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2026-26P



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DEPARTMENT OF
ENVIRONMENTAL QUALITY

November 26, 2013

Mr. Scott Porter
Air Quality Program
Pima County Department of Environmental Quality
33 N. Stone Ave., Suite 700
Tucson, AZ 85701

Re: Request for Minor Air Quality Permit Revision
ASARCO LLC—Mission Complex, Permit No. 2026

Dear Mr. Porter:

ASARCO LLC—Mission Complex (“Asarco”) is in the process of completing the South Mill Expansion previously permitted by the Pima County Department of Environmental Quality (“PDEQ”). As part of that project, Asarco recently installed a new dust collector on its lime silo. Based upon preliminary testing, Asarco has determined that the initial contractor’s estimate on required airflow was insufficient to control lime emissions. Asarco is therefore proposing to replace the current 500 cfm fan motor with one capable of moving up to 2000 cfm to ensure adequate capture of emissions from this transfer operation.

Asarco believes that the proposed substitution of the higher capacity fan will have a relatively insignificant impact on emissions, increasing the potential to emit from approximately 0.01 ton/year (South Mill Expansion permit) to 0.05 ton/year (proposed revision). Accordingly, Asarco is submitting a request for a minor permit revision/SIP Installation permit to authorize the increase in fan capacity.

Asarco believes that the proposed fan replacement activities at SSOPS-6 qualify for a minor permit revision for the following reasons:

- Improving the capture efficiency of the pollution control equipment does not violate any applicable requirement and will help minimize fugitive dust loss from this equipment.

- Replacement and addition of the pollution control equipment does not require any substantive change to existing monitoring, reporting or recordkeeping requirements in the permit. The new equipment is adequately addressed by the existing requirements.
- Replacement and addition of the pollution control equipment does not require or change a case-by-case determination of an emission limitation, other standard, or a source-specific determination of ambient impacts or visibility. The new fan motor replaces an existing fan motor with one of slightly higher capacity and will achieve the designed rate of fugitive emissions control.
- The replacement and addition of the pollution control equipment do not alter an emissions cap or federal alternative emissions limit. Instead, the units will comply with existing NSPS limits.
- The changes are not modifications under any provision of Title I. Only emissions controls are being replaced or upgraded, so there is no impact on underlying NSPS equipment that could lead to an NSPS modification. Similarly, the amount of emissions increase, if any, is well below PSD “significant” thresholds, both for this project and for the prior South Mill Expansion project, as demonstrated in the attached application materials.
- The proposed replacement and additional pollution control equipment is not a change in fuels.
- The proposed replacement and additional pollution control equipment will not cause a “significant” increase in air emissions. The estimated increase is from 0.01 to 0.05 tons/year.
- The proposed replacement and additional pollution control equipment is not required to be processed as a “significant” permit revision by PCC 17.12.260.

PCC 17.12.255.A. Asarco therefore believes that a minor permit revision satisfies both the Pima County Code and Pima County SIP provisions and requests that PDEQ issue the requested permit revision as soon as possible. Because the higher capacity fan is needed to achieve intended fugitive control, Asarco will proceed to install the new fan as expeditiously as possible pursuant to PCC 17.12.255.G. No change is required to Asarco’s permit except a new line in Part C, a draft of which is attached.

Asarco requests that minor permit processing procedures be used on this application. A copy of the standard permit application form and supporting emissions calculations is attached. Please contact Jamie Ekholm at 520-393-4671 if you have any questions or concerns or if you believe there is any reason Asarco should not expeditiously order and install the higher capacity fan for this capture system.

I certify that the proposed revision meets the criteria for use of minor permit revision procedures and that the information contained in this document and all attachments is true, accurate, and complete to the best of my knowledge after reasonable inquiry of those who prepare them.

Sincerely,

Tom Phillips
General Manager

Enclosures

ATTACHMENT “A”
Standard Permit Application

PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY
Air Program
33 N. Stone Avenue • Suite 700 • Tucson, AZ 85701 • Phone: (520) 243-7400

STANDARD PERMIT APPLICATION FORM FOR CLASS I SOURCES

(As required by A.R.S. § 49-480, and Title 17 of the Pima County Code)

1. Permit to be issued to (Arizona Corporate Commission Registered Name): ASARCO LLC
2. Mailing Address: 4201 West Pima Mine Road
City: Sahuarita State: AZ ZIP: 85629
3. Plant Name (if different than item #1): ASARCO LLC - Mission Complex
4. Name (or names) of Owner or Operator: ASARCO LLC - Mission Complex
FAX #: (520) 625-0802 Phone: (520) 648-2500
Email: NA
5. Name of Owner's Agent: Tom Phillips, General Manager
FAX #: (520) 625-9632 Phone: (520) 648-4528
6. Plant/Site Manager/Contact Person: Jamie Ekholm, Environmental Engineer
FAX #: (520) 648-0802 Phone: (520) 393-4671
Email: jekholm@asarco.com
7. Proposed Equipment/Plant Location Address: 4201 W. Pima Mine Rd.
City: Sahuarita State: AZ ZIP: 85269
Indian Reservation (if applicable): No T/R/S, Lat/Long, Elev: 31 58' 39.79"N, 111 3' 36.82" W, 3302 ft
8. General Nature of Business: Copper mining and concentrating
Standard Industrial Classification Code: 1021 State Permit Class: Class 1
9. Type of Organization: Corporation Individual Owner Partnership Government Entity Other LLC
10. Permit Application Basis (Check all that apply): New Source General Permit
 Renewal Revision: Administrative Minor Significant Existing Permit # 2026
Date of Commencement of Construction or Modification: as soon as possible
Is any of the equipment to be leased to another individual or entity? Yes No
11. Signature of Responsible Official of Organization: 
Official Title of Signer: General Manager, Mission Complex
12. Typed or Printed Name & E-mail of Signer: Tom Phillips TPhillips@asarco.com
Date: 11-21-13 Telephone Number: (520) 648-4528

EMISSION SOURCES

COMPANY NAME ASARCO LLC - Mission Complex

PAGE 1 OF 1
DATE 11/26/2013

Estimated "Potential to Emit" per 17.04.340.A.164.
Review of applications and issuance of permits will be expedited by supplying all necessary information on this Table.

REGULATED AIR POLLUTANT DATA			EMISSION POINT DISCHARGE PARAMETERS												
EMISSION POINT [1]	CHEMICAL COMPOSITION OF TOTAL STREAM	REG. AIR POLLUTANT EMISSION RATE	UTM COORDINATES OF EMISSION POINT [5]			STACK SOURCES [6]			NONPOINT SOURCES [7]						
			REGULATED AIR POLLUTANT NAME [2]	#/ HR. [3]	TONS/ YEAR [4]	ZONE	EAST (Mtrs)	NORTH (Mtrs)		HEIGHT ABOVE GROUND (ft)	HEIGHT ABOVE STRUC. (ft)	DIA. (ft)	VEL (fps)	TEMP. (°F)	LENGTH (ft)
SSOPS-6	South Mill Lime Bin Dust Collector	PM/PM10	0.05	0.23											

GROUND ELEVATION OF FACILITY ABOVE MEAN SEA LEVEL _____ feet. PDEQ STANDARD CONDITIONS ARE 293K AND 101.3 KILOPASCALS (17.04.340.A.210)

General Instructions:

- Identify each emission point with a unique number for this plant site, consistent with emission point identification used on plot plan, previous permits, and Emissions Inventory Questionnaire. Include fugitive emissions. Limit emission point number to eight (8) character spaces. For each emission point use as many lines as necessary to list regulated air pollutant data. Typical emission point names are: heater, vent, boiler, tank, reactor, separator, baghouse, fugitive, etc. Abbreviations are O.K.
- Components to be listed include regulated air pollutants as defined in 17.04.340.A.182. Examples of typical component names are: Carbon Monoxide (CO), Nitrogen Oxides (NO_x), Sulfur Dioxide (SO₂), Volatile Organic Compounds (VOC), particulate matter (PM), particulate less than 10 microns (PM₁₀), etc. Abbreviations are O.K.
- Pounds per hour (#/HR) is maximum potential emission rate expected by applicant.
- Tons per year is annual maximum potential emission expected by applicant, which takes into account process operating schedule.
- As a minimum applicant shall furnish a facility plot plan as described in the filing instructions. UTM coordinates are required only if the source is a major source or is required to perform refined modeling for the purposes of demonstrating compliance with ambient air quality guidelines.
- Supply additional information as follows if appropriate:
 - Stack exit configuration other than a round vertical stack. Show length and width for a rectangular stack. Indicate if horizontal discharge with a note.
 - Stack's height above supporting or adjacent structures if structure is within 3 times the "stack height above the ground" of stack.
- Dimensions of nonpoint sources as defined in 17.04.34-A.147.

Certification of Compliance with all Applicable Requirements

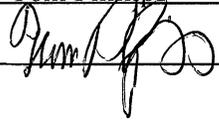
Permit Number (If existing source) 2026

This certification must be signed by a Responsible Official. Applications without a signed certification will be deemed incomplete.

The responsible official is defined as a person who is in charge of principal business functions or who performs policy or decision making functions for the business. This may also include an authorized representative for such persons. For a complete definition, see Pima County Air Quality Control, Title 17, Section 17.04.340(A)(186).

I certify that I have knowledge of the facts herein set forth, that the same are true, accurate and complete to the best of my knowledge and belief, and that all information not identified by me as confidential in nature shall be treated by the Pima County Department of Environmental Quality (PDEQ) as public record. I also attest that I am in compliance with the applicable requirements and will continue to comply with such requirements and any future requirements that become effective during the life of my permit. I will present a certification of compliance to PDEQ no less than annually and more frequently if specified by PDEQ. I further state that I will assume responsibility for the construction, modification, or operation of the source in accordance with the requirements of Title 17 of the Pima County Code and any permit issued thereof.

Name (Print/Type): Tom Phillips Title: General Manager

(Signature):  Date: 11-27-13

Certification of Truth, Accuracy, and Completeness

17.12.160(H) - Certification of Truth, Accuracy, and Completeness. Any application form, report, or compliance certification submitted pursuant to this Chapter shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate, and complete.

By my signature I,(Name) Tom Phillips, hereby certify that based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Signature of Responsible Official of Organization: 

Title: General Manager Date: 11-22-13

Fee Summary for Class I Sources - Revised December 20, 2007	
Application Processing Fee \$105.80 [#] per hour (Minimum One Hour – No Maximum)	Accelerated Permit Application Fee \$15,000*
Class I Source Category	Administrative Fee
Aerospace	\$15,570
Cement Plants	\$47,680
Combustion/Boilers	\$11,590
Compressor Stations	\$9,530
Electronics	\$15,340
Expandable Foam	\$10,990
Foundries	\$14,610
Landfills	\$11,940
Lime Plants	\$44,660
Copper and Nickel Mines	\$11,220
Gold Mines	\$11,220
Mobile Home Manufacturing	\$11,110
Paper Mills	\$15,330
Paper Coaters	\$11,590
Petroleum Products Terminal Facilities	\$17,020
Polymeric Fabric Coaters	\$15,330
Reinforced Plastics	\$11,590
Semiconductor Fabrication	\$20,170
Copper Smelters	\$47,680
Utilities - Natural Gas	\$12,310
Utilities - Fossil Fuel Except Natural Gas	\$24,380
Vitamin/Pharmaceutical Manufacturing	\$11,830
Wood Furniture	\$11,590
Others	\$11,940
Others with Continuous Emissions Monitoring	\$15,340
Emission Based Fee/ Ton of regulated pollutants	\$14.18[#]

* Fee due 60 days prior to submitting application with letter requesting accelerated processing (No exceptions)

[#] Adjusted every November 1 based on the Consumer Price Index for urban consumers published by the US Dept. of Labor. Information is taken from Pima County Code Title 17 Section 17.12.510. Refer to this section for more complete information.

ATTACHMENT “B” Emissions Calculations

Emissions Calculations for Increased Fan Capacity on Lime Silo, START HERE

The existing Lime Silo baghouse has a motor sized to deliver 500 cfm at an emission rate of 0.003 gr/scf. The new fan motor is sized to deliver 2000 cfm at an emission rate of 0.003 gr/scf. Only particulate emissions are expected. The potential to emit of this unit is as follows:

$$\begin{aligned} 0.003 \text{ gr/dscf} * 2000 \text{ dscf/min} * 60 \text{ min/1 hr} * 1 \text{ lb/7000 gr} &= 0.05 \text{ lb/hr} \\ 0.05 \text{ lb/hr} * 8760 \text{ hr/year} * 1 \text{ ton/2000 lbs} &= 0.23 \text{ tpy} \end{aligned}$$

This represents an increase of 0.17 tpy over the existing 500 cfm fan motor.

The unit is not subject to NSPS Subpart LL because it serves the lime plant and not the metallic mineral processing plant.

Based on this calculation, it is clear that the proposed replacement does not trigger PSD review because the total emissions of the project are less than 1 tons/year even without accounting for past emissions. Similarly, the South Mill Expansion project (where this unit was first introduced) had an emissions reduction. Therefore, the former South Mill Expansion project, even if this project is included, would not have triggered PSD.

Attachment “C”

Revised Equipment List

Table 5 Lime Handling

Name (Equipment ID)	Emission Point	Type	Make	Model	Serial Number	Date of Manufacture	Design Capacity	NSPS Applicable
Mission Mill Lime Bin Collector (328-E6)	SSOPM-17	Baghouse, Dry	Mikro-Pulsaire	16S-8-30B	992020H1	1999	3 HP, 1500 CFM	N
South Mill Lime Bin Dust Collector (60-502)	SSOPS-6	Baghouse, dry, Pulsed Air	Mikro-Pulsaire	36S-8-30	72H2304	2/15/73	25 HP, 3,000 ACFM	N
South Mill Lime Bin Dust Collector (60-502)*	SSOPS-6	Dry Dust Collector	FARR	FBB-634	FBB-85479001	FBB-10/7/13	FBB-7.5 HP, 2500 ACFM Varies, only runs on 8 hour day, intermittent feed	N
Mission Mill Lime Feeder Conveyor (HFOPM-5)		Dry lime handling, 36 inch X 55 foot belt	N/A	N/A	N/A	1960	Varies, only runs on 8 hour day, intermittent feed	N
Mission Mill Lime Feed to Bucket Elevator Conveyor (328- E3)		24 inch X 32 foot belt	N/A	N/A	N/A	1960	Varies, only runs on 8 hour day, intermittent feed	N
Mission Mill REX Bucket Elevator (328-E9)		Lime	Chain Belt Company	N/A	N/A	Approx. 1960	Varies, only runs on 8 hour day, intermittent feed 0-8 tons/hour	N
Mission Mill Lime Feed Conveyor (328-E11)		20 inches X 37 foot belt	N/A	N/A	N/A	Approx. 1960	0-8 Tons/hour, Varies, Intermittent feed	N
Mission Mill Lime Hopper		Lime	N/A	N/A	N/A	Approx. 1960	40tons	N
Mission Mill Lime Feeder (328-E44)	SSOPM-18	F33D1, style 018551	Syntron	C-54490	112501	Approx. 1960	0-8 tons/hour, Varies, Intermittent feed	N
Mission Mill Dry Lime Bin		Dry Lime	N/A	N/A	N/A	Approx. 1960	Approx. 250 tons	N