over the entire life of the engine.

[40 CFR 60.4234]

3. Compliance Demonstration Requirements

a. The Permittee shall comply with the emission standards in Condition IV.D.2.a by purchasing an engine certified according to procedures specified in NSPS Subpart JJJJ for the same model year.

[40 CFR 60.4243(b)(1)]

b. The Permittee shall demonstrate compliance by keeping a maintenance plan and records of conducted maintenance.

[40 CFR 60.4243(a)(2)(ii)]

c. The Permittee shall, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions.

[40 CFR 60.4243(a)(2)(ii)]

- d. Emergency stationary ICEs may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. The Permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the Permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency ICE beyond 100 hours per year. Emergency stationary ICE may operate up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. For emergency engines, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year is prohibited.

[40 CFR 60.4243(d)]

- e. If the engine is a non-certified engine or is certified but has not been operated and maintained according to the manufacturer's written emission-related instructions, the Permittee shall perform initial performance testing as indicated in 40 CFR 60.4243. The Permittee is not required to conduct subsequent performance testing unless the stationary engine is rebuilt or undergoes major repair or maintenance. A rebuilt stationary SI ICE means an engine that has been rebuilt as that term is defined in 40 CFR 94.11(a).

[40 CFR 60.4243(f)]

- f. An air-to-fuel ratio (AFR) controller will be used with the operation of three-way catalysts/non-selective catalytic reduction. The AFR controller shall be maintained and operated appropriately in order to ensure proper operation of the engine and control device to minimize emissions at all times.

[40 CFR 60.4243(g)]

4. Monitoring, Recordkeeping, and Reporting Requirements

[40 CFR 60.4245(a)]

The Permittee shall keep records of the following:

- a. All notifications submitted to comply with this subpart and all documentation supporting any notification.
- b. Maintenance conducted on the engine.
- c. If the stationary SI ICE is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR Parts 90 and 1048.

- d. If the stationary SI ICE is not a certified engine or is a certified engine operating in a non-certified manner and subject to 40 CFR 60.4243(a)(2), documentation that the engine meets the emission standards.

5. Permit Shield

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

Compliance with this section shall be deemed compliance with 40 CFR 60.4230(a)(4)(iii), 4233(e), 4234, .4243(a)(2)(ii), (b)(1), (d), (e), (f), & (g), and 4245.

E. ICES Subject to National Emission Standards from Hazardous Air Pollutants (NESHAP)

1. Applicability

This Section applies to the ICES marked as 'Yes, Existing' under the NESHAP Applicable column in the Equipment List, Attachment "C".

[40 CFR 63.6590(a)(1)(iii) and (a)(2)(iii)]

2. Operating Limitations

- a. *The Permittee shall install a non-resettable hour meter on each ICE.*

[40 CFR 63.6625(f) and A.A.C. R18-2-331.A.3.a]

[Material Permit Conditions are indicated by underline and italics]

- b. The Permittee shall minimize the emergency ICES time at idle during startup and minimize the ICE's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

[40 CFR 63.6625(h)]

- c. The Permittee shall change oil and filter every 500 hours of operation or annually, whichever comes first. If the Permittee prefers to extend the oil change requirement, an oil analysis program must be performed every 500 hours of operation or annually, whichever comes first. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity and water content. The condemning limits for these parameters are as follows:

Total Base Number: changed less than 30 percent of Total Base Number of oil when new;

Viscosity: changed more than 20 percent from the viscosity of oil when new;

Water Content: changed more than 0.5 percent by volume

If all of the above limits are not exceeded, the Permittee is not required to change the oil. If any of the above limits are exceeded, the Permittee shall change the oil within 2 days of receiving the results of the analysis or before commencing operation, whichever is later. The analysis program shall be part of the maintenance plan for the operation of the ICE.

[40 CFR 63.6603(a); Table 2d of Subpart ZZZZ and 63.6625(i)]

- d. The Permittee shall inspect air cleaner every 1,000 hours of operation or annually, whichever comes first;
[40 CFR 63.6603(a); Table 2d of Subpart ZZZZ]
- e. The Permittee shall inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary
[40 CFR 63.6603(a); Table 2d of Subpart ZZZZ]
- f. The Permittee may operate the RICE for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Such operation is however, limited to no more than 100 hours per year. The Permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the Permittee maintains records indicating that the Federal, State, or local standards require maintenance and testing beyond 100 hours per year. Copies of records shall be made available to ADEQ upon request.
[40 CFR 63.6625(f)(ii)]
- g. The Permittee shall limit the operation of the RICE for non-emergency situations to no more than 50 hours per year, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing.
[40 CFR 63.6640(f)(i) & (iii)]
- h. The Permittee shall at all times operate and maintain the RICE in a manner consistent with safety and good air pollution control practices for minimizing emissions by following the manufacturer's instructions or implementing a maintenance plan.
[40 CFR 63.6605(b)]
- i. The requirements of NESHAP Subpart ZZZZ are met by the New Stationary RICE by meeting the requirements of 40 CFR Part 60, Subpart JJJJ.
[40 CFR 63.6590(c)(1)]

3. Recordkeeping Requirements

- a. The Permittee shall keep records of the hours of operation of the RICE that is recorded through the non-resettable hour meter. Records shall document hours spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.
[40 CFR 63.6655(f)]
- b. The Permittee shall keep records of the parameters that are analyzed and the results of the oil analysis, if any, and the oil changes for the engine.
[40 CFR 63.6625(i)]

- c. The Permittee shall keep records of the maintenance conducted on the CI RICE that demonstrates operation and maintenance of the CI RICE in accordance with your maintenance plan.

[40 CFR 63.6655(e)]

4. Permit Shield

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

Compliance with the conditions of this Part shall be deemed compliance with 40 CFR Part 6590 (a)(1)(iii), (2)(iii), (c)(1), 6595(a)(1), 6603 (a), 6605 (b), 6625 (f), (f)(ii), (h), (i), 6640 (f)(i), (f) (iii), 6655 (e) and (f), Table 2d of 40 CFR subpart ZZZZ.

V. CO-FIRED INCINERATOR

- A.** This Section applies to the co-fired incinerator listed in the Equipment List, Attachment “C”.

B. Particulate Matter and Opacity

1. Emission Limitations

- a. The Permittee shall not cause, allow or permit to be emitted into the atmosphere, from the co-fired incinerator, smoke, fumes, gases, particulate matter or other gas-borne material which exceeds 20 percent opacity, except during the times specified in Condition V.B.1.c.

[A.A.C.R18-2-704.A]

- b. The Permittee shall not cause, allow, or permit the discharge of particulate matter into the atmosphere in any one hour from the co-fired incinerator, in excess of 0.1 grain per cubic foot, based on dry flue gas at standard conditions, corrected to 12 percent carbon dioxide.

[A.A.C.R18-2-704.B]

- c. The co-fired incinerator shall be exempt from the opacity and emission requirements described in Conditions V.B.1.a and b for no more than 30 seconds in any 60-minute period.

[A.A.C.R18-2-704.D]

- d. *The Permittee shall only burn pathological & medical/ infectious waste. The loads shall not exceed 550 pounds per day and shall be burned in accordance with the manufacturer’s specifications.*

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

[Material permit conditions are indicated by underline and italics]

- e. *In the feedstock to the co-fired incinerator, the Permittee shall combust 10 percent or less of the medical and infectious wastes, as measured on a calendar quarter basis. For purposes of this definition, pathological waste, chemotherapeutic waste, and low-level radioactive waste are considered other wastes when calculating the percentage of medical/infectious waste combusted.*

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

[Material permit conditions are indicated by underline and italics]

2. Monitoring, Reporting, and Recordkeeping

a. The Permittee shall maintain a record of the daily charging rates and hours of operation of the co-fired incinerator.

[A.A.C. R18-2-704.E]

b. The Permittee shall keep records on a calendar quarter basis of the weight of medical and infectious waste burned, and the weight of all other fuels and wastes burned at the co-fired incinerator.

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

c. The Permittee shall conduct a quarterly survey of visible emissions emanating from the stack of the co-fired incinerator, when in operation. If the opacity of the emissions observed appears to exceed the standard, the a Certified EPA Reference Method 9 observer shall conduct a certified EPA Reference Method 9 observation. The results of the Method 9 observation shall be recorded.

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

3. Testing Requirements

[A.A.C.R18-2-312 and -734.F]

The Permittee shall perform a particulate matter test in the first year of the permit term to show compliance with the emission limit as specified in Section V.B.1.b. The Permittee shall use EPA reference Method 5 for conducting the test.

4. Permit Shield

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

Compliance with this section shall be deemed compliance with A.A.C.R18-2-704.A, B, D, E, and F.

VI. ETHYLENE OXIDE STERILIZATION AND AERATION CHAMBERS

A. Applicability

This Section applies to the Ethylene Oxide (ETO) Sterilizers listed in the Equipment List, Attachment "C".

B. ETO Usage and Record Keeping

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

1. The Permittee shall keep record of the daily usage of ETO in the sterilizers.

2. At the end of each month, the Permittee shall calculate and record the ETO usage and a rolling 12-month total of the ETO usage of the facility.

C. Emission Limitations/Standards

1. The Permittee shall reduce ETO emissions to the atmosphere by at least 99 percent from each sterilization chamber vent.

[40 CFR 63.362(c)]

2. If ETO usage is equal to or exceeds 10 tons in any rolling 12-month periods, the Permittee shall reduce ETO emissions to the atmosphere from each aeration room vent:

[40 CFR 63.362(d)]

- a. to a maximum concentration of 1 ppmv, or
- b. by at least 99 percent, whichever is less stringent.

3. Emission limits stated in Condition VI.C.1 and 2 apply during sterilization operation. The emission limitations do not apply during periods of malfunction.

[40 CFR 63.362 (b)]

D. Air Pollution Control Requirements

1. The Permittee shall operate and maintain, in accordance with manufacturer's specifications, an acid-water scrubber to capture and control ETO from the sterilization chamber evacuation gases.

[A.A.C. R18-2-306.A.2 and -331.A.3.e]

[Material permit conditions are indicated by underline and italics]

2. The Permittee shall operate and maintain, in accordance with manufacturer's specifications, a dry-bed reactor to capture and control ETO from the gases of the sterilization chamber exhaust that have previously been treated by the acid-water scrubber.

[A.A.C. R18-2-306.A.2 and -331.A.3.e]

[Material permit conditions are indicated by underline and italics]

3. If ETO usage is equal to or exceeds 10 tons in any rolling 12-month periods, the Permittee shall operate and maintain, in accordance with manufacturer's specifications, a dry-bed reactor to capture and control ETO from the aeration room exhaust.

[A.A.C. R18-2-306.A.2 and -331.A.3.e]

[Material permit conditions are indicated by underline and italics]

E. Testing Requirements

1. The Permittee, subject to emission standards listed in Condition VI.C, shall conduct performance test using the procedures and test methods listed in 40 CFR 63.7 and 40 CFR 63.365.

[40 CFR 63.363(a)(1)]

2. The Permittee shall complete the required performance test on the acid-water scrubber within 180 days of the issuance of the permit.

[40 CFR 63.363(a)(2)]

3. The Permittee shall complete the required performance test on the dry-bed reactor within 180 days after the ETO usage exceeds 10 tons in any 12-month period. The Permittee shall subsequently perform tests annually on the dry-bed reactor to show compliance with the emission limits specified in Condition VI.C.2.

4. The Permittee shall determine compliance with the emission limit as specified in Condition VI.C.1 from the sterilization vent and establish operating limits for the control device by carrying out the following:
 - a. Determine the efficiency of the acid-water scrubber by using the test methods and procedures listed in 40 CFR 63.365(b).
[40 CFR §63.363(b)(1)]
 - b. For each acid-water scrubber, establish as an operating limit either:
[40 CFR 63.363(b)(2)]
 - (1) The maximum ethylene glycol concentration using the procedures listed in 40 CFR 63.365(e)(1); or
 - (2) The maximum liquor tank level using the procedures listed in 40 CFR 63.365(e)(2).
5. The Permittee must demonstrate continuous compliance with each operating limit and work practice standard required under Condition VI.E.4, except during periods of startup, shutdown, and malfunction, according to the methods specified in 40 CFR 63.364.
[40 CFR 63.363 (f)]

F. Monitoring, Reporting, and Recordkeeping Requirements

1. The Permittee shall comply with the monitoring requirements in 40 CFR 63.8.
[40 CFR 63.364 (a)(1)]
2. All monitoring equipment shall be installed such that representative measurements of emissions or process parameters from the source are obtained. For monitoring equipment purchased from a vendor, verification of the operational status of the monitoring equipment shall include completion of the manufacturer's written specifications or recommendations for installation, operation, and calibration of the system.
[40 CFR 63.364(a)(2)]
3. For the acid-water scrubber, the Permittee shall either:
 - a. Sample the scrubber liquor and analyze and record, once per week, the ethylene glycol concentration of the scrubber liquor using the test methods and procedures in accordance with 40 CFR §63.365(e)(1); or
[40 CFR 63.364(b)(1)]
 - b. Measure and record once per week the level of the scrubber liquor in the recirculation tank. The owner or operator shall install, maintain, and use a liquid level indicator to measure the scrubber liquor tank level (i.e. a marker in the tank wall, a dipstick, a magnetic indicator etc.)
[40 CFR 63.364(b)(2)]
 - c. Monitoring under Condition VI.F.3.a or b is required only if the scrubber unit has been operated during the week.
[40 CFR §63.364(b)(1)&(2)]
4. For the dry-bed reactor, the Permittee shall monitor the following parameters:
[40 CFR 63.364(d) and A.A.C.R18-2-306.A.2]

a. ETO usage in the sterilizers

The dry bed reactor media shall be changed every time the ETO usage reaches 13,725 pounds.

b. Pressure drop across the dry-bed reactor

The dry-bed reactor shall be monitored daily so that the pressure drop across the unit does not exceed 14 inches of water column.

5. The Permittee shall comply with the recordkeeping requirements in 40 CFR 63.10(b) and (c), according to the applicability in Table 1 of 63.360. All records required to be maintained for this permit shall be maintained in such a manner that they can be readily accessed and are suitable for inspection. The most recent 2 years of records shall be retained onsite or shall be accessible to an inspector while onsite. The records of the preceding 3 years may be retained offsite. Records may be maintained in hard copy or computer-readable form including, but not limited to, on paper, microfilm, computer, computer disk, magnetic tape, or microfiche.

[40 CFR 63.367(a)]

6. The Permittee shall maintain records of the initial compliance test, subsequent compliance tests, data analysis, and on the occasion when the dry-bed reactor media is replaced and proof of replacement of media.

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

7. The source subject to emission limits as stated in Condition VI.C shall fulfill all reporting requirements listed in 40 CFR 63.10(a), (d), (e), and (f) according to the applicability in Table 1 of 40 CFR 63.360. These reports will be made to the ADEQ Director, at the appropriate address identified in 40 CFR 63.13.

[40 CFR 63.366(a)]

8. Required reports may be sent by U.S. mail, fax, or by another courier.

a. Submittal sent by U.S. mail shall be post marked on or before the specified date.

[40 CFR 63.366(a)(1)(i)]

b. Submittal sent by other methods shall be received by the Director on or before the specified date.

[40 CFR 63.366(a)(1)(ii)]

9. If acceptable to both the Director and the Permittee, reports may be submitted on electronic media.

[40 CFR 63.366(a)(2)]

10. The Permittee shall fulfill all requirements for construction or reconstruction of a source in 40 CFR 63.5, according to the applicability in Table 1 of 40 CFR 63.360 and listed in 40 CFR 63.366(b)(1).

[40 CFR 63.366(b)]

11. The Permittee shall fulfill all notification requirements in 40 CFR 63.9, as specified in the applicability table in 40 CFR 63.360, Subpart O.

[40 CFR 63.366(c)]

G. Test Methods and Procedures

1. The Permittee subject to emission standards listed in Condition VI.C shall comply with the performance testing requirements in 40 CFR 63.7.
[40 CFR 63.365(a)]
2. Efficiency at the sterilization chamber vent for emission limit stated in Condition VI.C.1 shall be calculated by using procedures listed in 40 CFR 63.365(b).
[40 CFR 63.365(b)]
3. Efficiency at the aeration room vent for emission limit stated in Condition VI.C.2 shall be measured by using procedures listed in 40 CFR 63.365(d).
[40 CFR 63.365(d)]
4. Concentration of ETO for complying with the emission standards stated in Condition VI.C shall be measured by using procedures outlined in 40 CFR 63.365(c).
[40 CFR 63.365(c)]
5. Baseline parameters for the acid-water scrubber for meeting the testing requirements listed under Condition VI.E.4 shall be determined by using the procedures listed in 40 CFR 63.365(e).
[40 CFR 63.365(e)]

H. Permit Shield

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

Compliance with the conditions of this Section shall be deemed compliance with 40 CFR 63.362 (b), (c), & (d); 363 (a)(1) & (2), (b) (1) & (2) and (f); 364 (a)(1) & (2), (b)(1) & (2), and (d); 365 (a), (b), (c), (d), and (e); 366 (a), (a)(1)(i) & (ii), (a)(2), (b), and (c); and 367(a).

VII. FUGITIVE DUST REQUIREMENTS

A. Applicability

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

B. Particulate Matter and Opacity

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

1. Emission Limitations/Standards
 - a. Opacity of emissions from any fugitive dust non-point source shall not be greater than 40 percent measured in accordance with the Arizona Testing Manual, Reference Method 9.
[A.A.C. R18-2-614]
 - b. The Permittee shall not cause, allow or permit visible emissions from any fugitive dust point source, in excess of 20 percent opacity.
[A.A.C. R18-2-702.B.3]

- c. The Permittee shall employ the following reasonable precautions to prevent excessive amounts of particulate matter from becoming airborne:
- (1) Keep dust and other types of air contaminants to a minimum in an open area where construction operations, repair operations, demolition activities, clearing operations, leveling operations, or any earth moving or excavating activities are taking place, by good modern practices such as using an approved dust suppressant or adhesive soil stabilizer, paving, covering, landscaping, continuous wetting, detouring, barring access, or other acceptable means;
[A.A.C. R18-2-604.A]
 - (2) Keep dust to a minimum from driveways, parking areas, and vacant lots where motor vehicular activity occurs by using an approved dust suppressant, or adhesive soil stabilizer, or by paving, or by barring access to the property, or by other acceptable means;
[A.A.C. R18-2-604.B]
 - (3) Keep dust and other particulates to a minimum by employing dust suppressants, temporary paving, detouring, wetting down or by other reasonable means when a roadway is repaired, constructed, or reconstructed;
[A.A.C. R18-2-605.A]
 - (4) Take reasonable precautions, such as wetting, applying dust suppressants, or covering the load when transporting material likely to give rise to airborne dust;
[A.A.C. R18-2-605.B]
 - (5) Take reasonable precautions, such as the use of spray bars, wetting agents, dust suppressants, covering the load, and hoods when crushing, handling, or conveying material likely to give rise to airborne dust;
[A.A.C. R18-2-606]
 - (6) Take reasonable precautions such as chemical stabilization, wetting, or covering when organic or inorganic dust producing material is being stacked, piled, or otherwise stored;
[A.A.C. R18-2-607.A]
 - (7) Operate stacking and reclaiming machinery utilized at storage piles at all times with a minimum fall of material, or with the use of spray bars and wetting agents;
[A.A.C. R18-2-607.B]
 - (8) Any other method as proposed by the Permittee and approved by the Director.
[A.A.C. R18-2-306.A.3.c]

2. Air Pollution Control Requirements

Haul Roads and Storage Piles

Water, or an equivalent control, shall be used to control visible emissions from haul roads and storage piles.

[A.A.C. R18-2-306.A.2 and -331.A.3.d]

[Material Permit Condition is indicated by underline and italics]

3. Monitoring and Recordkeeping Requirements

- a. The Permittee shall maintain records of the dates on which any of the activities listed in Conditions VII.B.1.c.(1) through (8) were performed and the control measures that were adopted.

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

b. Opacity Monitoring Requirements

- (1) The Permittee shall conduct a quarterly visual survey of visible emissions from the fugitive dust sources. The Permittee shall keep a record of the name of the observer, the date and location on which the survey was made, and the results of the survey.

- (2) If the observer sees a visible emission from a fugitive dust source that on an instantaneous basis appears to exceed applicable opacity standard, then the observer shall, if practicable, take a six-minute Method 9 observation of the visible emission.

- (a) If the six-minute opacity of the visible emission is less than or equal to applicable opacity standard, the observer shall make a record of the following:

- (i) Location, date, and time of the observation; and
(ii) The results of the Method 9 observation.

- (b) If the six-minute opacity of the visible emission exceeds applicable opacity standard, then the Permittee shall do the following:

- (i) Adjust or repair the controls or equipment to reduce opacity to below the applicable standard; and
(ii) Report it as an excess emission under Section XII.A of Attachment "A".

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

4. Permit Shield

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

Compliance with the conditions of this Section shall be deemed compliance with A.A.C. R18-2-604, -605, -606, -607, -612, -614, and -702.B.3.

VIII. MOBILE SOURCE REQUIREMENTS

A. Applicability

The requirements of this Section are applicable to mobile sources which either move while emitting air contaminants or are frequently moved during the course of their utilization but are not classified as motor vehicles, agricultural vehicles, or agricultural equipment used in normal farm operations. Mobile sources shall not include portable sources as defined in A.A.C. R18-2-101.108.

[A.A.C. R18-2-801.A]

B. Particulate Matter and Opacity

1. Emission Limitations/Standards

a. Off-Road Machinery

The Permittee shall not cause, allow, or permit to be emitted into the atmosphere from any off-road machinery, smoke for any period greater than ten consecutive seconds, the opacity of which exceeds 40 percent. Visible emissions when starting cold equipment shall be exempt from this requirement for the first ten minutes. Off-road machinery shall include trucks, graders, scrapers, rollers, and other construction and mining machinery not normally driven on a completed public roadway.

[A.A.C. R18-2-802]

b. Roadway and Site Cleaning Machinery

(1) The Permittee shall not cause, allow or permit to be emitted into the atmosphere from any roadway and site cleaning machinery smoke or dust for any period greater than ten consecutive seconds, the opacity of which exceeds 40 percent. Visible emissions when starting cold equipment shall be exempt from this requirement for the first ten minutes.

[A.A.C. R18-2-804.A]

(2) The Permittee shall take reasonable precautions, such as the use of dust suppressants, before the cleaning of a site, roadway, or alley. Earth or other material shall be removed from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water or by other means.

[A.A.C. R18-2-804.B]

c. Unless otherwise specified, no mobile source shall emit smoke or dust the opacity of which exceeds 40 percent.

[A.A.C. R18-2-801.B]

2. Recordkeeping Requirement

The Permittee shall keep a record of all emissions related maintenance activities performed on the Permittee's mobile sources stationed at the facility as per manufacturer's specifications.

[A.A.C. R18-2-306.A.5.a]

3. Permit Shield

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

Compliance with this Section shall be deemed compliance with A.A.C. R18-2-801, -802, and -804.

IX. OTHER PERIODIC ACTIVITIES

A. Abrasive Blasting

1. Particulate Matter and Opacity

a. Emission Limitations/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:

- (1) wet blasting;
- (2) effective enclosures with necessary dust collecting equipment; or
- (3) any other method approved by the Director.

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

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, as measured by EPA Reference Method 9.

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

2. Monitoring and Recordkeeping Requirement

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

- a. The date the project was conducted;
- b. The duration of the project; and
- c. Type of control measures employed.

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

3. Permit Shield

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

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

B. Use of Paints

1. Volatile Organic Compounds

a. Emission Limitations/Standards

While performing spray painting operations, the Permittee shall comply with the following requirements:

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

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

- (2) The Permittee or their designated contractor shall not either:

- (a) Employ, apply, evaporate, or dry any architectural coating containing photochemically reactive solvents for industrial or commercial purposes; or
- (b) Thin or dilute any architectural coating with a photochemically reactive solvent.

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

- (3) For the purposes of Condition IX.B.1.a.(2), 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 IX.B.1.a.(3)(a) through (c), or which exceeds any of the following percentage composition limitations, referred to the total volume of solvent:

- (a) 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.
- (b) A combination of aromatic compounds with eight or more carbon atoms to the molecule except ethylbenzene: 8 percent.
- (c) A combination of ethylbenzene, ketones having branched hydrocarbon structures, trichloroethylene or toluene: 20 percent.

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

- (4) 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 IX.B.1.a.(3)(a) through (c), 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]

b. Monitoring and Recordkeeping Requirements

- (1) Each time a spray painting project is conducted, the Permittee shall make a record of the following:

- (a) The date the project was conducted;
- (b) The duration of the project;
- (c) Type of control measures employed;
- (d) Safety Data Sheets for all paints and solvents used in the project; and
- (e) The amount of paint consumed during the project.

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

- (2) Spot painting projects shall be exempt from the recordkeeping requirements of Condition IX.B.1.b.(1) above.

c. Permit Shield

Compliance with this Part shall be deemed compliance with A.A.C.R18-2-727.

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

2. Opacity

a. Emission Limitation/Standard

The Permittee shall not cause, allow or permit visible emissions from painting operations in excess of 20 percent opacity, as measured by EPA Reference Method 9.

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

b. Permit Shield

Compliance with the conditions of this Part shall be deemed compliance with A.A.C.R18-2-702.B.3.

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

C. Demolition/Renovation - Hazardous Air Pollutants

1. Emission Limitation/Standard

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

[A.A.C. R18-2-1101.A.8]

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 Part shall be deemed compliance with A.A.C. R18-2-1101.A.8.

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

DRAFT

ATTACHMENT "C": EQUIPMENT LIST
Air Quality Control Permit No. 63419 for
For
W.L. Gore & Associates, Inc.

EQUIPMENT								APPLICABILITY		MNSR REVIEW
Type	Maximum Capacity	Make	Model	S. No.	ID #	Existing/ New	Year of Manuf.	NSPS	NESHAP	Yes/No
ER Production Lines	NA	NA	NA	NA	ER 100	Existing	NA	No	No	No
ER Emergency Generator	200 HP	Generac	974 03250S	2035431	EREG	Existing	1997	No, NG	Yes	No
ER Boiler 1	1.0 MMBtu/hr	Aerco	KC1000 GWB	G-91-218	ERB1	Existing	1997	No	Yes	No
ER Boiler 2	1.0 MMBtu/hr	Aerco	KC1000 GWB	G-91-217	ERB2	Existing	1991	No	Yes	No
ER Boiler 3	1.0 MMBtu/hr	Aerco	BMK- 1000	G-13-1752	ERB3	Existing	1991	No	Yes	No
ER Boiler 4	1.0 MMBtu/hr	Aerco	BMK- 1000	G-13-1753	ERB4	Existing	1991	No	Yes	No
WS Production Lines	NA	NA	NA	NA	WS 100	Existing	NA	No	No	No
WS Emergency Generator	370 HP	Caterpillar	G275LG2	GXD00213	WSEG	Existing	2009	Yes, Subpart JJJJ	Yes, New	No
WS Boiler 1	1.0 MMBtu/hr	Aerco	KC1000 GWB	G-91-297	WSB1	Existing	1991	No	No	No
WS Boiler 2	1.0 MMBtu/hr	Aerco	KC1000 GWB	G-91-298	WSB2	Existing	1991	No	No	No
WS Boiler 3	1.0 MMBtu/hr	Aerco	KC1000 GWB	G-03-0600	WSB3	Existing	2003	No	No	No

EQUIPMENT								APPLICABILITY		MNSR REVIEW
Type	Maximum Capacity	Make	Model	S. No.	ID #	Existing/ New	Year of Manuf.	NSPS	NESHAP	Yes/No
WS Boiler 4	1.0 MMBtu/hr	Aerco	KC1000 GWB	G-04-0591	WSB4	Existing	2004	No	No	No
WS Shop Heater	0.105 MMBtu/hr	Reznor	UDAP100	BEL79Y2N5 4092X	WSH1	Existing	2005	No	No	No
CT R&D Oven 1	0.06 GPH	Despatch	NA	2466	CTOven1	Existing	2012	No	No	No
CT R&D Extruder 1448	15.53 TPY VOC	Gore	NA	1448	CTE1448	Existing	1995	No	No	No
CT R&D Extruder 90290	0.915 TPY VOC	Gore	NA	90290	CTE9029 0	Existing	2012	No	No	No
CT TM Drying Oven 7146	5.48 TPY VOC	TM	NA	7146	CTE7146	Existing	1993	No	No	No
CT Extruder 7664	15.53 TPY VOC	Gore	NA	7664	CTE7664	Existing	2010	No	No	No
CT Extruder CPE2	15.53 TPY VOC	Gore	NA	CPE2	CTCPE2	New	20150	No	No	No
CT Extruder 90150	1.83 TPY VOC	Gore	NA	90150	CTE9015 0	Existing	2010	No	No	No
EH Production Lines	NA	NA	NA	NA	EH 100	Existing	NA	No	No	No
EH Emergency Generator	180 HP	Caterpillar	G366 TA	07Y06465	EHEG	Existing	1999	No, NG	Yes, Exising	No
Electropolishing Line 1	NA	NA	NA	EP1	NA	Existing	NA	No	No	No
Electropolishing Line 2	NA	NA	NA	EP2	NA	Existing	NA	No	No	No
EH Boiler 1	1.0 MMBtu/hr	Aerco	KC1000 GWB	G-98-091	EHB1	Existing	1998	No	No	No

EQUIPMENT								APPLICABILITY		MNSR REVIEW
Type	Maximum Capacity	Make	Model	S. No.	ID #	Existing/ New	Year of Manuf.	NSPS	NESHAP	Yes/No
EH Boiler 2	1.0 MMBtu/hr	Aerco	KC1000 GWB	G-98-094	EHB2	Existing	1998	No	No	No
EH Boiler 3	1.0 MMBtu/hr	Aerco	KC1000 GWB	G-98-093	EHB3	Existing	1998	No	No	No
EH Boiler 4	1.0 MMBtu/hr	Aerco	KC1000 GWB	G-98-090	EHB4	Existing	1998	No	No	No
EH Boiler 5	1.0 MMBtu/hr	Aerco	KC1000 GWB	G-98-092	EHB5	Existing	1998	No	No	No
WM Production Lines	NA	NA	NA	NA	WM 100	Existing	NA	No	No	No
WM Emergency Generator	200 HP	Caterpillar	G250G1	OLY00000H NGJ00561	WMEG	Existing	Sept., 2008	No, NG	Yes, Existing	No
WM Boiler 1	2.0 MMBtu/hr	Aerco	Benchmark 2.0	G-05-1025	WMB1	Existing	2005	No	No	No
WM Boiler 2	2.0 MMBtu/hr	Aerco	Benchmark 2.0	G-05-1026	WMB2	Existing	2005	No	No	No
WM Water Heater	0.2 MMBtu/hr	Ruud	G-75-75N-2	RRLN06091 01790	WMWH1	Existing	2009	No	No	No
WM Water Heater	0.2 MMBtu/hr	Ruud	G-100-200	URNG0712 G00549	WMWH1	Existing	2012	No	No	No
CT Fibers Oven 3020	13 Gal. Solvent/ yr	Gore	NA	3020	CTOven 3020	Existing	1992	No	No	No
CT Extruder 5936	9.75 gal/ yr	Gore	NA	5936	CTE5936	Existing	1992	No	No	No
Pyrolysis Oven 51867	0.3 MMBtu/hr	PCP, Inc.	SP-13	51867	Oven5186 7	Existing	1998	No	No	No
Solvent Oven 9524	1.5 lbs/hr	Grieve	HA-650	470073	Oven9524	Existing	1986	No	No	No

EQUIPMENT								APPLICABILITY		MNSR REVIEW
Type	Maximum Capacity	Make	Model	S. No.	ID #	Existing/ New	Year of Manuf.	NSPS	NESHAP	Yes/No
Co-Fired Incinerator	550 lbs/day	Crawford	C-1000P	1CP9005-0191ULXP	SC101	Existing	1991	No	No	No
SC Emergency Generator	535 HP	Kohler	400ROZD71	274198	SC102	Existing	1990	No	Yes, Existing	No
SC Boiler	2.4 MMBtu/hr	Bryan	RV300S150	68885	SC13	Existing	1990	No	No	No
SC Hotwater Heater 1	1.0 MMBtu/hr	Aerco	KC1000 GWB	G-89-11-133	SCHWH1	Existing	1989	No	No	No
SC Hotwater Heater 2	1.0 MMBtu/hr	Aerco	KC1000 GWB	G-89-11-128	SCHWH2	Existing	1989	No	No	No
SC Hotwater Heater 3	1.0 MMBtu/hr	Aerco	KC1000 GWB	G-89-11-131	SCHWH3	Existing	1989	No	No	No
SC Hotwater Heater 4	1.0 MMBtu/hr	Aerco	KC1000 GWB	G-89-11-129	SCHWH4	Existing	1989	No	No	No
SC Hotwater Heater 5	1.0 MMBtu/hr	Aerco	KC1000 GWB	G-94-0138	SCHWH5	Existing	1994	No	No	No
SC Hotwater Heater 6	1.0 MMBtu/hr	Aerco	KC1000 GWB	G-98-048	SCHWH6	Existing	1998	No	No	No
SC Hotwater Heater 7	1.0 MMBtu/hr	Aerco	KC1000 GWB	G-98-055	SCHWH7	Existing	1998	No	No	No
SC Hotwater Heater 8	1.0 MMBtu/hr	Aerco	KC1000 GWB	G-98-181	SCHWH8	Existing	1998	No	No	No
SC Hotwater Heater 9	1.0 MMBtu/hr	Aerco	KC1000 GWB	G-90-1-021	SCHWH9	Existing	1990	No	No	No
SC Hotwater Heater 10	1.0 MMBtu/hr	Aerco	KC1000 GWB	G-90-1-022	SCHWH10	Existing	1990	No	No	No
SC Shop Heater 1	0.075 MMBtu/hr	Renzor	UDAP75	BNC796EN3 695X	SCSH1	Existing	2014	No	No	No

EQUIPMENT								APPLICABILITY		MNSR REVIEW
Type	Maximum Capacity	Make	Model	S. No.	ID #	Existing/ New	Year of Manuf.	NSPS	NESHAP	Yes/No
SC Shop Heater 2	0.040 MMBtu/hr	Robert Gordon Inc.	Vantage II-CTH2-40	9011-013-040-0060	SCSH2	Existing	1990	No	No	No
KP Production & Coating Lines	NA	NA	NA	NA	KP100	Existing	NA	No	No	No
KP Emergency Generator	495 HP	Cummins	325GFEA/GTA19GG1	25312996	KPEG	Existing	Aug, 2006	No, NG	Yes, Existing	No
KP Boiler 1	2.0 MMBtu/hr	Aerco	BMK-2.0	G-06-1368	KPB1	Existing	2006	No	No	No
KP Boiler 2	2.0 MMBtu/hr	Aerco	BMK-2.0	G-06-1367	KPB2	Existing	2006	No	No	No
KP Boiler 3	2.0 MMBtu/hr	Aerco	BMK-2.0	G-06-1366	KPB3	Existing	2006	No	No	No
KP Boiler 4	2.0 MMBtu/hr	Aerco	BMK-2.0	G-06-1346	KPB4	Existing	2006	No	No	No
KP Humidifier 1	0.8 MMBtu/hr	Dristeem	GTS04-800DI2	1145701-04-01	KPH1	Existing	2006	No	No	No
KP Humidifier 1	0.8 MMBtu/hr	Dristeem	GTS04-800DI2	1145701-04-02	KPH2	Existing	2006	No	No	No
KP Gas Oven	0.315 MMBtu/hr	Despatch	TFD3-21-1G	175695	KPBGO7 839	Existing	2007	No	No	No
KP Hot Water Heater 1	0.2 MMBtu/hr	RHEEM	HE119-199N	0914T0877N	KPHWH1	Existing	2006	No	No	No
KP Hot Water Heater 2	0.2 MMBtu/hr	RHEEM	HE119-199N	0813T0560N	KPHWH2	Existing	2006	No	No	No
KP Hot Water Heater 3	0.2 MMBtu/hr	RHEEM	HE119-199N	0813T0575N	KPHWH3	Existing	2006	No	No	No

EQUIPMENT								APPLICABILITY		MNSR REVIEW
Type	Maximum Capacity	Make	Model	S. No.	ID #	Existing/ New	Year of Manuf.	NSPS	NESHAP	Yes/No
KP Hot Water Heater 4	0.2 MMBtu/hr	RHEEM	HE119-199N	0706T0241N	KPHWH4	Existing	2006	No	No	No
KP Oven 9490	0.4 oz @125° C	Blue M	TFD3-21-1G	175965	Oven 9490	Existing	2009	No	No	No
KP Oven 9076	21 oz @100° C	Blue M	DC-246A-GHP	DC-7874	Oven 9076	Existing	2009	No	No	No
KP – CR7 Abrasive Blaster	40 lbs	Maxi-Blast	MBT 4836 SLPC- DP850	87801	KP AB1	Existing	2002	No	No	No
FP Emergency Generator	566 HP	Caterpillar	G3412	CTP02525	FPEG	Existing	May, 2006	No	Yes, Existing	No
FP Process Steam Boiler	2.0 MMBtu/hr	Fulton	VMP 100	10839	FPB1	Existing	2009	No	No	No
FP Process Steam Boiler	2.0 MMBtu/hr	Fulton	VMP 100	10839	FPB2	Existing	2009	No	No	No
FP Facility Heat Boiler	2.0 MMBtu/hr	Aerco	BMK-2.0	G-08-2190	FPB3	Existing	2009	No	No	No
FP Facility Heat Boiler	2.0 MMBtu/hr	Aerco	BMK-2.0	G-08-2189	FPB4	Existing	2009	No	No	No
FP Building Heat Boiler 1	2.0 MMBtu/hr	Aerco	BMK-2.0	G-13-0303	FPB5	Existing	2013	No	No	No
FP Building Heat Boiler 1	2.0 MMBtu/hr	Aerco	BMK-2.0	G-13-0305	FPB6	Existing	2013	No	No	No
FP Ethylene Sterilizer Chamber (SC)(Production)	441 Cubic Feet	ST1	Custom Built	12	FP Sterile2	Existing	2009	No	Yes, Subpart O	No

EQUIPMENT								APPLICABILITY		MNSR REVIEW
Type	Maximum Capacity	Make	Model	S. No.	ID #	Existing/ New	Year of Manuf.	NSPS	NESHAP	Yes/No
FP Ethylene Sterilizer Chamber (Production)	441 Cubic Feet	ST1	Custom Built	11	FP Sterile3	Existing	2009	No	Yes, Subpart O	No
FP Ethylene Sterilizer Chamber (Prod.)	32.5 Cubic Feet	ST1	Custom Built	15	FP Sterile1	Existing	2009	No	Yes, Subpart O	No
FP Product Aeration Room	(1) 8 Pallet	Lunch Material Handling Co.	Custom Built	20003068 (Asset #)	FPAERT A1	Existing	2009	No	Yes, Subpart O	No
FP Product Aeration Room	(1) 8 Pallet	Lunch Material Handling Co.	Custom Built	20003068 (Asset #)	FPAERT A2	Existing	2009	No	Yes, Subpart O	No
FP Acid Water Scrubber	1,500 Gallon Reactor	Damas Corp.	Tri-Phase EO Scrubber	20003070 (Asset #)	FPAWSC R1	Existing	2009	No	Yes, Subpart O	No
FP Dry Bed reactor	2,000 acfm	AAT Safe Cell II	DR-490	61316	FPDBED1	Existing	2009	No	Yes, Subpart O	No