

**Imerys Marble
Air Quality Permit #667**

**Technical Support Document
January 2010**

I. General Comments:

A. Company Information

1. Imerys Marble, Inc
2. End of Santa Rita Road, Sahuarita

B. Background

The source is currently permitted and has been in operation prior to 1993. In July 2008 Imerys submitted a minor permit revision to add a product hopper conveyor not subject to NSPS, two hoppers and loadout spouts all subject to subject to New Source Performance Standards (NSPS). This technical support document addresses the minor revision only.

The table below summarizes the permit actions that have been submitted to PDEQ in the last permit term.

Date Received (Most Recent First)	Permit Action
December 10, 2009 (Update to Action ID 667-4P)	Update to October 2009 minor permit revision addressing equipment reconfiguration and removal of equipment.
October 08, 2009 (Action ID 667-4P)	Minor permit revision submittal
July 1, 2008 (Action ID 667-2P)	Minor permit revision submittal
May 9, 2007 (Action ID 667-1P)	Permit renewal application submittal

C. Attainment Classification

This source is located in a region that is in attainment for all criteria pollutants.

II. Source Description

Imerys Marble, Inc. operates crushing and screening equipment for processing of limestone materials mined on site. Processed materials are conveyed to product silos prior to being directed to their bagging operation or loaded into bulk trucks.

A. Process Description

This minor revision affects the two product hoppers and loadout spouts and one conveyor belt.

B. Air Pollution Control Equipment

None associated with this minor revision

III. Regulatory History

A. Testing & Inspections

The source is currently in compliance and has no outstanding compliance or enforcement actions.

B. Excess Emissions

None reported and none recorded.

IV. Emissions Estimates

Imerys increased the permitted emission levels of PM₁₀ from 10 to 17 tpy in 2008 to accommodate the additional equipment's PM₁₀ emissions. The PM₁₀ PTE increased to 20.5 tpy with the October 2009 minor permit revision. PDEQ will reevaluate the PTE during the current processing of the renewal permit.

Pollutant	Controlled Tons per Year
Nitrogen Oxides (NOx)	93.6
Carbon Monoxide (CO)	21.4
Volatile Organic Compounds (VOC)	2.7
Particulate Matter (as PM ₁₀)	20.5
Sulfur Oxides (SOx)	31.5
Lead	Negligible
Hazardous Air Pollutants (HAPs)	Negligible

V. Applicable Requirements

There are no new applicable requirements that the source is subject to. Imerys' is currently classified as a Class II source subject to NSPS Subpart OOO, therefore the NSPS requirements for the additional equipment have previously been incorporated in the permit. However, there have been updates to subpart OOO and those updates have been incorporated into the permit. As the permit is currently being renewed PDEQ will ensure that all new updates have been thoroughly updated.

Pima County Code Title 17, Chapter 17.16:

None additional

VI. Permit Contents

Revisions to NSPS Subpart OOO have been incorporated into the permit. A complete review of the NSPS will be carried out during the current renewal application in processing.

VII. IMPACTS TO AMBIENT AIR QUALITY

Not a major source thus no studies are required.

VIII. CONTROL TECHNOLOGY DETERMINATION

No control technologies needed to be determined.

IX. PREVIOUS PERMIT CONDITIONS

No previous permit conditions that need to be included in this permit revision.