

**PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY
Air Program**

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

ARIZONA CANNING COMPANY, LLC

**8755 SOUTH RITA ROAD
TUCSON, AZ 85747**

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

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

PDEQ PERMIT NUMBER 3221, PERMIT CLASS II

PERMIT ISSUED THIS 24th DAY OF APRIL, 2007

EXPIRATION DATE APRIL 23, 2012


SIGNATURE

Tina Gingras Air Program Manager, PDEQ
TITLE

**Arizona Canning Company, LLC
Air Quality Permit # 3221**

Summary

This operating permit is the first 5-year air quality permit issued to Arizona Canning Company, LCC., the Permittee. This facility is a new **Class II, True Minor, Stationary Source** for all pollutants.

The facility is a food (bean) canning plant that processes whole beans and refried beans.

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

Pollutant	Tons per Year
Nitrogen Oxides (NO _x)	88.49
Carbon Monoxide (CO)	50.91
Volatile Organic Compounds (VOC)	8.75
Particulate Matter (as PM ₁₀)	6.66
Sulfur Oxides (SO _x)	4.08
Hazardous Air Pollutants (HAPs) - Total	0.08

TABLE OF CONTENTS

Summary2

Specific Conditions4

 I. Applicability4

 II. Emission Limits and Standards4

 III. Monitoring Requirements5

 IV. Recordkeeping Requirements6

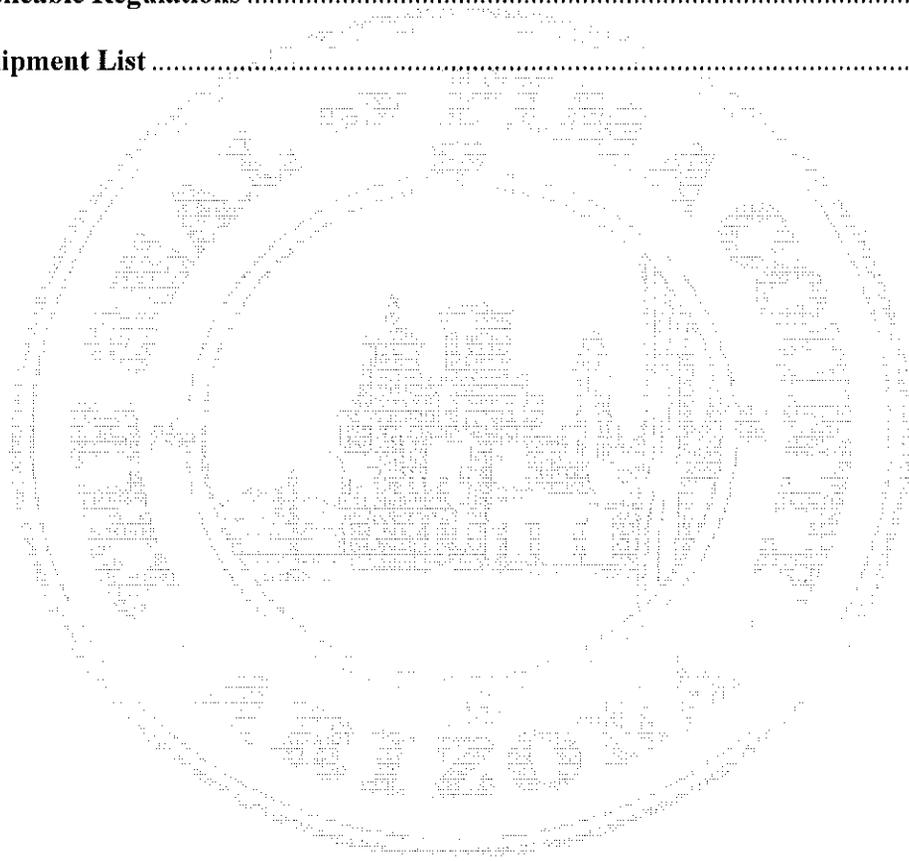
 V. Reporting Requirements7

 VI. Testing Requirements8

Additional Permit Requirements.....9

Attachment 1: Applicable Regulations10

Attachment 2: Equipment List11



**Permit Issued To: Arizona Canning Company, LLC.
Air Quality Permit # 3221**

SPECIFIC CONDITIONS

I. Applicability

This is a new Class II *true minor* stationary source for all pollutants. The facility operates a 425 brake horsepower emergency generator set and two boilers, with a capacity >10 million Btu/hour each. Both boilers are subject to the 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. Standards of Performance for Stationary Rotating Machinery.

II. Emission Limits & Standards:

A. NSPS Equipment

The provisions of this section are applicable to the Cleaver Brooks boilers identified in Table 1 of Attachment 2.

1. Opacity Standard

- a. The Permittee shall not cause, allow, or permit the effluent from a single point, multiple point, or fugitive emissions source to have an average opacity density equal to or greater than 20 percent, subject to the following provisions: [PCC 17.16.040.A]
 - i. Opacities (optical densities), as measured in accordance with Method 9, of an effluent shall be measured by a certified visible emissions evaluator with his/her natural eyes, approximately following the procedures which were used during his/her certification, or by an approved and precisely calibrated in-stack monitoring instrument. [PCC 17.16.040.A.1]
 - ii. A violation of an opacity standard shall be determined by measuring and recording a set of consecutive, instantaneous opacities, and calculating the arithmetic average of the measurements within the set unless otherwise noted herein. The measurements shall be made at approximately fifteen-second intervals for a period of at least six minutes, and the number of required measurements shall be 25. Sets need not be consecutive in time, and in no case shall two sets overlap. If the average opacity of the set of instantaneous measurements exceeds the maximum allowed by any rule, this shall constitute a violation. [PCC 17.16.040.A.2]
 - iii. The use of air or other gaseous diluents solely for the purpose of achieving compliance with an opacity standard is prohibited. [PCC 17.16.040.A.3]
- b. When the presence of uncombined water is the only reason for failure of a source to otherwise meet the requirements of this article, this article shall not apply.

2. Fuel Limitation

The Permittee shall combust only pipeline quality natural gas in the Clever Brooks Boilers. Pipeline quality natural gas shall mean natural gas that meets the requirements of the Federal Energy Regulatory Commission (FERC) approved Tariff agreement that limits the sulfur content of pipeline natural gas 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 17.12.185.A.2]

B. Stationary Rotating Machinery

The provisions of this section are applicable to the Kohler Co generator set identified in Table 2 of Attachment 2.

1. Opacity Standard

- a. 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]
- b. The Permittee shall not cause or permit the effluent from a single emission point, multiple emission point, or a fugitive emissions source 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 Method 9. [PCC 17.16.040]

2. Fuel Limitation

The Permittee shall only burn low sulfur diesel fuel. [PCC 17.12.185.A.2]

III. Monitoring Requirements [PCC 17.12.185.A.3]

A. NSPS Equipment

The provisions of this section are applicable to the Cleaver Brooks boilers identified in Table 1 of Attachment 2.

1. In order to demonstrate compliance with the opacity limitation in II.A.1 of this permit, the Permittee shall conduct a visible emissions check on the exhaust stack of the boiler at least quarterly when the boiler is in operation. For the purposes of this permit, a visible emission check is a verification that abnormal emissions are not present at the boiler stack.
2. The Permittee shall determine the total monthly amount of fuel combusted in each of the Cleaver Brooks boilers as follows: [40 CFR 60.48c(g)]
[Federally Enforceable Condition]
 - a. Determine the total natural gas consumed in the two Cleaver Brooks boilers (in Cubic Feet) for each month period by using the flow meter upstream of both boilers.
 - b. Determine the total natural gas consumption for one boiler in cubic feet per minute (CFM) for one hour at Low Fire. This volume of natural gas consumption shall be measured within 180 days of permit issuance directly from the flow meter upstream of the two Cleaver Brooks Boilers when only one boiler is firing.

- c. Determine the total natural gas consumption for the same boiler above in cubic feet per minute (CFM) for one hour at Full Fire. This volume of natural gas consumption shall be measured within 180 days of permit issuance directly from the flow meter upstream of the two Cleaver Brooks Boilers when only one boiler is firing.
 - d. Determine the total monthly amount of natural gas consumption at Low Fire for the boiler in III.A.1.b of the Specific Conditions by multiplying the Low Fire (CFM) consumption rate by the monthly operating time during Low Fire for that boiler.
 - e. Determine the total monthly amount of natural gas consumption at Full Fire for the boiler in III.A.1.b of the Specific Conditions by multiplying the Full Fire (CFM) consumption rate by the monthly operating time during Full Fire for that boiler.
 - f. Determination of the monthly natural gas consumption for the second boiler shall be made by subtracting the sum of the monthly consumption rates in III.A.1.d and III.A.1.e of the Specific Conditions from the total natural gas consumption rate determined in III.A.1.a.
3. The Permittee shall be considered in compliance with II.A.2 of the Specific Conditions by demonstrating that only commercially available pipeline quality natural gas was fired in the boilers listed. 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, showing that only commercial natural gas was purchased for use in the equipment.

B. Stationary Rotating Machinery

This provision is applicable to the Kohler Co generator set identified Table 2 of Attachment 2.

The Permittee shall conduct a visible emissions check on the exhaust stack of the generator at least quarterly when the generator is in operation. For the purposes of this permit, a visible emission check is a verification that abnormal emissions are not present at the generator stack.

IV. Recordkeeping Requirements

A. NSPS Equipment.

The provision of this section is applicable to the Cleaver Brooks Boilers identified in Table 1 of Attachment 2.

1. For the opacity emissions check required in II.A.1 of the Specific Conditions, 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 corrective action taken (if required).
2. The Permittee shall retain all records to determine the amount of natural gas burned in each of the Cleaver Brooks Boilers for a period of two years following the date of such record. [40 CFR 60.48c(i)]

[Federally Enforceable Condition]

B. Stationary Rotating Machinery

The provisions of this section are applicable to the Kohler Co generator set identified in Table 2, Attachment 2 of this permit.

1. For the visible emissions check required in II.B.1 of the Specific Conditions, 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 corrective action taken (if required).
2. In order to demonstrate compliance with the fuel limitation required in II.B.3 of the Specific Conditions, the Permittee shall maintain records of fuel supplier specifications which verify the sulfur content of the fuel, piped and/or as delivered.

V. Reporting Requirements

A. NSPS Equipment

The provisions of this section are applicable to the Cleaver Brooks boilers identified in Table 2 of Attachment 2.

1. Reporting requirements for the opacity checks and fuel limitation conditions are identified in the Additional Permit Requirements of this permit.
2. The Permittee shall have submitted 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 Conditions]
 - 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)]
 - b. The annual capacity factor at which the owner or operator anticipates operating the Cleaver Brooks boilers based on the fuel fired; [40 CFR §60.48c (a)(3)]

[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]

3. The Permittee shall annually submit to the Control Officer the reports required under IV.A of the Specific Conditions. [EPA DETERMINATION DETAIL CONTROL NUMBER 0300118]
4. The Permittee shall annually submit to the Control Officer the amount of natural gas burned in the Cleaver Brooks Boiler. [EPA DETERMINATION DETAIL CONTROL NUMBER 0300118]

B. Stationary Rotating Machinery

Reporting requirements identified in the Additional Permit Requirements of this permit.

VI. Testing Requirements - All operations

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 facility 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]

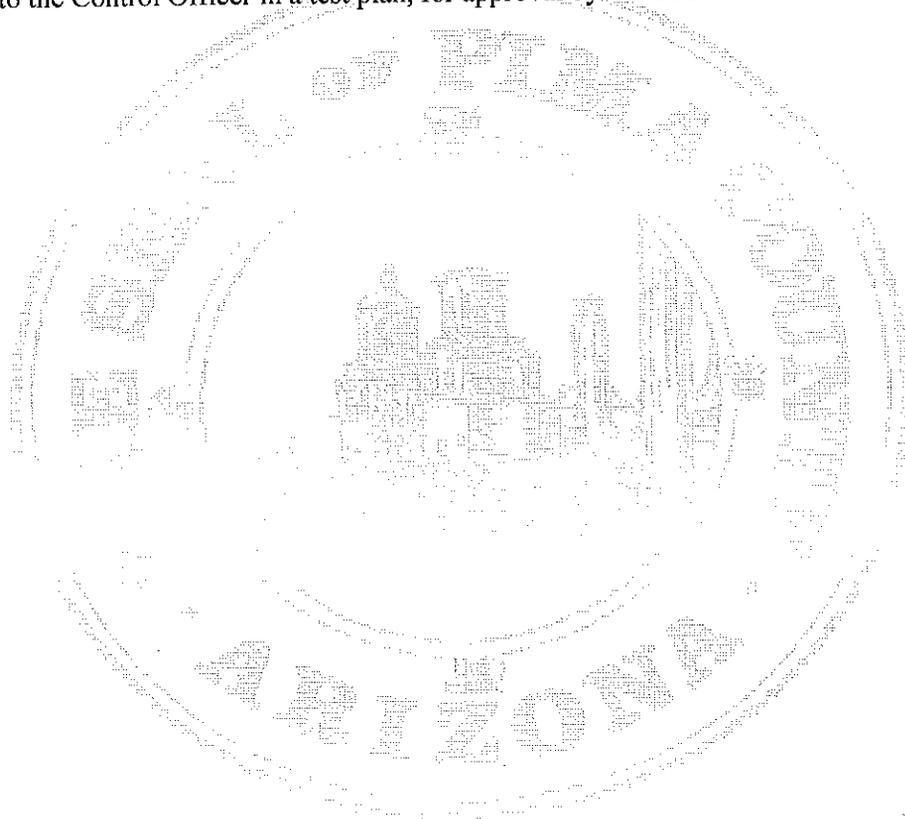
The Permittee shall use the following EPA approved reference test methods to conduct performance tests for the specified pollutants when required:

A. Opacity

When required, the Permittee shall perform EPA Method 9 visible emissions observations on the generator set to demonstrate compliance with the opacity standard.

B. 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]



ADDITIONAL PERMIT REQUIREMENTS

I. COMPLIANCE WITH PERMIT CONDITIONS

[PCC 17.12.185.A.7.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. 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 & 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 from 17.12.040.B. The number to report excess emissions is **520-740-3340**. The facsimile number is **520-882-7709**.
 2. Detailed written notification by submission of an excess emissions report within 72 hours of the notification under I.B.1 above. **Send to PDEQ 150 W. Congress St., 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 17.12.510. [PCC 17.12.185.A.9 & PCC 17.12.510]

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

[PCC 17.12.185.A.7.e]

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.

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Attachment 1: APPLICABLE REGULATIONS

Requirements Specifically Identified as Applicable:

Code of Federal regulations (CFR):

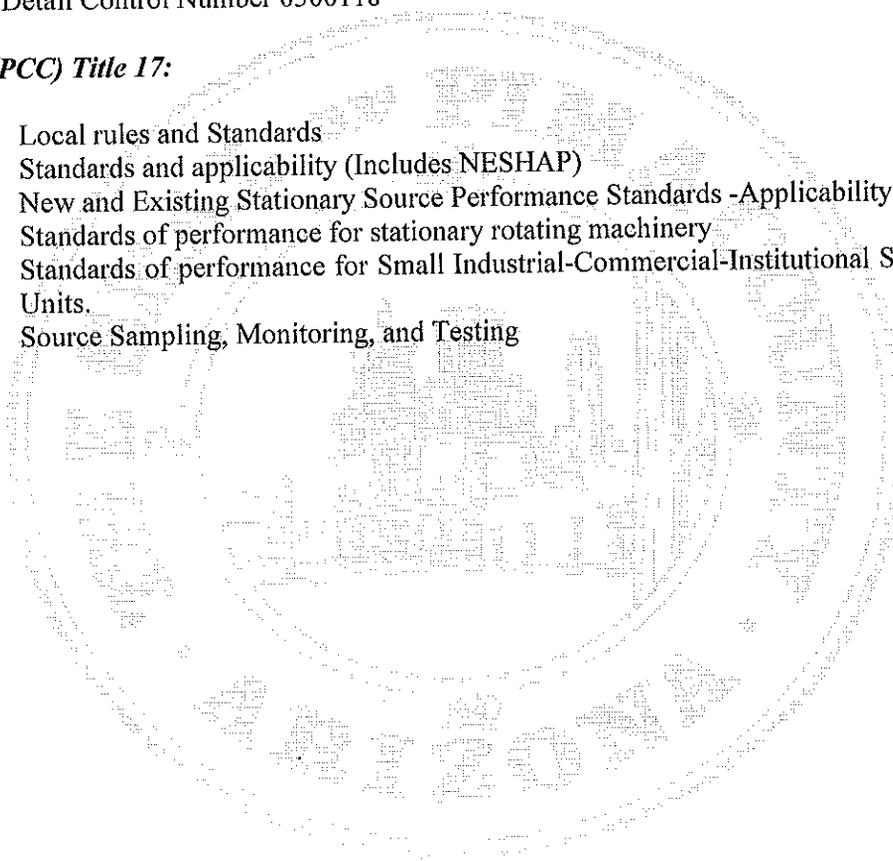
40 CFR Subpart Dc Standards of Performance for Small Industrial Commercial-Institutional Steam
Generating Units

Environment Protection Agency: Compliance Assistance, Clean Air Act Applicability Determination Index:

Determination Detail Control Number 0300118

Pima County Code (PCC) Title 17:

17.16.010 Local rules and Standards
17.16.040 Standards and applicability (Includes NESHAP)
17.16.130 New and Existing Stationary Source Performance Standards -Applicability
17.16.340 Standards of performance for stationary rotating machinery
17.16.490.A.12 Standards of performance for Small Industrial-Commercial-Institutional Steam Generating
Units.
17.20.010 Source Sampling, Monitoring, and Testing



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Attachment 2: Equipment List

TABLE 1: NSPS Small Industrial Commercial-Institutional-Steam Generating Units

Type of Equipment	Manufacture	Model	Serial Number	Date of Manufacturer	Capacity	Primary Fuel
Boiler	Cleaver Brooks	CB1-200-700 151	L101551	2001	29.29 MMBtu Max Input Capacity 700 hp	Natural Gas
Boiler	Cleaver Brooks	CB1-200-700 150	L101552	2001	29.29 MMBtu Max Input Capacity 700 hp	Natural Gas

TABLE 2: Standards of Performance for Stationary Rotating Machinery

Type of Equipment	Manufacture	Model	Serial Number	Date of Manufacturer	Capacity	Primary Fuel
Emergency Generator Set	Kohler Co	250REOZD	0717222	10/2001	265kW/331kVA 277/480 Volt 1800 RPM 425 Bhp	Diesel

