

PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY

150 West Congress Street • Tucson, Arizona 85701 • Phone: (520) 740-3340

AIR QUALITY OPERATING PERMIT

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



ISSUED TO

**KALIL BOTTLING CO.
931 S. HIGHLAND AVE
TUCSON, AZ 85719**

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

THIS PERMIT ISSUED SUBJECT TO THE FOLLOWING Conditions contained in Attachments "A", "B", "C" and "D".

PDEQ PERMIT NUMBER 251 PERMIT CLASS II EXPIRATION DATE December 19, 2010

PERMIT ISSUED THIS 20th DAY OF DECEMBER TWO THOUSAND AND FIVE


SIGNATURE

Tina Gingras, Air Program Manager, PDEQ
TITLE

TABLE OF CONTENTS

Summary..... 3

Part "A": General Provisions..... 4

- I. Permit Expiration and Renewal 4
- II. Compliance with Permit Conditions..... 4
- III. Permit Revision, Reopening, Revocation and Reissuance, or Termination for Cause 4
- IV. Posting of Permit 5
- V. Fee Payment..... 5
- VI. Annual Emissions Inventory Questionnaire 5
- VII. Compliance Certification 6
- VIII. Certification of Truth, Accuracy and Completeness..... 6
- IX. Inspection and Entry 6
- X. Permit Revision Pursuant to Federal Hazardous Air Pollutant Standard..... 7
- XI. Affirmative Defenses for Excess Emissions Due to Malfunctions, Startup, and Shutdown 7
- XII. Record Keeping Requirements 9
- XIII. Reporting Requirements 10
- XIV. Duty to Provide Information..... 11
- XV. Permit Amendment or Revision..... 12
- XVI. Facility Change Without Permit Revision 12
- XVII. Testing Requirements 13
- XVIII. Property Rights 14
- XIX. Severability Clause 14
- XX. Permit Shield..... 15
- XXI. Accident Prevention Requirements Under the Clean Air Act (CAA Section 112(r)) 15

Summary of Part "B" conditions..... 16-17

Part "B": Specific Conditions..... 18

- I. Applicability 18
- II. Emission Limits and Standards..... 18
- III. Monitoring Requirements 20
- IV. Recordkeeping Requirements..... 21
- V. Reporting requirements..... 22
- VI. Testing Requirements 23

Part "C": Applicable Regulations..... 25

Part "D": Equipment List..... 26

**Kalil Bottling Co,
Air Quality Permit # 251**

Summary

This operating permit is the second 5-year renewal issued to Kalil Bottling Co, the Permittee. The source manufactures and distributes soft drinks and is an existing **Class II true minor stationary source** for all criteria pollutants.

The following emission rates are for reference purposes only and are not intended to be enforced by direct measurement unless otherwise noted in Part B of this permit.

Pollutant	Tons per Year
Nitrogen Oxides (NO _x)	5.32
Carbon Monoxide (CO)	4.47
Volatile Organic Compounds (VOC)	0.38
Particulate Matter (as PM ₁₀)	0.40
Sulfur Oxides (SO _x)	0.80
Hazardous Air Pollutants (HAPs) - Aggregate	0.02

PART A: GENERAL PROVISIONS

(References to A.R.S. are references to the Arizona Revised Statutes, references to A.A.C. are references to the Arizona Administrative Code, and references to PCC are references to Title 17 of the Pima County Code)

- I. PERMIT EXPIRATION AND RENEWAL [A.R.S. § 49-480.A, PCC 17.12.160.C.2 & PCC 17.12.180.A.1]
- A. This permit is valid for a period of five years from the date of issuance of the permit.
- B. The Permittee shall submit an application for renewal of this permit at least 6 months, but not greater than 18 months prior to the date of permit expiration.
- II. COMPLIANCE WITH PERMIT CONDITIONS [PCC 17.12.180.A.8.a & 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. Need to halt or reduce activity not a defense. 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 [PCC 17.12.180.A.8.c & PCC 17.12.270]
- 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, or 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. Additional applicable requirements under the Act become applicable to a major source. Such reopening shall only occur if there are three or more years remaining in the permit term. The reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to PCC 17.12.280. Any permit reopening required pursuant to this paragraph shall comply with provisions in PCC 17.12.280 for permit renewal and shall reset the five-year permit term.
 2. Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the Class I permit.

3. The control officer 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.
 4. The control officer 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 issue a permit, including appeal of any final action relating to a permit reopening, shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopenings shall be made as expeditiously as practicable. Permit reopenings for reasons other than those stated in paragraph III.B.1 of this Part shall not result in the resetting of the five-year permit term.

IV. POSTING OF PERMIT

[PCC 17.12.080]

- A. Permittee shall post such permit, or a certificate of permit issuance on location where the equipment is installed in such a manner as to be clearly visible and accessible. All equipment covered by the permit shall be clearly marked with one of the following:
1. Current permit number.
 2. Serial number or other equipment number that is also listed in the permit to identify that piece of equipment.
- B. In the event that the equipment is so constructed or operated that such permit cannot be so placed, the permit shall be mounted so as to be clearly visible in an accessible place within a reasonable distance of the equipment or maintained readily available at all times on the operating premises.
- C. A copy of the complete permit shall be kept on the site.

V. FEE PAYMENT

[PCC 17.12.180.A.9 & PCC 17.12.510]

Permittee shall pay fees to the control officer pursuant to A.R.S. § 49-480.D and PCC 17.12.510.

VI. ANNUAL EMISSIONS INVENTORY QUESTIONNAIRE

[PCC 17.12.320]

- A. When requested by the control officer, the Permittee shall complete and submit an annual emissions inventory questionnaire. The questionnaire is due by March 31 or ninety days after the control officer makes the request and provides the inventory form 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 or approved by the control officer and shall include the information required by PCC 17.12.320.

VII. COMPLIANCE CERTIFICATION

[PCC 17.12.180.A.5 & PCC 17.12.220.A.2]

Permittee shall submit to the control officer a compliance certification that describes the compliance status of the source with respect to each permit condition. Certifications shall be submitted as specified in Part “B” of this permit.

A. The compliance certification shall include the following:

1. Identification of each term or condition contained in the permit including emission limitations, standards, or work practices that are the basis of the certification;
2. Identification of method(s) or other means used by the owner or operator for determining the compliance status of the source with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required under the monitoring, related recordkeeping and reporting sections of this permit;
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 identify each deviation and take it into account in the compliance certification; and
4. A progress report on all outstanding compliance schedules submitted pursuant to PCC 17.12.220.

B. A copy of all compliance certifications for Class I permits shall also be submitted to the EPA Administrator.

The address for the EPA administrator is:

EPA Region 9 Enforcement Office, 75 Hawthorne St (Air-5), San Francisco, CA 94105

VIII. CERTIFICATION OF TRUTH, ACCURACY AND COMPLETENESS

[PCC 17.12.220.A.3]

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 and any other certification required by this permit 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

[PCC 17.12.220.A.4]

The Permittee shall allow the control officer or the authorized representative of the control officer upon presentation of proper credentials to:

A. 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 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 [PCC 17.12.160.C.4]

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. AFFIRMATIVE DEFENSES FOR EXCESS EMISSIONS DUE TO MALFUNCTIONS, STARTUP, AND SHUTDOWN [A.R.S. §49-480.B & A.A.C. 18-2-310]

A. Applicability. This permit condition 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:

1. Promulgated pursuant to Sections 111 or 112 of the Act,
2. Promulgated pursuant to Titles IV or VI of the Clean Air Act,
3. Contained in any Prevention of Significant Deterioration (PSD) or New Source Review (NSR) permit issued by the U.S. E.P.A.,
4. Contained in PCC 17.16.280.F, or
5. Included in a permit to meet the requirements of PCC 17.16.590.A.5.

B. Affirmative Defense for Malfunctions

Emissions in excess of an applicable emission limitation due to malfunction shall constitute a violation. The owner or operator of a source with emissions in excess of an applicable emission limitation due to malfunction 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 owner or operator of the source has complied with the reporting requirements of XIII.B of this Part and has demonstrated all of the following:

1. The excess emissions resulted from a sudden and unavoidable breakdown of process equipment or air pollution control equipment beyond the reasonable control of the operator;
2. 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;
3. 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 owner or operator satisfactorily demonstrated that the measures were impracticable;
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. The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance;
7. During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in PCC Chapter 17.08 that could be attributed to the emitting source;
8. 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;
9. All emissions monitoring systems were kept in operation if at all practicable; and
10. The owner or operator's actions in response to the excess emissions were documented by contemporaneous records.

C. Affirmative Defense for Startup and Shutdown

1. Except as provided in XI.C.2, 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. The owner or operator of a source with emissions in excess of an applicable emission limitation due to startup and shutdown 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 owner or operator of the source has complied with the reporting requirements of XIII.B of this Part and has demonstrated all of the following:
 - a. The excess emissions could not have been prevented through careful and prudent planning and design;

- b. 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;
- c. The source's 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;
- 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. During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in PCC Chapter 17.08 that could be attributed to the emitting source;
- g. All emissions monitoring systems were kept in operation if at all practicable; and
- h. The owner or operator's actions in response to the excess emissions were documented by contemporaneous records.

2. If excess emissions occur due to a malfunction during routine startup and shutdown, then those instances shall be treated as other malfunctions subject to XI.B.

D. 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 XI.B.

E. Demonstration of Reasonable and Practicable Measures

For an affirmative defense under XI.B or C, the owner or operator of the source shall demonstrate, through submission of the data and information required by this Section and XII.B, that all reasonable and practicable measures within the owner or operator's control were implemented to prevent the occurrence of the excess emissions.

XII. RECORD KEEPING REQUIREMENTS

[PCC 17.12.180.A.4]

A. 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. 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 for continuous monitoring instrumentation, and copies of all reports required by the permit.

XIII. REPORTING REQUIREMENTS

[PCC 17.12.180.A.5.a]

The Permittee shall comply with all of the reporting requirements of this permit. These include all of the following:

- A. Compliance certifications pursuant to Part "A", Section VII of this permit.
- B. Excess Emissions Reporting Requirements [PCC 17.28.065, A.R.S. §49-480.B & A.A.C. 18-2-310.01]

1. The owner or operator of any source shall report to the control officer any emissions in excess of the limits established by this permit. The report shall be in two parts as specified below:

- a. ★ Notification by telephone or facsimile within 24 hours of the time the owner or operator first learned of the occurrence of excess emissions that includes all available information from XIII.B.2.

The number to call to report excess emissions is **520-740-3340**.

- b. Detailed written notification by submission of an excess emissions report within 72 hours of the notification under XIII.B.1.a.

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2. The excess emissions report shall contain the following information:
 - a. The identity of each stack or other emission point where the excess emissions occurred;

- b. The 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;
 - c. The time and duration or expected duration of the excess emissions;
 - d. The identity of the equipment from which the excess emissions emanated;
 - e. The nature and cause of the emissions;
 - f. The steps taken, if the excess emissions were the result of a malfunction, to remedy the malfunction and the steps taken or planned to prevent the recurrence of the malfunctions;
 - g. The steps that were or are being taken to limit the excess emissions; and
 - h. If the source's permit contains procedures governing source operation during periods of startup or malfunction and the excess emissions resulted from startup or malfunction, a list of the steps taken to comply with the permit procedures.
3. 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 the 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 XIII.B.1 and 2.
- C. Permit Deviations (Other Than Excess Emissions) Reporting Requirements. 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. For the purposes of this condition, "promptly report" shall mean that the Permittee submitted the report to the control officer by certified mail or hand-delivery within two working days of the of time the deviation was discovered.
- D. Reporting requirements listed in Part "B" of this permit.

XIV. DUTY TO PROVIDE INFORMATION

[PCC 17.12.160.G & PCC 17.12.180.A.8.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, for Class I sources, 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 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.

XV. PERMIT AMENDMENT OR REVISION [PCC 17.12.240, PCC 17.12.250 & PCC 17.12.260]

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

- A. Administrative Permit Amendment (PCC 17.12.240.);
- B. Minor Permit Revision (PCC 17.12.250.);
- C. Significant Permit Revision (PCC 17.12.260.).

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

XVI. FACILITY CHANGE WITHOUT PERMIT REVISION [PCC 17.12.230]

- A. Permittee may make changes at the permitted source without a permit revision if all of the following apply:
 - 1. The changes are not modifications under any provision of Title I of the Act or under A.R.S. § 49-401.01(17).
 - 2. The changes do not exceed the emissions allowable under the permit whether expressed therein as a rate of emissions or in terms of total emissions.
 - 3. The changes do not violate any applicable requirements or trigger any additional applicable requirements.
 - 4. The changes satisfy all requirements for a minor permit revision under PCC 17.12.250.
 - 5. The changes do not contravene federally enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.
- B. The substitution of an item of process or pollution control equipment for an identical or substantially similar item of process or pollution control equipment shall qualify as a change that does not require a permit revision, if it meets all of the requirements of subsections (A) and (C) of this Section.
- C. For each such change under subsections A and B of this Section, a written notice by certified mail or hand delivery shall be received by the control officer and, for Class I permits, the Administrator, a minimum of 7 working days in advance of the change. Notifications of changes associated with emergency conditions, such as malfunctions necessitating the replacement of equipment, may be provided less than 7 working days in advance of the change but must be

provided as far in advance of the change as possible or, if advance notification is not practicable, as soon after the change as possible. Each notification shall include:

1. When the proposed change will occur.
2. A description of each such change.
3. Any change in emissions of regulated air pollutants.
4. The pollutants emitted subject to the emissions trade, if any.
5. The provisions in the implementation plan that provide for the emissions trade with which the source will comply and any other information as may be required by the provisions in the implementation plan authorizing the trade.
6. If the emissions trading provisions of the implementation plan are invoked, then the permit requirements with which the source will comply.
7. Any permit term or condition that is no longer applicable as a result of the change.

XVII. TESTING REQUIREMENTS

[PCC 17.12.050]

A. Operational Conditions During Testing

Tests shall be conducted while the unit is operating at full load under representative operational conditions unless other conditions are required by the applicable test method or in this permit. With prior written approval from the control officer, testing may be performed at a lower rate. Operations during start-up, shutdown, and malfunction (as defined in PCC 17.04.340.A.) shall not constitute representative operational conditions unless otherwise specified in the applicable requirement.

B. Test Plan

At least 14 calendar days prior to performing a test, the Permittee shall submit a test plan to the control officer, in accordance with PCC 17.12.050.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.

C. Stack Sampling Facilities

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 platforms;
3. Safe access to sampling platforms; and
4. Utilities for sampling and testing equipment.

D. Interpretation of Final Results

Each performance test shall consist of three separate runs using the required test method. Each run shall be conducted in accordance with the applicable standard and test method. For the purpose of determining compliance with an applicable standard, the arithmetic means of results of the three runs shall apply. If a sample is accidentally lost or conditions occur which are not under the Permittee's control and which may invalidate the run, compliance may, upon the control officer's approval, be determined using the arithmetic mean of the other two runs.

E. Report of Final Test Results

A written report of the results of all performance tests shall be submitted to the control officer within 30 days after the test is performed. The report shall be submitted in accordance with the Arizona Testing Manual and PCC 17.12.050.A.

F. Cessation of Testing After the First Run Has Started

If the control officer or the control officer'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 conditions 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 that demonstrates good cause must be submitted. ★

XVIII. PROPERTY RIGHTS

[PCC 17.12.180.A.8.d]

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

XIX. SEVERABILITY CLAUSE

[PCC 17.12.180.A.7]

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.

XX. PERMIT SHIELD

[PCC 17.12.310]

Compliance with the conditions of this permit shall be deemed compliance with the applicable requirements identified in Part "C" of this permit. The permit shield shall not apply to any change made pursuant to Section XV.B of this Part and Section XVI of this Part.

XXI. ACCIDENT PREVENTION REQUIREMENTS UNDER THE CLEAN AIR ACT (CAA Section 112(r))

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the accidental release prevention regulations in Part 68, then the Permittee shall submit a risk management plan (RMP) by the date specified in Section 68.10 and shall certify compliance with the requirements of Part 68 as part of the semiannual compliance certification as required by 40 CFR Part 70 and Part "B" of this permit.



**Kalil Bottling Co,
Air Quality Permit # 251**

Part B: Summary of Part B Requirements

Emission Unit	Pollutants Emitted	Control Measures	Emission Limits & Standards	Monitoring	Recordkeeping	Reporting (All Operations)	Testing Frequency & Methods
Applicable to NSPS Equipment Only (Equipment ID: AUX015)	NO _x , CO	See individual equipment control requirements	Limit opacity ≤ 40 % from point sources. Limit opacity ≤ 20 % from point sources (effective April 23, 2006) Permittee shall combust only pipeline quality natural gas.	Determination of the daily fuel consumption.	Retention of records for a period of two years. (See also general standards).	Notification of the date of construction or reconstruction, anticipated startup and actual startup. Design heat input capacity. Identification of fuel to be combusted. Annual capacity factor. (See also general standards).	EPA Test Method 5 for particulate matter. EPA Test Method 9 for opacity. EPA Test Method 6 for sulfur dioxide. EPA Test Method 7E for nitrogen oxides.

Continued on page 17:

Summary of Part B Requirements continued:

Emission Unit	Pollutants Emitted	Control Measures	Emission Limits & Standards	Monitoring	Recordkeeping	Reporting (All Operations)	Testing Frequency & Methods
<p>Surface Coating (Paint Spraying)</p> <p>(Equipment listed as such in Part "D" Table 2 of this permit).</p>	<p>PM</p>	<p>Enclosed Spray Booth.</p>	<p>Minimum of 96% of overspray required to be captured.</p> <p>PDEQ Technical Procedure TECH-202 for guidance on overspray controls.</p> <p>Controls to minimize organic solvent emissions</p> <p>VOC emissions limitation for the application of coatings using the coating applicator.</p>	<p>Sprayable VOC emissions from coating applicator.</p>	<p>MSDS or product specification sheets.</p> <p>Technical data sheet(s) of the coating as applied</p> <p>VOC coating log: type of coating applied and derivation of total sprayable VOC content of coating applied.</p>	<p>None additional</p> <p>(See also general standards).</p>	<p>None.</p>
<p>General Standards</p> <p>All Operations</p>	<p>PM10, SO_x, No_x, CO, VOC</p>	<p>See individual equipment control requirements.</p>	<p>Necessary and feasible measures to control VOC evaporation, leakage and discharge during transportation and storage.</p> <p>No visible emission beyond property boundary.</p> <p>Limit odor from equipment so as not to cause air pollution.</p>	<p>Visibility determination using EPA Method 9.</p>	<p>Retention and location of records and permit posting requirements.</p> <p>Fuel supplied/used information.</p>	<p>Promptly submit reports of permit deviations.</p> <p>Semiannual summary reports of required monitoring.</p> <p>Annual compliance certification reports.</p> <p>Emissions inventory report when requested.</p>	<p>EPA Test Method 9 shall be used to monitor compliance with the opacity standard.</p> <p>Alternative test methods upon approval of The Director.</p>

**Permit Issued To: Kalil Bottling Co,
Air Quality Permit # 251**

Part B: Specific Conditions

[References are to Title 17 of the Pima County Code unless otherwise noted]

I. Applicability

This is an existing Class II *true minor* stationary source. The potential to emit emissions are below Pima County Code permit threshold requirements, however since the source operates a boiler incorporated after June 9, 1989, with a capacity >10 million Btu/hour; the source is subject to New Source Performance Standards Part 60, Subpart Dc.

The affected facilities are grouped into the following emission limitation categories:

- A. New source Performance Standards (NSPS): Performance for Small Industrial - Commercial - Institutional Steam Generating Units.
- B. Surface Coating (Paint Spraying).

II. Emission Limits & Standards:

- A. Facilities subject to NSPS: Performance for Small Industrial - Commercial - Institutional Steam Generating Units.

[40 CFR §60.40c & PCC 17.16.490.A.12]

[Federally Enforceable Conditions]

The provisions of this section are applicable to the Miura Steam Boiler (Equipment ID AUX015) identified as such in Part 'D' Table 1 of this permit.

1. Opacity Standard

- a. No person shall cause, allow, or permit to be emitted into the atmosphere, emissions that exceed an average of 40 percent opacity for any 6-consecutive minutes.

[SIP 321 & PCC 17.16.130.B.2]

[Federally Enforceable Condition]

- b. After April 23, 2006, except as otherwise provided in this permit relating to specific types of sources, the opacity of any plume or effluent from an existing, stationary, point source shall not exceed 20%.

[PCC 17.16.130.B.3]

2. Fuel Limitation

Permittee shall combust only pipeline quality natural gas in the Miura boiler. For the purpose of this Part, a pipeline quality natural gas shall mean natural gas that meets the requirements of the Federal Energy Regulatory Commission (FERC) approved Tariff agreement that limits transmission to pipeline quality natural gas of sulfur content to less than 5 grains of sulfur per 100 scf of natural gas and a lower heating value greater than or equal to 967 Btu/ft³.

[PCC 17.12.180.A.2, PCC 17.12.190.B & PCC 17.12.350.A.3.a]

[Federally Enforceable Condition & Material Permit Condition]

B. Surface Coating (Paint Spraying)

1. General Provision

The provision of this sub section is applicable to surface coating operations subject to Title 17 of the Pima County Code, identified as such in Part 'D' Table 2 and 3 of this permit.

The Permittee shall conduct all paint spraying operations, other than architectural coating and spot painting, in the paint spray booth identified in Table 2 to comply with the 96% overspray requirement. [PCC 17.16.400.C.1]

[Reference Pima County Department of Environmental Quality Technical Procedure TECH-202 for interpretation of the above overspray requirement.]

2. Miscellaneous Metal Parts

The provisions of this sub section are applicable to surface coating of miscellaneous metal parts (vending machines). At any time a miscellaneous metal is surface coated, the permittee shall ensure:

a. emissions of volatile organic compound do not exceed 4.3 pounds per gallon (0.5 kilograms per liter) of coating, excluding water, delivered to a coating applicator that applies clear coatings. [PCC 17.16.400.C.5.a]

b. emissions of volatile organic compound do not exceed 3.5 pounds per gallon (0.42 kilograms per liter) of coating, excluding water delivered to a coating applicator in a coating application system that is air dried or forced warm air dried at temperatures up to 194°F (90°C). [PCC 17.16.400.C.5.b]

c. All VOC emissions from solvent washings shall be considered in the emission limitations in subdivision 2.a and b. of this subsection unless the solvent is directed into containers that prevent evaporation into the atmosphere. [PCC 17.16.400.C.7]

C. General Standards

1. Volatile Organic Compounds Limitation (VOC)

The permittee shall not transport or store VOCs without taking necessary and feasible measures to control evaporation, leakage and other discharge into the atmosphere. [PCC 17.16.400]

2. Visible Emissions Limiting Standard

a. Permittee shall not cause or permit the airborne diffusion of visible emissions, excluding water vapor, beyond the property boundary line without appropriately controlling the emissions at the point of discharge. [SIP Rule 343, & PCC 17.16.050.D]

[Federally Enforceable Condition]

- b. The provisions of II.C.2.a of this part does not apply when the naturally induced wind speed exceeds 25 miles per hour as estimated by a certified visible emissions evaluator using the Beaufort Scale of Wind-Speed equivalents, or as recorded by a U.S. weather Bureau Station or a U.S. government military installation.

[SIP Rule 343]

[Federally Enforceable Condition]

3. Odor Limiting Standard

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.

[SIP Rule 344.A & PCC 17.16.030]

[Federally Enforceable Condition]

III Monitoring Requirements

A. Facilities subject to NSPS: Performance for Small Industrial – Commercial - Institutional Steam Generating Units.

The provisions of this section are applicable to the Miura steam boiler (Equipment ID AUX015) identified as such in Part ‘D’ Table 1 of this permit.

1. The Permittee shall monitor the amounts of fuel combusted during each day.

[40 CFR 60.48c(g)]

[Federally Enforceable Condition]

- a. Units fired exclusively with natural gas are exempt from the daily fuel combusted monitoring requirements of III.A.1. The Permittee is however required to demonstrate an acceptable way of recording the natural gas used in the Miura Boiler.

[EPA DETERMINATION DETAIL CONTROL NUMBER 0300118]

- b. If the Miura Steam Boiler shares a common fuel system with other units, the Permittee shall propose an acceptable way of apportioning this total fuel usage in order to determine the amount of natural gas used in the Miura Boiler. This may be based upon combined monthly fuel consumption and relevant operating times and parameters, such as boiler output or design heat input capacity for each unit, or by dividing each boilers design heat input capacity by the total of the design heat input capacities of all the boilers, and then using this quantity to prorate the natural gas usage for each boiler on a monthly basis.

[EPA DETERMINATION DETAIL CONTROL NUMBER 0300118]

2. Permittee shall be considered in compliance with II.A.2 of this part by demonstrating that only commercially available pipeline quality natural gas fuel was fired in the equipment listed in this Part. Such a demonstration may be by making available to the Control Officer for his inspection, documentation, such as invoices or statements from the fuel supplier, showing that only commercial natural gas was purchased for use in the equipment. Alternatively, the demonstration may be made by actual inspection of the equipment showing that pipeline natural gas is the only fuel supply plumbed to the equipment for firing.

[PCC 17.12.180.A.3]

B. Surface Coating (Paint Spraying)

The provisions of this section are applicable to surface coating operations subject to Title 17 of the Pima County Code, as such in Part ‘D’ Table 2 of this permit.

To determine compliance with Part 'B' II.B.2., 'surface coating of miscellaneous metal parts', the Permittee shall monitor the VOC emissions from the surface coating (paint spraying) operations. This monitoring requirement may be demonstrated by making available to the Control Officer for his inspection all of the following information: [PCC 17.12.180.A.3]

1. The material safety data sheets or product specification sheets of all material used in the formulation the coating as applied in the coating application system;
2. The technical data sheet(s) of the coating when applied through the coating application system; and
3. A VOC coating log including the mix ratio of the material used to formulate the coating, the type of coating applied (i.e. clear coat) and the derivation of the total sprayable VOC content. If the permittee choose to emit less than 3.5 pounds per gallon VOC for all coatings, they do not have to log the coating type used.

C. General Standards

Compliance with the opacity standard referenced in II.A.1 of this part shall be determined by using EPA Test Method 9. [PCC 17.16.040]

IV Recordkeeping Requirements

A. Facilities subject to NSPS: Performance for Small Industrial – Commercial - Institutional Steam Generating Units.

The provisions of this section are applicable to the Miura steam boiler (Equipment ID AUX015) identified as such in Part 'D' Table 1 of this permit.

1. The Permittee shall retain all records of the affected facility in III.A of this part for a period of two years following the date of such record. [40 CFR 60.48c(i)]
[Federally Enforceable Condition]
2. The Permittee shall retain all records of the amount of natural gas burned in the Miura Boiler. [EPA DETERMINATION DETAIL CONTROL NUMBER 0300118]

B. Surface Coating (Paint Spraying)

The Permittee shall retain all records of the VOC emissions from the surface coating application system, including: [PCC 17.12.180.A.4]

1. Material safety data sheets of all material used in the formulation the coating as applied in the coating application system.
2. All technical data sheets of the coating as applied through the coating application system.
3. All technical calculations undertaken to determine the final VOC content of the coating in lbs/gallon as applied through the coating applicator.

C. General Standards

1. The Permittee shall retain all records relating to this permit, and a copy of the permit at the permit site. [PCC 17.12.080.C]
2. The Permittee shall comply with the permit posting requirements of Part "A", Section IV of this permit. All records shall be maintained in accordance with the requirements of Section XII. of Part "A" of this permit. [PCC 17.12.080 & PCC 17.12.180.A.4]
3. The Permittee shall retain all records of fuel certifications or a copy of the FERC limiting the allowable sulfur content of pipeline natural gas below 0.9 percent. [PCC 17.12.180.A.4]

V. Reporting Requirements

A. Facilities subject to NSPS: Performance for Small Industrial – Commercial - Institutional Steam Generating Units

The provisions of this section are applicable to the Miura steam boiler (Equipment ID AUX015) as such in Part 'D' Table 1 of this permit.

1. The Permittee shall submit notification of the date of construction or re-construction, anticipated startup, and actual startup as provided by 40 CFR §60.7. This notification shall include:
[40 CFR §60.48c(a)]
[Federally Enforceable Condition]
 - a. The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility. [40 CFR §60.48c (a)(1)]
[Federally Enforceable Condition]
 - b. The annual capacity factor at which the owner or operator anticipates operating the Miura Boiler based on the fuel fired; [40 CFR §60.48c (a)(3)]
[Federally Enforceable Condition]

[Annual capacity factor means the ratio between the actual heat input to a steam generating unit from an individual fuel or combination of fuels during a period of 12 consecutive calendar months and the potential heat input to the steam generating unit from all fuels had the steam generating unit been operated for 8760 hours during that 12 month period at the maximum design heat input capacity.] [40 CFR §60.41c]
[Federally Enforceable Condition]
2. The Permittee shall annually submit to the Control Officer the reports required under IV.A of this permit. [EPA DETERMINATION DETAIL CONTROL NUMBER 0300118]
3. The Permittee shall annually submit to the Control Officer the amount of natural gas burned in the Miura Boiler. [EPA DETERMINATION DETAIL CONTROL NUMBER 0300118]

B. All Operations

The provisions of this section are applicable to all operations subject to NSPS, SIP Rules and Title 17 of the Pima County Code, as such identified in Part 'D' of this permit.

1. Reporting for the Affected Source or Process

Permittee shall promptly submit written reports to the Control Officer of any instances of deviation from permit requirements. (refer to Section XIII of Part "A" of this permit). [PCC 17.12.180.A.5]

2. Semiannual Summary Reports of Required Monitoring

Permittee shall submit a semiannual summary report of all monitoring, permit deviations and exceedances that have occurred during the reporting period. Semiannual reports shall be due on January 31st and July 31st of each year and shall cover the period July 1st through December 31st and January 1st through June 30th, respectively. The first semiannual report may not cover a six-month period. If there are no deviations or exceedances in a reporting period, no report shall be required. [PCC 17.12.180.A.5.a.]

3. Compliance Certification Reporting

Permittee shall submit an annual compliance certification to the Control Officer pursuant to Part "A", Section VII. Annual compliance certification reports shall be due on January 31st of each year and shall cover the period January 1st through December 31st. The first annual report may not cover a 12-month period. [PCC 17.12.220.A.2]

4. Emissions Inventory Reporting

Every source subject to a permit requirement shall complete and submit to the control officer, when requested, an annual emissions inventory questionnaire pursuant to 17.12.320 of the Pima County Code. (See Section VI of Part "A" of this permit). [PCC 17.12.320]

VI. Testing Requirements – All operations

For purposes of District enforcement, 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 17.20.010]

Permittee shall use the following EPA approved reference test methods to conduct performance tests for the specified pollutants when required:

A. Opacity

EPA Test Method 9 shall be used to monitor compliance with II.A of this Part when required or requested by the control officer. [PCC 17.12.040.B & PCC 17.12.180.A.3]

B. Fuel Limitation

The permittee need only demonstrate that pipeline quality natural gas was fired exclusively since the sulfur content of pipeline quality natural gas is regulated by the Federal Energy Regulatory Commission.

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 Director in a test plan, for approval by the Director. [PCC 17.12.045.D]



**Permit Issued To: Kalil Bottling Co,
Air Quality Permit # 251**

Part C: Applicable Regulations

Requirements Specifically Identified as Applicable:

Compliance with the terms contained in this permit shall be deemed compliance with the following federally applicable requirements in effect on the date of permit issuance:

Code of Federal regulations (CFR):

40 CFR Subpart Dc Standards of Performance for Performance Industrial Commercial-Institutional Steam Generating Units

EPA Determination Detail Control Number 0300118

Pima County State Implementation Plan (SIP):

Rule 343 Visibility Limiting Standard
Rule 344 Odor Limiting Standards (Section A)

Pima County Code (PCC) Title 17

Compliance with the terms contained in this permit shall be deemed compliance with the following non-federally applicable requirements in effect on the date of permit issuance:

17.12.045 Test methods and procedures
17.12.080 Permit display or posting
17.12.180 Permit Contents
17.12.190 Permit containing voluntary accepted emission limit and standards
17.12.220 Compliance plan; certification
17.12.320 Annual emission inventory questionnaire
17.12.350 Material permit condition

17.16.030 Odor Limiting Standards
17.16.040 Standards and applicability (Includes NESHAP)
17.16.050 Visibility limiting standard
17.16.130 New and Existing Stationary Source Performance Standards -Applicability
17.16.400 Organic solvents and other organic materials
17.16.490.A.12 Standards of performance for new stationary sources (NSPS)

17.20.010 Source Sampling, Monitoring, and Testing

**Permit Issued To: Kalil Bottling Co,
Air Quality Permit # 251**

Part D: Equipment List

TABLE 1: NSPS Small Industrial Commercial-Institutional Steam Generating Units (Natural Gas Fired)

Equipment Number	Item	Make	Model	Serial Number	Manufacturer Date	Capacity
AUX015	Steam Boiler	Miura	LX-300SG	48S47913	1998	12,400,000 Btu/hr

TABLE 2: Surface Coating (Paint Spraying) Equipment

Equipment Number	Item	Make	Model	Serial Number	Manufacturer Date	Capacity
Unspecified	Paint Spray Booth	Bleeker Bros	PS121010	Unspecified	Unspecified	N/A *

N/A Not applicable

* The reported over spray efficiency rating for the paint spray booth is 98% when using filters. (Ref: Kalil Bottling Co. letter dated March 22, 2005)

TABLE 3: Surface Coating (Paint Spraying) Equipment

Equipment Number	Item	Make	Model	Serial Number	Manufacturer Date
Unspecified	Airless Paint Gun	Sharpe HVLP	5815	Unspecified	Unspecified