

PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY

33 North Stone Avenue, Suite 700 • Tucson, AZ 85701 • Phone: (520) 724-7400

AIR QUALITY OPERATING PERMIT

(As required by Title 17.12, Article II, Pima County Code)

ISSUED TO

HONEYWELL INTERNATIONAL, INC.

**11100 NORTH ORACLE ROAD
TUCSON, ARIZONA 85737**

This air quality operating permit does not relieve applicant of responsibility for meeting all air pollution regulations

THIS PERMIT ISSUED SUBJECT TO THE SPECIFIC CONDITIONS AND ATTACHMENTS IDENTIFIED IN THIS PERMIT.

PERMIT NUMBER **1480**

PERMIT CLASS **II**

ISSUED: **MARCH 13, 2013**

EXPIRES: **MARCH 12, 2018**

REVISED: **AUGUST 16, 2013**



SIGNATURE

Mukonde Chama, P.E., Air Permits Manager, PDEQ

TITLE

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PERMIT SUMMARY

The Honeywell Aerospace (Honeywell) facility is located at 11100 North Oracle Road, Tucson Arizona. The Honeywell facility manufactures and tests a variety of parts and equipment related to the aerospace industry and is subject to air permitting for emissions of regulated air pollutants.

Potential emissions resulting from the facility operations include NO_x, VOC, HAPs, PM₁₀, SO_x and CO.

The regulated emission sources at the facility include:

- An emergency generator
- A fire pump engine
- two natural fired gas boilers, and
- several spray booths

The emergency generator is used for backup electrical power in the case of an emergency or power outage. The fire pump engine is used for the site's fire suppression systems. The emergency generator and the fire pump engine are limited by federal regulation to operate no more than 50 hrs/yr for non-emergency operation(s) in any 12 month period. The boilers are used to supply steam and heat hot water. Several spray booths are used for paint mixing, paint/coating spraying, spot painting and touch-up operations.

The source thus remains as a **True Minor source for all regulated air pollutants.**

The potential to emit without controls from all Honeywell facility operations is given in the table below. These numbers are for reference purposes only and are not intended for direct enforcement unless specified in the conditions of this permit as an enforceable emissions limitation by rule or as a voluntary accepted condition(s) by the Permittee.

The combustion emissions of regulated pollutants from the facility equipment were calculated using EPA AP-42 emission factors.

Pollutant	Potential Emissions (Tons per Year)
Nitrogen Oxides (NO _x)	7.36
Carbon Monoxide (CO)	4.39
Volatile Organic Compounds (VOC)	7.83
Particulate Matter (as PM ₁₀)	4.67
Sulfur Oxides (SO _x)	0.22
Hazardous Air Pollutants (HAPs – total)	5.47

EMISSION SOURCES

The affected emission sources at the facility are grouped into the following emission limiting Sections:

- Section A** National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63 Subpart ZZZZ).
- Section B** New and Existing Stationary Source Performance Standards for Fossil-Fuel Fired Industrial and Commercial Equipment
- Section C** New and Existing Stationary Source Performance Standards for Surface Coating and Solvent Handling Activities
- Section D** General Facility-Wide Specific Conditions.



SECTION A

**NATIONAL EMISSIONS STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR
STATIONARY RECIPROCATING INTERNAL COMBUSTION ENGINES**

I. Applicability

- A. The provisions of this category apply to stationary reciprocating internal combustion engines (RICE) at an area source of HAP emissions. [40 CFR 63.6585(c)]
- B. For stationary RICE located at an area source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006. [40 CFR 63.6590(a)(1)(iii)]
- C. The Permittee must comply with the applicable emission limitations and operating limitations identified in this Section no later than May 3, 2013. [40 CFR 63.6595(a)(1)]
- D. The Permittee must comply with the requirements in Table 2d and the operating limitations in Table 1b and Table 2b of Subpart ZZZZ for the existing stationary RICE located at an area source of HAP emissions. [40 CFR 63.6603(a)]

II. Emission Limitations and Standards

- A. The Permittee must comply with the following requirements, except during periods of startup: [40 CFR 63.6603 and Table 2d to Subpart ZZZZ of Part 63]
1. Change oil and filter every 500 hours of operation or annually, whichever comes first; [4.a of Table 2d to Subpart ZZZZ of Part 63]
 2. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; [4.b of Table 2d to Subpart ZZZZ of Part 63]
 3. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. [4.c of Table 2d to Subpart ZZZZ of Part 63]
- B. The Permittee has the option of utilizing an oil analysis program as described in IV.D of this Section in order to extend the specified oil change requirement in II.A.1 of this Section. [Footnote 1, Table 2d to Subpart ZZZZ of Part 63 and 40 CFR 63.6625(i)]
- C. If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in II.A.1 of this Section, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable. [Footnote 2, Table 2d to Subpart ZZZZ of Part 63]

- D. The Permittee shall not cause, allow, or permit to be emitted into the atmosphere from any stationary rotating machinery, smoke for any period greater than ten consecutive seconds that exceeds 40 percent opacity. Visible emissions when starting cold equipment shall be exempt from this requirement for the first ten minutes. [PCC 17.16.340.E]

[Locally Enforceable Condition]

- E. The Permittee shall not cause or permit the effluent from any stationary rotating machinery to have an average optical density equal to or greater than 60 percent when a cold diesel engine is started or when a diesel engine is accelerated under load as measured in accordance with EPA Reference Method 9. [PCC 17.16.040]

[Locally Enforceable Condition]

- F. The Permittee shall burn only the specified fuel allowed for each stationary rotating machinery listed in this Section. The Permittee shall only fire fuel with sulfur content less than 0.90 percent by weight. [PCC 17.12.190.B]

[Locally Enforceable and Material Permit Condition]

III. General Compliance Requirements

- A. The Permittee must be in compliance with the emission limitations and operating limitations in this Section at all times. [40 CFR 63.6605(a)]

- B. The Permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, at all times, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the Permittee to make any further efforts to reduce emissions if levels required by this Section have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Control Officer which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR 63.6605(b)]

IV. Monitoring, Installation, Collection, Operation, and Maintenance Requirements

- A. The Permittee must operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions [40 CFR 63.6625(e) and 40 CFR 63.6625(e)(2)]

- B. The Permittee must install a non-resettable hour meter if one is not already installed. [40 CFR 63.6625(f)]

- C. The Permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in II.A.4 of this Section. [40 CFR 63.6625(h)]

D. If the Permittee decides to utilize an oil analysis program in order to extend the specified oil change requirement in II.A.1 of this Section, the oil analysis must be performed at the same frequency specified for changing the oil in II.A.1 of this Section. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the Permittee is not required to change the oil. If any of the limits are exceeded, the Permittee must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the Permittee must change the oil within 2 days or before commencing operation, whichever is later. The Permittee must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

[40 CFR 63.6625(i) and Table 2d to Subpart ZZZZ of Part 63]

E. In order to demonstrate compliance with the opacity limitation in II.E of this Section, the Permittee shall conduct a visible emissions check on the exhaust stack of the stationary rotating machinery at least quarterly while the stationary rotating machinery is operating. For the purposes of this permit, a visible emissions check is verification that abnormal emissions are not present at the stationary rotating machinery stack.

[PCC 17.12.185.A.3.c]

[Locally Enforceable Condition]

F. If the observer sees visible emissions from the stationary rotating machinery that, on an instantaneous basis, appears to exceed 40 percent then the Permittee shall, if practicable, take a six-minute Method 9 observation of the plume. If the emissions are more than the referenced limitation and standard in II.D or II.E of this Section, then this occurrence shall be recorded and reported as an excess emission and a permit deviation.

[PCC 17.12.185.A.3.c]

[Locally Enforceable Condition]

G. When requested by the Control Officer, the Permittee shall perform visible emissions observations in accordance with EPA Reference Method 9, on the stationary rotating machinery(s) to demonstrate compliance with the opacity standard in I.B.1 of this Section.

[PCC 17.16.040]

[Locally Enforceable Condition]

H. The Permittee shall be considered in compliance with the fuel limitation required in II.G of this Section by demonstrating that only the specified fuel allowed was fired in the subject stationary RICE. Such a demonstration may be made by making available to the Control Officer for his inspection, documentation, such as invoices or statements from the fuel supplier which verify the sulfur content of the fuel being piped and/or delivered.

[PCC 17.12.185.A.3.c]

[Locally Enforceable Condition]

V. Demonstration of Continuous Compliance with the Emission Limitations and Operating Limitations

A. The Permittee must demonstrate continuous compliance with each emission and operating limitation and work or management practice as required in II of this Section according to the following specified method:

[40 CFR 63.6640(a) and Table 6 to Subpart ZZZZ of Part 63]

1. Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or

[Row 9 of Table 6 to Subpart ZZZZ of Part 63]

2. Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [Row 9 of Table 6 to Subpart ZZZZ of Part 63]

B. The Permittee must operate the emergency stationary RICE according to the requirements in paragraphs V.B.1 through V.B.3 of this Section. Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in paragraphs V.B.1 through V.B.3 of this Section, is prohibited. If the Permittee does not operate the engine according to the requirements in paragraphs V.B.1 through V.B.3 of this Section, the engine will not be considered an emergency engine under this Section and will need to meet all requirements for non-emergency engines. [40 CFR 63.6640(f)]

1. There is no time limit on the use of emergency stationary RICE in emergency situations. [40 CFR 63.6640(f)(i)]
2. The Permittee may operate the subject emergency stationary 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. Maintenance checks and readiness testing of such units is limited to 100 hours per year. The Permittee may petition the Control Officer for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year. [40 CFR 63.6640(f)(ii)]
3. The Permittee may operate the subject emergency stationary RICE 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; except that the Permittee may operate the emergency engine for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by this paragraph V.B.3 of this Section, as long as the power provided by the financial arrangement is limited to emergency power. [40 CFR 63.6640(f)(iii)]

VI. Reporting Requirements

[PCC 17.12.185.A.5]

The Permittee shall report to the Control Officer any daily period during which the sulfur content of the fuel being fired in the diesel fired engines exceeds 0.8 percent.

[PCC 17.16.340.J]

[Locally Enforceable Condition]

VII. Recordkeeping Requirements

[PCC 17.12.185.A.4]

- A. The Permittee must keep the records described in paragraphs VII.A.1 through A.3 of this Section. [40 CFR 63.6655(a)]
1. Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. [40 CFR 63.6655(a)(2)]
 2. Records of all required maintenance performed on the air pollution control and monitoring equipment. [40 CFR 63.6655(a)(4)]
 3. Records of actions taken during periods of malfunction to minimize emissions in accordance with III.B of this Section, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [40 CFR 63.6655(a)(5) and 40 CFR 63.6605(b)]
- B. The Permittee must keep the records required in IV.A and IV.B of this Section to show continuous compliance with each applicable emission or operating limitation. [40 CFR 63.6655(d)]
- C. The Permittee must keep records of the maintenance conducted on the existing stationary emergency RICE in order to demonstrate that the Permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to the Permittees own maintenance plan. [40 CFR 63.6655(e) and 40 CFR 63.6655(e)(3)]
- D. The Permittee must keep records of the hours of operation of the subject RICE that does not meet the standards applicable to non-emergency engine that is recorded through the non-resettable hour meter. The Permittee must document how many hours are spent for emergency operation; including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the subject engine is used for demand response operation, the Permittee must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response. [40 CFR 63.6655(g) and 40 CFR 63.6655(f)(2)]
- E. The Permittees records must be in a form suitable and readily available for expeditious review according to 40 CFR 63.10(b)(1). [40 CFR 63.6660(a)]
- F. As specified in 40 CFR 63.10(b)(1), the Permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [40 CFR 63.6660(b)]
- G. The Permittee must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). [40 CFR 63.6660(c)]
- H. The Permittee shall retain records of visible emissions checks/observations. The Permittee shall record the date and time of the check, the name of the person conducting the check, the results of the check, and the type of corrective action taken (if required). All records shall be maintained for five years.
[Locally Enforceable Condition]
- I. In order to demonstrate compliance with the fuel limitation required in II.C of this Section, the Permittee shall maintain records of fuel supplier specifications which verify the sulfur content of the fuel, piped and/or as delivered. All records shall be maintained for five years.
[Locally Enforceable Condition]

[The Permittee shall be considered in compliance with this recordkeeping requirement by demonstrating that each engine was fired only by the specified fuel allowed, identified in Attachment 2 of this permit. Such a demonstration may be achieved by making available for the Control Officer's inspection, documentation, such as invoices or statements from the fuel supplier, showing that only the specified fuel was purchased for use in the equipment. Alternatively, the demonstration may be made by actual inspection of the equipment showing that the specified fuel is the only fuel supply plumbed to the equipment for firing.]

VIII. Testing Requirements

[PCC 17.20.010]

[Locally Enforceable Conditions]

For purposes of demonstrating compliance, these test methods shall be used, provided that for the purpose of establishing whether or not the facility has violated or is in violation of any provision of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable federal requirements if the appropriate performance or compliance procedures or methods had been performed.

[PCC 17.12.050]

A. Opacity

When required by the Control Officer, the Permittee shall perform EPA Method 9 visible emissions observations on the engines identified in this Section to demonstrate compliance with the opacity standard in II.D and II.E of this Section.

[PCC 17.12.040.B]

B. Fuel Limitation

When required, to determine the sulfur content of the fuel being fired for purposes of the reporting requirement in II.F of this Section, the following reference methods in the Arizona Testing Manual shall be used:

1. ASTM Method D-129-91 (Test Method for Sulfur in Petroleum Products) (General Bomb Method) for the sulfur content of liquid fuels.
2. ASTM Method D-1072-90 (Test Method for Total Sulfur in Fuel Gases) for the sulfur content of gaseous fuels.

C. Alternative Test Method

The Permittee may submit an alternate and equivalent test method(s) that is listed in 40 CFR Subpart 60, Appendix A, to the Control Officer in a test plan, for approval by the Control Officer.

[PCC 17.12.045.D]

SECTION B

**NEW AND EXISTING STATIONARY SOURCE PERFORMANCE STANDARDS FOR
FOSSIL-FUEL FIRED INDUSTRIAL AND COMMERCIAL EQUIPMENT**

(LOCALLY ENFORCEABLE CONDITIONS, UNLESS OTHERWISE STATED)

Unless otherwise stated, the provisions of this Section apply to the equipment identified in, Table 2, Attachment 2 of this permit.

I. Emission Limitations and Standards

A. Opacity Limitation

The Permittee shall not cause, allow or permit the effluent from any boiler to have an average optical density equal to or greater than 20 percent. [PCC 17.16.040]

B. Fuel Limitation

The Permittee shall burn natural gas fuel for the boilers in Table 2 of Attachment 2 of this Permit. [PCC 17.12.190.B]
[Material Permit Condition]

II. Monitoring Requirements

[PCC 17.12.185.A.3]

A. Opacity

A demonstration to show compliance with the emission limitation for opacity in I.A of this Section shall not be required since the percent of opacity of visible emissions whilst combusting natural gas is inherently low. The Permittee shall operate and maintain the boilers at all times - including periods of startup, shutdown, and malfunction - in a manner consistent with good air pollution control practices and consistent with manufacturer's guidelines.

B. Fuel

The Permittee shall be considered in compliance with the fuel limitation in I.B of this Section by actual inspection of the equipment showing that the specified fuel is the only fuel supply plumbed to the equipment for firing.

III. Recordkeeping Requirement

[PCC 17.12.185.A.4]

The Permittee shall maintain records of any emissions in excess of the limits established by this permit. All records shall be maintained for five years.

IV. Reporting Requirements

[PCC 17.12.185.A.5]

The Permittee shall report to the Control Officer any emissions in excess of the limits established by this permit according to the additional permit conditions of this permit. [PCC 17.12.040]

V. Testing Requirements

For purposes of demonstrating compliance, these test methods shall be used, provided that for the purpose of establishing whether or not the facility has violated or is in violation of any provision of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable federal requirements if the appropriate performance or compliance procedures or methods had been performed.

[PCC 17.12.050 and PCC 17.20.010]

A. Opacity

When requested, the Permittee shall perform EPA Method 9 visible emissions observations on the facility operations to demonstrate compliance with the opacity standard in I.A of this Section.

[PCC 17.12.040.B and PCC 17.20.010]

B. Fuel Limitation

When requested, the Permittee need only demonstrate that pipeline quality natural gas was fired exclusively in the boilers.

[PCC 17.12.185.A.3 and PCC 17.20.010]

C. Alternative Test Method

The Permittee may submit an alternate and equivalent test method(s) that is listed in 40 CFR Subpart 60, Appendix A, to the Control Officer in a test plan, for approval by the Control Officer.

[PCC 17.12.045.D]

VI. Facility Changes

Should the Permittee desire to change the facility or operations in any way (including, but not limited to, addition of new equipment, modification of current equipment or usage of fuels not specified within this Permit,) the Permittee will first submit the proper notification and follow the required permit revision procedure pursuant PCC 17.12.240, PCC 17.12.255, and PCC 17.12.260.

SECTION C

NEW AND EXISTING STATIONARY SOURCE PERFORMANCE STANDARDS FOR THE SURFACE COATING AND SOLVENT HANDLING ACTIVITIES

(LOCALLY ENFORCEABLE CONDITIONS, UNLESS OTHERWISE STATED)

Unless otherwise stated, the provisions of this Section apply to the equipment identified in Table 3, Attachment 2 of this permit

I. Emission Limitations and Standards

A. Surface Coating Overspray Control

Paint spraying operations, identified in Table 3 of Attachment 2 shall be conducted in an enclosed area equipped with controls containing no less than 96 percent of the overspray. [PCC 17.16.400.C.1]

B. Gaseous/Odororous Materials and VOC Control

1. The Permittee shall not emit gaseous or odororous materials from equipment, operations or premises under his control in such quantities or concentrations as to cause air pollution. [PCC 17.16.430.D]

2. All materials used in the facility which contain VOCs, shall be transported, stored, used and processed in a manner, and by such means that they will not evaporate, leak, escape or discharge into the ambient air so as to cause or contribute to air pollution. Where means are available to effectively reduce the contribution to air pollution from evaporation, leakage or discharge, the installation and use of such control methods, devices, or equipment shall be mandatory. [PCC 17.16.430.F]

II. Monitoring Requirements

[PCC 17.12.185.A.3]

A. Conditions for Confined Paint Spray Operations

The Permittee shall demonstrate compliance with the operational limitation for the surface coating operations required in I.A of this Section by retaining documentation detailing the specifications of the arrestance ratings of the filters used in the paint spray booths. [PCC 17.12.185.A.4]

B. Conditions for the Solvent Use Activities

Monitoring for gaseous/odororous materials to determine compliance with the standard in I.B.1 of this Section is not normally necessary as the use of good modern practices prevents the emission of odors beyond the property boundary.

III. Reporting Requirements

The Permittee shall report to the Control Officer any emissions in excess of the limits established by this permit according to the additional permit requirements of this permit. [PCC 17.12.040]

IV. Testing Requirements

None specified in Pima County Code.

SECTION D

GENERAL FACILITY-WIDE SPECIFIC STANDARDS

The provisions of this Section apply to all facility operations.

I. General Facility-Wide Conditions

A. Facility Changes

Before installing additional units, removing units, modifying existing emission equipment or switching fuels, the Permittee shall apply for the appropriate revision pursuant to PCC 17.12.235, PCC 17.12.255 or PCC 17.12.260. [PCC 17.12.185.A.2]

B. Air Pollution Control Equipment

Where a stack, vent or other outlet is at such a level that fumes, gas mist, odor, smoke, vapor or any combination thereof constituting air pollution are discharged to adjoining property, the Control Officer may require the installation of abatement equipment or the alteration of such stack, vent or other outlet by the owner or operator thereof to a degree that will adequately reduce or eliminate the discharge of air pollution to adjoining property. [PCC 17.16.020.B]

C. Odor Limiting Standard

1. The Permittee shall not cause or permit emissions from malodorous matter to cross a property line between the source and a residential, recreational, institutional, educational, retail sales, hotel, or business premise without minimizing the emissions by applying good modern practices. [PCC 17.16.030]
2. Monitoring for odors at the facility to determine compliance with the standard in I.C.1 of this Section is not normally necessary as the use of good modern practices prevents the emission of odors beyond the property boundary. The Control Officer may ask the Permittee to test for odor emissions if the Control Officer has reasonable cause to believe a violation of a standard has been committed. [PCC 17.12.010]

II. Recordkeeping Requirements

- A. All records required by this permit shall be retained for at least five years. [PCC 17.12.185.A.4.b]
- B. The Permittee shall retain all records relating to this permit and a copy of the permit at the permit site. If it is not feasible to maintain a copy of the permit onsite, the Permittee may request, in writing, to maintain a copy of the permit at an alternate location. Upon written approval by the Control Officer, the Permittee must maintain a complete copy of the permit at the approved alternative location. [PCC 17.12.080]

III. Reporting Requirements

[PCC 17.12.185.A.5]

The Permittee shall report to the Control Officer any emissions in excess of the limits established by this permit according to the additional permit conditions of this permit [PCC 17.12.040]

IV. Testing Requirements

Specific testing requirements are listed within each Section of this permit

ADDITIONAL PERMIT REQUIREMENTS

I. COMPLIANCE WITH PERMIT CONDITIONS

[PCC 17.12.185.A.7.a and b]

- A. The Permittee shall comply with all conditions of this permit including all applicable requirements of Arizona air quality statutes and the air quality rules. Any permit noncompliance constitutes a violation of the Arizona Revised Statutes and 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. The Permittee shall report to the Control Officer any emissions in excess of the limits established by this permit. The report shall be in 2 parts as specified below: [PCC 17.12.185.A.5 and PCC 17.12.040]
 - 1 Notification by telephone or facsimile within 24 hours of the time the Permittee first learned of the occurrence of excess emission that includes all available information pursuant to PCC 17.12.040.B. To report excess emissions call **520-724-7400** or fax to **520-838-7432**.
 - 2. Detailed written notification by submission of an excess emissions report within 72 hours of the notification in I.B.1 above. Send to **PDEQ 33 N. Stone Ave, Ste 700, Tucson, Arizona 85701**.
- C. 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.
- D. The permit does not convey any property rights of any sort, or any exclusive privilege to the permit holder.
- E. The Permittee shall pay fees to the Control Officer pursuant to PCC 17.12.520. [PCC 17.12.185.A.9 and PCC 17.12.520]

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

[PCC 17.12.185.A.7.c]

The permit may be revised, reopened, revoked and reissued, or terminated for cause pursuant to PCC 17.12.270. 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.

III. DUTY TO PROVIDE INFORMATION

[PCC 17.12.165.G & PCC 17.12.185.A.7.e]

- A. The Permittee shall furnish to the Control Officer, within a reasonable time, any information that the Control Officer may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the Control Officer copies of records required to be kept by the permit. For information claimed to be confidential, the Permittee shall furnish a copy of such records to the Control Officer along with a claim of confidentiality.
- B. If the Permittee has failed to submit any relevant facts or if the Permittee 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.

IV. SEVERABILITY CLAUSE

[PCC 17.12.185.A.6]

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

ATTACHMENT 1

APPLICABLE REGULATIONS

Requirements Specifically Identified as Applicable:

Code of Federal Regulations Title 40:

40 CFR Part 63 Subpart ZZZZ: National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines

Applicable to the diesel fired emergency generators. Honeywell International Inc., is an affected facility under 40 CFR Part 63 Subpart ZZZZ.

Pima County Code (PCC) Title 17:

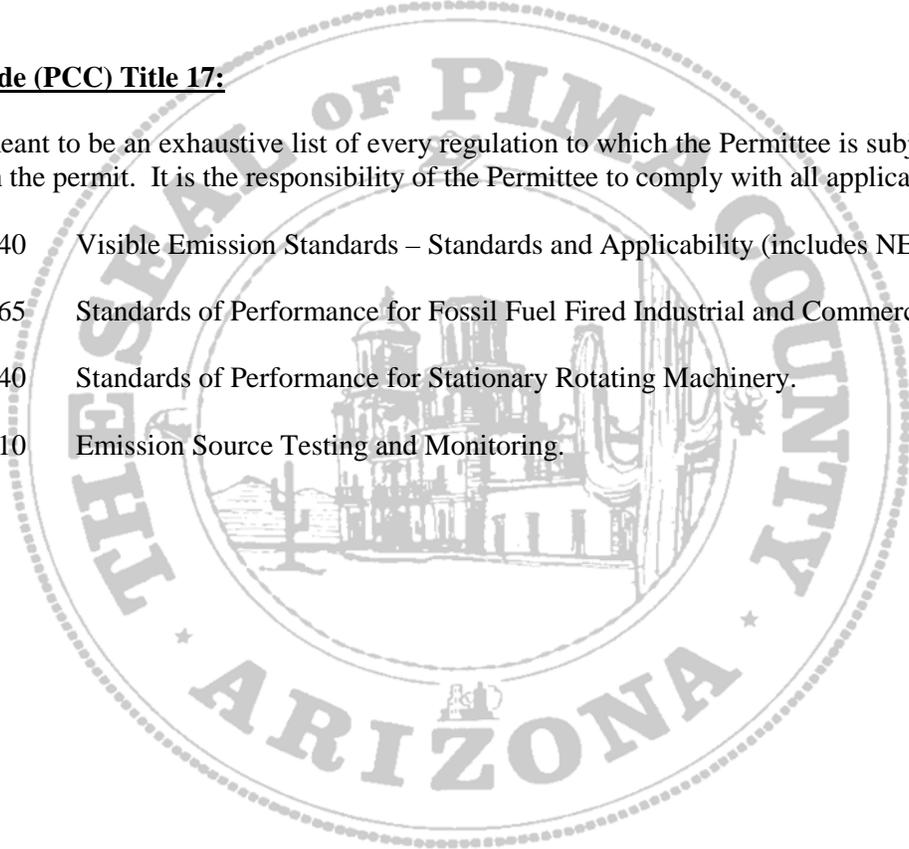
This is not meant to be an exhaustive list of every regulation to which the Permittee is subject, but represents those cited in the permit. It is the responsibility of the Permittee to comply with all applicable regulations.

PCC 17.16.040 Visible Emission Standards – Standards and Applicability (includes NESHAP).

PCC 17.16.165 Standards of Performance for Fossil Fuel Fired Industrial and Commercial Equipment.

PCC 17.16.340 Standards of Performance for Stationary Rotating Machinery.

PCC 17.20.010 Emission Source Testing and Monitoring.



ATTACHMENT 2

EQUIPMENT LIST

TABLE 1
Stationary Rotating Machinery (Subject to NESHAP Subpart ZZZZ)

Type of Equipment	Manufacture	Model	Serial Number/ ID number	Maximum Rated Capacity	Allowable Hours of Operation (As a rolling 12 month total, Maintenance and Testing Only)	Model year/ Applicability Date ¹	Allowable Fuel(s)
Emergency Generator	Kohler	80R0Z27	175447	134 HP	100	~ 1985	Diesel
Fire Pump Engine	Caterpillar	3208	3204719	235 HP	100	~ 1985	Diesel

¹ The most recent date of order, manufacture, reconstruction, or modification.

TABLE 2
Fossil-Fuel Fired Industrial and Commercial Equipment (Boilers, not subject to NSPS, Section B)

Type of Equipment	Manufacturer	Model	Serial Number	Maximum Rated Capacity	Primary Fuel	Date of Manufacture	Date of Installation
Boiler	Sellars	5X-125-W YGNIS	98473-2	5.231 MMBTU/hr	Natural Gas	~ 1985	~ 1986
Boiler	Sellars	5X-125-W YGNIS	98473-1	5.231 MMBTU/hr	Natural Gas	~ 1985	~ 1986

TABLE 3

Surface Coating and Solvent Use Activities

Type of Equipment	Description	Equipment Location	Estimated Overspray Control Efficiency
Spray Booth	Dual	Electronics Paint Shop	99.4 %
Spray Booth	Dual	Conformal Coat (ME2)	99.4 %
Spray Booth	Single	Generators OEM (ME2)	99.4 %



TABLE 4

INSIGNIFICANT ACTIVITIES / DE MINIMIS EQUIPMENT

De Minimis Equipment		Rated Capacity	Quantity
1	Electric Curing Ovens (1 x BEMCO - Model 208, 10 x Blue M - various models, 3 x Lindberg - Model 51542, 1 x Precos - Model 530-554-H, 1 x RANSCO Industries - Model 7203, 4 x VWR - Model 1655D, and 1 x VWR - Model 1430)	-	21
2	Electric Salt Fog Chamber (1 x Honeywell - Model Salt Fog Chamber)	-	1
3	Electric Vacuum Oven (2 x NAPCO - Model 5861)	-	2
4	Steam Age Chamber (1 x Mountain Gate Engineering - Model SA2-5-1112)	-	1
5	Electric Reflow Oven (1 x Vitronics)	-	1
6	Electric/Liquid Nitrogen Temperature Chambers (49 x BEMCO - various models, 2 x D/I - Model PRC2-24-IE, 1 x Despatch - Model VRO-26-1E, 1 x Lindberg - Model 5542, 1 x Qualmark - Model OVS 2.5 HP, 3 x Sheldon - Model 1370 FM/WWR, 3 x Sigma - Model CC-3, 1 x Statham - Model SD521-900E, 40 x Thermodynamics - various models, 1 x Tenney Eng. Inc - Model Tenney Jr., 1 x Thermoline - Model Series 9000, 9 x Thermotron - various models, and 2 x VMR - Model 1630D)	-	114
7	Hood, fume - various sizes	-	33
8	Fire Pump Fuel Tank, aboveground storage - diesel	315	1
9	Abrasive blasting cabinets - Trinco 36/BP2; bead blast cabinet vented to BP2 dust collector located indoors	-	1
10	Abrasive blasting cabinet - Econoline 24"x24"x48"; bead blast (Polyplus media) cabinet vented to dust collector located indoors	-	1
11	ID Slicer - Slicing Specialists	-	1
12	CNC Grinder - Model APG 1632	-	1
13	Electrostatic Precipitator - Model Trion 1820301	-	1
14	Parts Washing Baths (IPA & MEK)	~10-15 GAL	3
15	Parts Washing Baths (Hydrofluoric Acid, 5-10%)	~5 GAL	10
16	Equipment used for the purpose of preparing food for human consumption	-	-