



# Maricopa County

Air Quality Department

AIR QUALITY DEPARTMENT  
1001 North Central Avenue  
Phoenix, AZ 85004

GF INVESTORS  
ATTN: JUAN ANOTA  
390 E. RAY ROAD  
CHANDLER, AZ 85225

The purpose of the letter is to inform you that the application for a permit renewal has been approved and will be incorporated into Air Quality Permit 060102. The applicable Permit Conditions are enclosed with this letter.

If you need assistance with the permit, please contact the Small Business Assistance Coordinator office at 602.506.5102 or contact the undersigned at 602.506.7248. Email communications may be sent to [AQPermits@mail.maricopa.gov](mailto:AQPermits@mail.maricopa.gov).

MARICOPA COUNTY AIR QUALITY DEPARTMENT

Engineering and Permitting Division

1001 N. Central Avenue, Suite 400, Phoenix, Arizona 85004

Phone: (602) 506-6010

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**AIR QUALITY PERMIT TO OPERATE AND/OR CONSTRUCT**

*(As required by Title 49, Chapter 3, Article 2, Section 49-480, Arizona Revised Statutes)*

**ISSUED TO**

**Southwest Fibers, LLC**

**390 E. Ray Road**

**Chandler, AZ 85225**

*This air quality permit to operate and/or construct does not relieve the applicant of the responsibility of meeting all air pollution regulations.*

THE PERMITTEE IS SUBJECT TO THE SPECIFIC AND GENERAL CONDITIONS IDENTIFIED IN THIS PERMIT.

**PERMIT NUMBER:** 060102

**REVISION DATE:** xx/xx/xxxx

**REVISION NUMBER:** 2.0.0.0

**EXPIRATION DATE:** 12/31/2021

**Todd Martin, Non-Title V Permit Supervisor**

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Any cited regulatory paragraphs or section numbers refer to the version of the rules and regulations that were in effect on the first date of public notice of the applicable Permit Condition unless specified otherwise. However, in the event the rules and regulations are amended during the term of this Permit, the amended rules and regulations shall apply to this Permit. Whenever the term, Control Officer, is used in this Permit it shall be interpreted to mean, Control Officer or designated representative. Where the term "Rule" appears, it shall be construed to mean "Maricopa County Air Pollution Control Regulations" unless otherwise noted.

## **SPECIFIC CONDITIONS**

### **1. Allowable Production Rate:**

The Permittee shall limit the production of cellulose insulation to no more than 80,000 tons per year.

[Rule 220 §302.2]

### **2. Opacity**

No person shall discharge into the ambient air from any single source of emissions any air contaminant, other than uncombined water, in excess of 20% opacity for a period aggregating more than three minutes in any 60-minute period.

- a. If any non-compliant visible emissions (excluding water vapor) are detected or reported, the Permittee shall determine the cause and/or the source of emissions. The Permittee shall then take immediate corrective action(s) and if necessary, shut down the applicable equipment. If visible emissions (excluding water vapor) exceed the above opacity standards subsequent to implementing corrective action(s), the Permittee shall shut down the applicable equipment and institute repairs or changes necessary to ensure compliance prior to resuming operations.
- b. Opacity shall be determined by observations of visible emissions conducted in accordance with EPA Reference Method 9 as modified by EPA Reference Method 203B.

[Rule 300 §§301, 501]

### **3. Control Parameters**

- a. The Permittee shall not engage in material handling operations, including but not limited to, loading, unloading, conveying and reclaiming, without first implementing reasonably available control measures to effectively prevent or minimize dust.
- b. The Permittee shall not operate the following equipment unless the exhaust is vented through a properly functioning dust collector/baghouse, which provides a minimum removal efficiency of 99% for particulate matter of 10 microns or less. The efficiency of the dust collectors/baghouses shall be verified by records of manufacturer's recommended maintenance procedures and through an Operations & Maintenance Plan approved by the Control Officer:
  - i. Primary mill
  - ii. Secondary mill
  - iii. Finish mill/fiberizer
  - iv. Packaging feed hopper
- c. The baghouses shall be operated and maintained in accordance with the approved Operations & Maintenance Plan.

[Rule 311 §§304, 305]

### **4. Operation and Maintenance (O&M) Plan Requirements:**

- a. Unless an O&M Plan has previously been submitted and approved, the Permittee shall submit an approvable O&M Plan for each emission control system (ECS) to the Control Officer, Attn: Compliance Division Manager, within 45 days of the initial issuance of this permit, or within 45 days of the equipment receiving exhaust, in accordance with the Department guidelines. The Permittee shall revise the O&M Plan upon the request of the Control Officer and whenever substantive changes are made to the equipment or plan, in accordance with the Department guidelines.

- b. The O&M Plan shall specify key system operating parameters, such as temperatures, pressures and/or flow rates, necessary to determine compliance and describe in detail procedures to maintain the approved emission control system. The Permittee shall monitor, operate and maintain the equipment in accordance with the device's approved O&M Plan. Any O&M Plan for a baghouse must include monitoring for pressure drop and visible emissions.
- c. Changes to an existing O&M Plan shall be made by submitting a complete, revised O&M Plan along with a cover letter identifying all changes and the reason for such changes. The Permittee may implement the changes addressed in the revised O&M plan after it submits the revision to the Control Officer. Unless disapproved in writing by the Control Officer, the Permittee shall continue to operate in accordance with the revised O&M plan.
- d. If any control device is found to be operating outside a specified range, the Permittee shall immediately take corrective action to bring the device back into the specified operating range or shut down the device and the associated equipment vented to it.
- e. If a pattern of excursions, as determined by the Control Officer or the Permittee, of operation outside the specified operating range develops, the Permittee shall submit for Department approval a Corrective Action Plan to bring the devices back into the specified operating range. The Plan shall be submitted to the Control Officer, Attn: Compliance Division Manager, within 30 days of the determination of the existence of excursions.

[Rule 220 §302.4; Rule 311§305]

## 5. Record Keeping:

The Permittee shall keep the following records on site and available upon request. The records shall be retained for 5 years from the date of such record.

- a. A daily record of the weight of all process material entering into each process including raw materials, additives, fuels, the start time and the duration of each process run. In addition to the foregoing, records shall be kept for processes which run continuously for more than 24 hours. Such records shall include the total weight of any material entering into the process over the entire duration of the process run from start up to shut down and the total elapsed time of operation.

[Rule 311 §§502, 503]

### b. O&M Plan:

#### i. Monitoring and maintenance records specified in the O&M Plan:

- 1) Monitoring Records shall consist of an operations log sheet to be completed for every day the process and/or control device is in operation. Operations log sheets shall, at a minimum, contain the following information: equipment identification; date and time of readings; identification of the individual recording the data; operating parameters to be monitored including units of measure, operating limits (upper and lower limits), and locations for recording measurements; measurement frequency; and if applicable, corrective action taken. Account for any periods of operation when the control device was not operating.
- 2) Maintenance Records shall, at a minimum, contain the following information: equipment identification; date; identification of the individual performing the maintenance check; procedures to be performed including frequency of occurrence; results of inspection (acceptable, nozzle plugged, belt cracked, etc.); and corrective action taken (none, cleaned nozzle, replaced belt, etc.).

ii. Whenever the O&M Plan requires that maintenance be performed, a record shall be made of the maintenance actions taken within 24 hours of maintenance completion.

iii. An explanation shall be recorded for any scheduled maintenance that is not performed during the period designated in the O&M Plan.

[Rule 220 §302.7; Rule 311 §305]

- c. Monthly and twelve month rolling total production of cellulose insulation. Records shall be updated by the 30<sup>th</sup> day following the end of each calendar month.

[Rule 220 §302.7]

## **GENERAL CONDITIONS**

### **6. Posting of Permit:**

This Permit shall be posted in a clearly visible and accessible location on the site where the equipment is installed.

[Rule 200 §312]

### **7. Compliance:**

- a. The issuance of any Permit or Permit revision shall not relieve the Permittee from compliance with any Federal laws, Arizona laws, or the County or SIP Rules, nor does any other law, regulation or permit relieve the Permittee from obtaining a Permit or Permit revision required under the County Rules.

[Rule 200 §309][Rule 220 §406.3][Locally Enforceable Only]

- b. The Permittee shall comply with all conditions of this Permit including all applicable requirements of Federal laws, Arizona laws, and Maricopa County Air Pollution Control Rules and Regulations now in effect and as amended in the future. Any Permit noncompliance is grounds for enforcement action, Permit termination or revocation, or for denial of a renewal application. In addition, non-compliance with any federally enforceable requirements constitutes a violation of the Clean Air Act.

[Rule 200 §310.4][Rule 220 §302.24] [A.A.C. R18-2-306.A.8.a][Locally Enforceable Only]

- c. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with these Permit Conditions.

[Rule 220 §302.10][A.A.C. R18-2-306.A.8.b][Locally Enforceable Only]

- d. Rights and Privileges: This Permit does not convey any property rights or exclusive privilege of any sort.

[Rule 220 §302.12][Locally Enforceable Only]

- e. Fees: The Permittee shall pay all fees to the Control Officer in accordance with Rule 280. No permit or permit revision is valid until the applicable permit fee has been received and until the permit is issued by the Control Officer.

[Rule 200 §409][Rule 280 §302][A.R.S. 49-480(D)][SIP Rule 28]

### **8. Malfunctions, Emergency Upsets, and Excess Emissions:**

An affirmative defense of an emergency, excess emission, and/or during startup and shutdown shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence as outlined in Rule 130 for emergencies and Rule 140 for excess emissions.

[Rule 130 §§201, 400][Rule 140 §§400, 500][SIP Rule 140]

### **9. Revision / Reopening / Revocation:**

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, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any Permit Condition.

[Rule 220 §302.11][Locally Enforceable Only]

### **10. Records:**

- a. The Permittee shall furnish information that the Control Officer may request in writing to determine whether cause exists for revising, revoking and reissuing this permit, or terminating this permit, or to determine compliance with this permit. The information shall be provided in a timeframe specified by the Control Officer. Upon request, the Permittee shall also furnish to the Control Officer copies of records required to be kept by this Permit. For information claimed to be confidential, the Permittee shall furnish a copy of such records directly to the Administrator along with a claim of confidentiality.

[Rule 220 §302.13][SIP Rule 40]

- b. If the Permittee fails to submit any relevant facts or has submitted incorrect information in a permit application, the Permittee shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. In addition, the Permittee shall provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application is filed but prior to release of a proposed permit. Willful misrepresentation of facts in a permit application is cause for revocation or denial of a permit.

[Rule 220 §§301.5, 301.6][Locally Enforceable Only]

#### 11. Right to Entry:

- a. The Control Officer during reasonable hours, for the purpose of enforcing and administering County or SIP Rules or the Clean Air Act, or any provision of the Arizona Revised Statutes relating to the emission or control prescribed pursuant thereto, may enter every building, premises, or other place, except the interior of structures used as private residences. Every person is guilty of a petty offense under A.R.S. 49-488 who in any way denies, obstructs or hampers such entrance or inspection that is lawfully authorized by warrant.
- b. The Permittee shall allow the Control Officer or his designated representatives, upon presentation of proper credentials (e.g., Maricopa County Air Quality Department identification) and other documents as may be required by law, to:
- i. Enter upon the Permittee's premises where a source is located or emissions-related activity is conducted, or where records are required to be kept pursuant to the conditions of the permit;
  - ii. Have access to and copy, at reasonable times, any records that are required to be kept pursuant to the conditions of the permit;
  - iii. Inspect, at reasonable times, any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required pursuant to this permit;
  - iv. Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the Permit or other applicable requirements; and
  - v. To record any inspection by use of written, electronic, magnetic, and photographic media.

[Rule 100 §105][Rule 220 §302.17-21][SIP Rule 43]

#### 12. Severability:

The rules, paragraphs, clauses, provisions, and/or sections of this Permit are severable, and, if any rule, paragraph, clause, provision, and/or section of this Permit is held invalid, the remainder of this Permit shall not be affected thereby.

[Rule 220 §302.9][SIP Rule 80]

## Equipment List

SOUTHWEST FIBERS LLC

Permit Number 060102

Date Issued: 12/26/06

Revision: 2.0.0.0

<b>Equipment Description</b>	<b>Rated Capacity</b>	<b>Quantity Exist/Future</b>
<b>INSULATION MANUFACTURING EQUIPMENT:</b>		
1. FEEDER - PAPER	5.00 HP	2 /
2. EQUIPMENT - PAPER FLUFFER	10.00 HP	2 /
3. CONVEYOR - INCLINE	2.00 HP	2 /
4. EQUIPMENT - MAGNET, CROSS-BELT	5.00 HP	2 /
5. MILL - PRIMARY SHREDDER VENTING TO BAGHOUSE #1	250.00 HP	2 /
6. MILL - SECONDARY SHREDDER VENTING TO BAGHOUSE #1	300.00 HP	2 /
7. SEPARATOR - WASTE	4.00 HP	2 /
8. FAN - MATERIAL	60.00 HP	2 /
9. HOPPER - PRIMARY METERING	15.00 HP	2 /
10. CONVEYOR - WEIGH BELT	3.00 HP	2 /
11. MILL - FINISH/FIBERIZER VENTING TO BAGHOUSE #2	500.00 HP	2 /
12. FAN - MATERIAL	75.00 HP	2 /
13. EQUIPMENT - CHEMICAL PULVERIZER	125.00 HP	4 /
14. HOPPER - PACKAGING VENTING TO BAGHOUSE #2	15.00 HP	2 /
15. EQUIPMENT - PACKAGING	100.00 HP	4 /
16. CONVEYOR - LOADING	5.00 HP	4 /
<b>CONTROL EQUIPMENT:</b>		
1. BAGHOUSE - SLY INC., STJ	15,000.00 CFM	2 /
2. BAGHOUSE - DCE DALAMATIC, INSTALLED 2014	15,000.00 CFM	2 /
<b>De Minimis Equipment:</b>		
1. TANK, ABOVEGROUND STORAGE - DIESEL	1,000.00 GALLON(S)	1 /