

Accommodated in
2026-26P



November 12, 2013

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

RECEIVED BY
PIMA COUNTY

NOV 22 2013

DEPARTMENT OF
ENVIRONMENTAL QUALITY

Re: Notification of Equipment Change Without a Permit Revision
ASARCO LLC—Mission Complex, Permit No. 2026

Dear Mr. Porter:

ASARCO LLC—Mission Complex (“Asarco”) hereby submits this Notification of Equipment Change Without Permit Revision to the Pima County Department of Environmental Quality pursuant to its Air Quality Permit No. 2026, Part “A”, Condition XVI, and Pima County Code (PCC) section 17.12.230. Asarco proposes to replace the existing in-line spare drive for the M307-E13 Feed Conveyor at the Mission Secondary/Tertiary Crusher installation with a new drive matching the horsepower rating of the existing primary drive, which is greater than the existing spare’s horsepower rating.

Pursuant to PCC 17.12.230.B, substitution of a piece of process equipment with an identical or substantially similar unit can be accomplished as a change without permit revision. Asarco believes that the proposed replacement activity does not require a permit revision for the following reasons:

- The change is not a modification under any provision of Title I or A.R.S. § 49-401.01(24). The replacement unit is an in-line spare identical to the primary unit. It only operates when the primary unit is down. The current spare has operated rarely. Routine maintenance on both the primary and spare units is accomplished during crusher down time, which far exceeds the time necessary to maintain these units. Therefore, no increase in throughput or emissions is anticipated;

- Replacement of the spare drive unit does not exceed the emissions allowable under the permit as there will be no change in emissions because the spare and primary unit have the same horsepower rating and throughput is not changed;
- Replacement of the pollution control unit does not violate any applicable requirement or trigger any additional applicable requirement;
- The replacement otherwise satisfies all requirements for a minor permit revision under Section 17.12.255:
 - Replacement of the spare 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 piece of equipment is merely replacement of an existing on-line spare. The new unit has the same capability as the existing primary unit.
 - The replacement of the spare unit does not alter an emissions cap or federal alternative emissions limit.
 - The proposed replacement of the spare unit is not a change in fuels.
- Replacement of the spare unit does not require any substantive change to existing monitoring, reporting, recordkeeping or compliance certification requirements in the permit. The replacement unit is adequately addressed by the existing requirements.

Permit 2026, Part “A”, Condition XVI; PCC 17.12.230.A.

Asarco is providing this notice more than 7 days in advance. PCC 17.12.230.D. Additional information is provided as follows:

1. When the proposed change will occur. Asarco will make the change upon receipt of written approval from PDEQ, but no earlier than seven days after the date of delivery to PDEQ and EPA.
2. Asarco will replace the existing on-line spare for the M307-E13 conveyor with a new unit that is the same size and capability of the existing primary unit. The existing spare is slightly smaller.
3. Any change in emissions of regulated air pollutants. Because the spare only operates when the primary unit does not, and has either not operated or operated rarely, Asarco anticipates no change in emissions as a result of this replacement of the in-line spare.
4. The pollutants emitted subject to the emissions trade, if any. Not applicable as no trade is intended. Particulate matter is the sole pollutant from this unit.
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. Not applicable, this is not a

trade. It is an equipment replacement authorized by PCC 17.12.230 and Permit 2026, Part "A", Condition XVI.

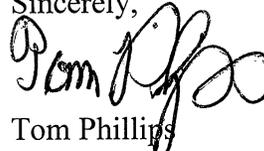
6. If the emissions trading provisions of the implementation plan are invoked, then the permit requirements with which the source will comply. Not applicable. The in-line spare will comply with all requirements of the existing permit without change or alteration.
7. Any permit term or condition that is no longer applicable as a result of the change. Not applicable.

Asarco requests written confirmation from PDEQ that it concurs with the replacement of the existing in-line spare unit.

Please contact Jamie Ekholm at 520-393-4671 if you have any questions or concerns.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Phillips", written in a cursive style.

Tom Phillips
General Manager