

**PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR PROGRAM**

33 N. Stone Avenue, Suite 700 • Tucson, AZ 85701 • Phone (520) 243-7400

AIR QUALITY OPERATING PERMIT

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

**WESTIN LA PALOMA RESORT & SPA
3800 E. SUNRISE DRIVE
TUCSON, AZ 85718**

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

THIS PERMIT ISSUED SUBJECT TO THE SPECIFIC AND GENERAL CONDITIONS
IDENTIFIED IN THIS PERMIT

PERMIT NUMBER 2655

PERMIT CLASS III

ISSUED: October xx, 2015

EXPIRES: October xx, 2020

SIGNATURE

Rupesh Patel, Air Permit Manager, PDEO

TITLE

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Proposed Permit

PERMIT SUMMARY

Westin La Paloma Resort & Spa, the Permittee operates a resort and spa facility located at 3800 E. Sunrise Drive, Tucson, AZ. The facility operates under the following industrial classification: Hotels – SIC code 7011 (NAICS 721110)

The Permittee currently operates 1 emergency generator, and 6 boilers in support of its operations.

The boilers are natural gas fired units.

The Permittee operates one emergency generator (335 hp). The permit limits the emergency generator to operate no more than 100 hours per year for maintenance and testing and emergency demand response. The facility is a commercial facility and therefore the generator is exempt from NESHAP, ZZZZ requirements in accordance with 40 CFR 63.6585(f)(2).

The facility is Class III, true minor source and an area source of HAPS. The facility is located in an area that is designated as attainment for all pollutants.

The following table summarizes the potential to emit of the source with limitations. These emission values are taken from the information contained in the renewal application and from standard emission factors in AP-42 Sections 1.3, 3.3, and 3.4. The emission values are for information purposes only and are not intended to be enforceable limits.

Facility-Wide Potential Emissions of Pollutants ¹ (tons/yr)										
Conventional or Criteria Air Pollutant								NSPS	HAPs	
PM _{2.5}	PM ₁₀	PM	NO _x	VOC	CO	SO ₂	Lead	N/A	Total	Single
0.34	0.14	0.45	5.86	0.34	4.59	0.15	ND ²	N/A	0.10	< 0.10

¹ Emergency generator engine PTE is calculated on limited operation as an emergency generator (100 hour/year).
Boiler PTE is calculated on unlimited operation firing natural gas.

² No Data. These emissions are insignificant

SPECIFIC CONDITIONS

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

SECTION 1

GENERAL APPLICABILITY

I. Statutory Authority

The Specific and General Conditions contained in this air quality operating permit apply to the operations, equipment, and sources provided in the permit application and shall not relieve the Permittee or its subcontractors from compliance with all local, county, state, and federal laws, statutes, and codes or from obtaining permits for other operations or activities when required. [PCC 17.12.010.D & PCC 17.12.165]

II. Permitted Facility Sources

The Specific Conditions apply to the following source categories, affected facilities, equipment, emission sources, installations, activities and operations at the facility. Section 5 of this permit contains the specific conditions related to the applicability of facility sources.

- A. Facility-Wide Operations
- B. Fossil Fuel Fired Industrial and Commercial Equipment (Boilers and Heaters)
- C. Non-NSPS / Non-NESHAP Generators

III. Permit Sections

The Specific Conditions have been organized into the following permit sections:

Section 1 - General Applicability (This Section)

Section 2 - Facility-Wide Operations

Section 3 - Fossil Fuel Fired Industrial and Commercial Equipment (Boilers, Heaters, & Other Equipment)

Section 4 - Non-NSPS / Non-NESHAP Generators

Section 5 - Specific Applicability Provisions

Section 6 - Fugitive "Dust Control Plan

IV. Applicability of More Than one standard

If more than one emission limit or emission standard in this permit is applicable to the same source, the more stringent standard or emission limit shall apply. [PCC 17.16.010.B]

[Locally Enforceable Condition]

SECTION 2

FACILITY-WIDE OPERATIONS

In accordance with I.A of Section 5, the provisions of this Section apply to facility-wide operations and all sources of air contaminants. All provisions in this Section are locally enforceable unless otherwise noted.

[PCC 17.16.010.B]

I. EMISSION LIMITS AND STANDARDS

A. Operating Restrictions

To avoid federal or other applicable requirements the Permittee shall comply with the operating limitations in I.A of Sections 3 and 4 of this permit.

[PCC 17.12.350.A.3.a]

[Material Permit Conditions]

B. General Control Standards

1. The Permittee shall not cause or permit the planning, construction, installation, erection, modification, use or operation of an emission source which will cause or contribute to a violation of a performance standard in Title 17 of the Pima County Code. [PCC 17.12.020 & PCC 17.16.020.A]

2. The Permittee shall keep complete records of the materials used as fuel for any stationary or portable source of air pollution which burns any material except natural gas. [PCC 17.16.010.C]

3. The Permittee is prohibited from firing high sulfur oil in any stationary or portable source without submitting a revision, as provided in V. of this Section, demonstrating to the satisfaction of the Control Officer, both that sufficient quantities of low sulfur oil are not available for use by the Permittee, and that the Permittee has adequate facilities and contingency plans to ensure that the sulfur dioxide ambient air quality standards will not be violated. For purposes of this paragraph "high sulfur oil" means oil containing 0.90 percent or more by weight of sulfur. Notwithstanding the prohibition to use high sulfur oil, the Specific Conditions contained in this permit may prescribe lower fuel sulfur limits for specific stationary or portable sources.

[PCC 17.12.185.A.2]

[Federally Enforceable Condition]

4. Where a stack, vent or other outlet is at such a level that fumes, gas mist, odor, smoke, vapor or any combination thereof constituting air pollution are discharged to adjoining property, the Control Officer may require the installation of abatement equipment or the alteration of such stack, vent or other outlet by the owner or operator thereof to a degree that will adequately reduce or eliminate the discharge of air pollution to adjoining property. [PCC 17.16.020.B]

C. Materials Handling Standards

1. The Permittee shall not transport or store VOC's without taking necessary and feasible measures to control evaporation, leakage, or other discharge into the atmosphere. [PCC 17.16.400.A]

2. Materials including solvents or other volatile compounds, paints, acids, alkalies, pesticides, fertilizers and manure shall be processed, stored, used and transported in such a manner and by such means that they will not evaporate, leak, escape or be otherwise discharged into the ambient air so as to cause or contribute to air pollution. Where means are available to reduce effectively the contribution to air pollution from evaporation, leakage or discharge, the installation and use of such control methods, devices, or equipment shall be mandatory. [PCC 17.16.430.F]

D. Odor Limiting Standard

The Permittee shall not emit gaseous or odorous materials from equipment, operations or premises under his control in such quantities or concentrations as to cause air pollution. [PCC 17.16.030]

E. Opacity Standards

Except as otherwise specified in the Specific Conditions of this permit and the Table in Attachment 4, the opacity of all plumes and effluents from all point, non-point, or fugitive emission sources shall not exceed 20% as determined by EPA Reference Method 9, Appendix A, 40 CFR Part 60.

[PCC 17.12.140.C.3, PCC 17.16.040, PCC 17.16.050.B, & PCC 17.16.130.B.1]

[This condition is Federally Enforceable when opacity is above 40%]

1. Opacities (optical densities), as measured in accordance with Method 9, of an effluent shall be measured by a certified visible emissions evaluator with his natural eyes, approximately following the procedures which were used during his certification, or by an approved and precisely calibrated in-stack monitoring instrument. [PCC 17.16.040.A.1]
2. 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 in this permit. 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 as specified in Attachment 4. 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]
3. 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]
4. When the presence of uncombined water is the only reason for failure of a source to otherwise meet the requirements of I.E and I.F of this Section, I.E and I.F of this Section shall not apply. [PCC 17.16.040.B]

F. Visibility Limiting Standard

[PCC 17.16.050]

1. The Permittee shall not cause, suffer, allow or permit operations or activities likely to result in excessive amounts of airborne dust without taking reasonable precautions to prevent excessive amounts of particulate matter from becoming airborne in accordance with the fugitive dust control plan in Section 5 of this permit.
2. The Permittee shall not cause, suffer, allow, or permit diffusion of visible emissions, including fugitive dust, beyond the property boundary line within which the emissions become airborne, without taking reasonably necessary and feasible precautions to control generation of airborne particulate matter in accordance with the fugitive dust control plan in Section 5 of this Permit. Sources may be required to cease temporarily the activity or operation which is causing or contributing to the emissions until reasonably necessary and feasible precautions are taken.
 - a. I.F.2 of this Section shall not apply when wind speeds exceed twenty-five (25) miles per hour (using the Beaufort Scale of Wind-Speed Equivalents, or as recorded by the National Weather Service). This exception does not apply if control measures have not been taken or were not commensurate with the size or scope of the emission source.
 - b. I.F.2 of this Section shall not apply to the generation of airborne particulate matter from undisturbed land.

G. Asbestos Requirements for Demolition and Renovation Activities

The Permittee shall not allow or commence demolition or renovation of any NESHAP facility, as defined in 40 CFR Part 61, Subpart M, National Emission Standards for Hazardous Air Pollutants – Asbestos, without first obtaining an activity permit from the Control Officer. Should this stationary source, pursuant to 40 CFR Part 61, Subpart M, become subject to asbestos regulations when conducting any renovation or demolition at this premises, then the Permittee or operator shall submit proper notification as described in 40 CFR Part 61, Subpart M and shall comply with all other applicable requirements of Subpart M. The Permittee shall keep a record of all relevant paperwork on file. [PCC 17.12.475.A & 40 CFR 61, Subpart M]

II. MONITORING REQUIREMENTS

[PCC 17.12.185.A.3]

A. Visible Emissions (VE)

If at any time, or while conducting an opacity check required by the Specific Conditions of this permit, the Permittee sees any plume or effluent from a facility source, that on an instantaneous basis, appears to exceed the opacity limit, or diffuse beyond the property boundary line, the Permittee shall investigate the source of the emissions and take corrective action, if required. If the plume persists or the activity or operation which is causing or contributing to the emissions cannot be corrected or halted, the Permittee shall, when practicable, make a visual determination of the opacity in accordance with I.E of this Section. If the VE determination exceeds the applicable opacity limit, or the emissions diffuse beyond the property boundary line, the Permittee shall report this as an excess emission in accordance with IV.A of this Section. [PCC 17.16.040]

B. Additional Monitoring Requirement

Except as otherwise contained in the Specific Conditions of this permit, additional monitoring for compliance with the facility-wide standards in I.A through G of this Section shall not be necessary. The Control Officer may require the Permittee to conduct additional monitoring if the Control Officer has reasonable cause to believe a violation of the standards has been committed.

III. RECORDKEEPING REQUIREMENTS

A. Monitoring Records

The Permittee shall maintain records of required monitoring information. Records shall include at a minimum: [PCC 17.12.184.A.4.a]

1. The date, time, and the place defined in the permit requiring the measurement, sampling, inspection, or observation;
2. The name of the person conducting the measurement, sampling, inspection or observation;
3. The particular piece of equipment, process, or area being measured, sampled, inspected or observed including a description of the operating conditions and monitoring techniques or methods used as applicable; and,
4. The results of the measurement, sampling, inspection or observation including any discrepancy or excess emissions. If there are any monitoring discrepancies or excess emissions, the record shall include the corrective action taken.

B. Record Retention

[PCC 17.12.185.4.b]

The Permittee shall retain records of all required monitoring and support information for at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, and copies of all reports required by the permit.

C. Recordkeeping for Compliance Determinations

The Permittee shall retain a copy of the permit onsite including all required monitoring records and support information for review by the Control Officer. In addition, all equipment identified in the permit equipment list shall be marked with a unique, clearly visible, and accessible ID to identify the piece of equipment. The Permittee shall be considered in compliance by demonstrating that sufficient information on the equipment and facility operations is periodically collected, recorded, and maintained to assure that the compliance status of any specific condition of this permit can be readily ascertained at any time.

[PCC 17.12.080, & PCC 17.24.020.A]

IV. REPORTING REQUIREMENTS

[PCC 17.12.185.A.5]

A. Excess Emissions Reporting

The Permittee shall report to the Control Officer any emissions in excess of the limits established by this permit in accordance with I.B of the General Conditions.

[PCC 17.12.040]

B. Emissions Inventory Reporting:

[PCC 17.12.320]

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 request and inventory form available, whichever occurs later, and shall include emission information for the previous calendar year. 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.

C. Certification of Truth Accuracy and Completeness

[PCC 17.12.165.H]

All reports required by this permit shall contain certification by a responsible official of truth, accuracy and completeness. The certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

V. FACILITY CHANGES

A. Permit Revision Application

Before installing additional emission sources, modifying existing emission sources, switching fuels, or changing the method of operation at the facility such that the changes increase actual emissions more than 10% of the major source threshold for any conventional pollutant, the Permittee shall, if applicable, apply for the appropriate revision in accordance with PCC 17.12.235, PCC 17.12.255, or PCC 17.12.260.

[PCC 17.12.240.C.3, PCC 17.12.235, PCC 17.12.255, PCC 17.12.260]

B. Notification

For facility changes that do not require revision, the Permittee may make the changes if written notice is provided to the Control Officer in advance of the changes in accordance with PCC 17.12.240.C

[PCC 17.12.240.C]

C. Recordkeeping Log

The Permittee shall maintain a log of other facility changes that do not require revision or notice in accordance with PCC 17.12.240.B. [PCC17.12.240.B]

VI. TESTING REQUIREMENTS

[PCC 17.12.045, PCC 17.12.050 & PCC 17.20.010]

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 source would have been in compliance with applicable federal requirements if the appropriate performance or compliance procedures or methods had been performed. Unless otherwise noted, the following test methods and standards are from 40 CFR Part 60, Appendix A or incorporated by reference in 40 CFR §60.17.

- A. When required, EPA Test Method 9 shall be used to monitor compliance with the opacity standards identified in this Permit. [PCC 17.12.045.B]
- B. When required, 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.
- C. Documentation, such as invoices or statements from the fuel supplier, showing that the fuel sulfur content is below the applicable standards shall be an acceptable means to demonstrate compliance with fuel sulfur limitations identified in this Permit. If otherwise required or when requested by the Control Officer, the fuel sulfur content of fuels shall be determined using ASTM D-129-91 or an equivalent for liquid fuels, and ASTM D0172-90 or an equivalent for gaseous fuels.
- D. Except as provided in this Section, should the Permittee desire to test or be required to test to demonstrate compliance with the standards contained in this permit, the Permittee shall contact the Control Officer for test methods and guidelines.

SECTION 3

FOSSIL FUEL FIRED INDUSTRIAL AND COMMERCIAL EQUIPMENT (BOILERS, HEATERS, AND OTHER EQUIPMENT)

In accordance with I.B of Section 5 of this permit, the provisions of this Section are applicable to boilers, heaters, and other fuel fired equipment identified on the equipment list in Table 1 of Attachment 2. In addition to the following provisions, the general provisions of 40 CFR Parts 60 and 63, Subpart A apply to affected boilers as applicable. All Provisions of this section are locally enforceable unless otherwise noted.

I. EMISSION LIMITATIONS AND STANDARDS

[PCC 17.12.185.A.2]

A. Fuel Limitations

The Permittee shall burn only the following fuels in each boiler, heater, or other fuel fired equipment listed in Table 1 of Attachment 2, subject to the following limitations:

[PCC 17.12.350.A.3.a)]

[Material Permit Conditions]

1. Natural Gas

There are no operating hours or fuel limitations for equipment, boilers or heaters when burning natural gas. For the purpose of this permit, *Natural gas* means: A naturally occurring mixture of hydrocarbon and non-hydrocarbon gases found in geologic formations beneath the earth's surface, of which the principal constituent is methane; or liquefied petroleum gas, as defined by the American Society for Testing and Materials in ASTM D1835; or a mixture of hydrocarbons that maintains a gaseous state at ISO conditions (*i.e.*, a temperature of 288 Kelvin, a relative humidity of 60 percent, and a pressure of 101.3 kilopascals), additionally, natural gas must either be composed of at least 70 percent methane by volume or have a gross calorific value between 35 and 41 megajoules (MJ) per dry standard cubic meter (950 and 1,100 Btu per dry standard cubic foot); or propane or propane-derived synthetic natural gas. *Propane* means a colorless gas derived from petroleum and natural gas, with the molecular structure C₃H₈.

[40 CFR 63.11237]

B. Opacity Standard

Boilers, heaters, and other fuel fired equipment listed in Table 1 of Attachment 2 shall not exceed the facility wide opacity standards in I.E of Section 2.

[PCC 17.16.165, PCC 17.16.130.B]

II. MONITORING AND RECORDKEEPING REQUIREMENTS

[PCC 17.12.185.A.3 & 4]

Follow the monitoring and recordkeeping requirements in II. and III. of Section 2.

III. REPORTING REQUIREMENTS

[PCC 17.12.185.A.5]

Follow the reporting requirements in IV.A through C of Section 2.

IV. TESTING REQUIREMENTS

[PCC 17.12.045, PCC 17.12.050 & PCC 17.20.010]

Follow the testing requirements in VI. of Section 2 of this permit.

SECTION 4

NON-NSPS / NON-NESHAP GENERATORS

In accordance with I.C, of Section 5 of this permit, the provisions in this Section apply to generators listed in Table 2 of Attachment 2. All provisions of this Section are locally enforceable unless otherwise noted.

I. EMISSION LIMITATIONS AND STANDARDS

[PCC 17.12.185.A.2]

A. Hour Limitation

The Permittee shall not operate the generator(s) for more than the number of hours per year allowed in Table 2 of Attachment 2 on a rolling twelve (12) month total basis.

[PCC 17.12.350.A.3.a]

[Material Permit Condition]

B. Fuel Limitation

The Permittee shall burn only the specified fuel(s) allowed for each generator in Table 2 of Attachment 2. The Permittee shall only fire fuel with sulfur content less than 0.90% by weight.

[PCC 17.16.340.F]

[Federally Enforceable & Material Permit Condition]

C. Opacity Limit

Generators shall comply with the facility-wide opacity standards in I.E of Section 2. In addition, the Permittee shall not cause or permit to be emitted into the atmosphere from any rotating stationary rotating machinery (generators) smoke for any period greater than ten consecutive seconds which exceeds 40 percent opacity; visible emissions when starting cold equipment shall be exempt from this requirement for the first ten minutes.

[PCC 17.16.040, PCC 17.16.130.B, & PCC 17.16.340.E]

II. MONITORING & RECORDKEEPING REQUIREMENTS

[PCC 17.12.185.A.3.d]

A. Hour limitation

For each generator identified as having an hour limitation in Table 1 of Attachment 2, the Permittee shall record the monthly operating hours and recalculate a rolling twelve (12) month total within 10 calendar days of the end of the month.

[PCC 17.12.185.A.3.d]

B. Fuel Limitation

In order to demonstrate compliance with the fuel limitation required in I.B of this Section, the Permittee shall maintain records of fuel supplier specifications which verify the sulfur content of the fuel, piped and/or as delivered.

C. Opacity Limit

The Permittee shall conduct a visible emissions check on the exhaust stack of each generator at least monthly if run during the month. For the purposes of this Section, a visible emission check is verification that abnormal emissions are not present at the generator stack. 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 type of corrective action taken (if required). No visible emissions checks are required for generators that only fire natural gas.

[PCC 17.12.185.A.3.d]

III. REPORTING AND TESTING REQUIREMENTS

Follow the reporting and testing requirements in IV. and VI. of Section 2 of this permit.

SECTION 5

SPECIFIC APPLICABILITY PROVISIONS

I. Permitted Facility Sources

The Specific Conditions in this permit apply to the following source categories, affected facilities, equipment, emission sources, installations, activities and operations at the facility.

A. Facility-Wide Operations

Except as provided in I.E of this Section, the following provisions apply to facility-wide operations (Section 2) and to all sources of air contaminants operating at the facility: Operating Restrictions, general control standards, materials handling standards, odor limiting standard, opacity standards, visibility limiting standard, and asbestos requirements for demolition and renovation activities.

[PCC 17.12.475, PCC 17.16.010., PCC 17.16.020 thru 050, 17.16.400.A, & PCC 17.16.430.F]

[Locally Enforceable Conditions]

B. Fossil-Fuel Fired Industrial and Commercial Equipment (Boilers and Heaters)

1. This section (Section 3) applies to existing industrial and commercial installations which are less than seventy-three megawatts capacity (two hundred fifty million British thermal units per hour); but in the aggregate on any premises are rated at greater than five hundred thousand British thermal units per hour (0.146 megawatts); and in which fuel is burned for the primary purpose of producing steam, hot water, hot air or other liquids, gases or solids and in the course of doing so the products of combustion do not come into direct contact with process materials.

2. Operating Restrictions

[PCC 17.12.350.A.3.a]

[Material Permit Conditions]

a. Applicable boilers identified in Table 1 of Attachment 2 that comply with Section 3 of this permit shall be considered to be compliant with the applicable requirements PCC 17.16.165.

[40 CFR 60.42c(d), 60.43c(e)(4), & 40 CFR 60.48(g) & PCC 17.16.165]

b. Should the Permittee desire to fire fuels in a boiler that do not meet the fuel limitations in Section 3 of this permit, the Permittee shall submit a significant revision in accordance with V.A of Section 2 of this permit.

[40 CFR 60.43c(e)(1), 40 CFR 63.1194(d), 40 CFR 63.11201(a), & Table 2, to NESHAP Subpart JJJJJJ]

C. Non-NSPS / Non-NESHAP Generators

This section (Section 4) applies to facility generators that are not subject to the NSPS standards in 40 CFR Part 60, Subpart IIII or the NESHAP standards in 40 CFR Part 63, Subpart ZZZZ.

[PCC 17.16.340]

D. Local (New and Existing) Stationary Source Performance Standards

Local stationary performance standards apply to the following facilities or operations: Fossil fuel fired industrial and commercial equipment, each stationary internal combustion engine, and each unclassified source.

[PCC 17.12.185.A.2, PCC 17.16.165, PCC 17.16.340, & PCC 17.16.430]

[Locally Enforceable Conditions]

E. Exempt Sources

The Specific Conditions contained in this air quality operating permit shall not apply to motor vehicles, agricultural vehicles, or agricultural equipment used in normal farm operations, unless their operation without a permit would result in a violation of the Act.

[PCC 17.12.140.C.3]

SECTION 6

FUGITIVE DUST CONTROL PLAN

I. MOTOR VEHICLE OPERATIONS

[PCC 17.16.070]

The Permittee shall not cause, suffer, allow, or permit a vacant lot, or an urban or suburban open area, to be driven over or used by motor vehicles, trucks, cars, cycles, bikes, or buggies, or by animals such as horses, without taking reasonable precautions to limit excessive amounts of particulates from becoming airborne. Dust shall be kept to a minimum by using an approved dust suppressant, or adhesive soil stabilizer, or by paving, or by barring access to the property, or by other acceptable means.

II. VACANT LOTS AND OPEN SPACES

[PCC 17.16.080]

- A. The Permittee shall not use or leave a vacant lot, housing plot, building site, parking area, sales lot, playground, livestock feedlot, or other open area - other than those used solely for soil-cultivation or vegetative crop-producing and harvesting agricultural purposes in such a state, after construction, alteration, clearing, leveling, or excavation that naturally induced wind blowing over the area causes a violation of I.E or I.F of Section 2 of this permit. Dust emissions must be permanently suppressed by landscaping, covering with gravel or vegetation, paving, or applying equivalently effective controls.
- B. The Permittee shall not allow a vacant lot, parking area, sales lot, or other open urban area to be used by motor vehicles in such a manner that visible dust emissions induced by vehicular traffic on the area cause a violation of I.E. or I.F of Section 2 of this permit.

III. ROADS AND STREETS

[PCC 17.16.090]

- A. The Permittee shall not cause, suffer, allow or permit the use, repair, construction or reconstruction of a roadway or alley without taking reasonable precautions to prevent excessive amounts of particulate matter from becoming airborne. Dust and other particulates shall be kept to a minimum by employing temporary paving, dust suppressants, wetting down, detouring or by other reasonable means.
- B. The Permittee shall not construct a new unpaved service road or unpaved haul road unless dust will be suppressed after construction by intermittently watering, limiting access, or applying chemical dust suppressants to the road, in such a way that visible dust emissions caused by vehicular traffic on the road do not violate I.E or I.F of Section 2 of this permit.
- C. The Permittee shall not cause, suffer, allow or permit transportation of materials likely to give rise to airborne dust without taking reasonable precautions, such as wetting, applying dust suppressants, or covering the load, to prevent particulate matter from becoming airborne. Earth or other material that is deposited by trucking or earth moving equipment shall be removed from paved streets by the person responsible for such deposits.
- D. The surfacing of roadways with asbestos tailings is prohibited.

IV. PARTICULATE MATERIALS

[PCC 17.16.100]

- A. The Permittee shall not cause, suffer, allow or permit crushing, screening, handling, transporting or conveying of materials or other operations likely to result in significant amounts of airborne dust without taking reasonable precautions, such as the use of spray bars, wetting agents, dust suppressants, covering the load, and hoods to prevent excessive amounts of particulate matter from becoming airborne.
- B. Dust emissions from the transportation of materials shall be effectively controlled by covering stock loads in open-bodied trucks, limiting vehicular speeds, or other equivalently effective controls.
- C. Emissions from a sandblasting or other abrasive blasting operation shall be effectively controlled by applying water to suppress visible emissions (wet blasting), enclosing the operation, or use of other equivalently effective controls.

V. STORAGE PILES

[PCC 17.16.110]

- A. The Permittee shall not cause, suffer, allow, or permit organic or inorganic dust producing material to be stacked, piled or otherwise stored without taking reasonable precautions such as chemical stabilization, wetting, or covering to prevent excessive amounts of particulate matter from becoming airborne.
- B. Stacking and reclaiming machinery utilized at storage piles shall be operated at all times with a minimum fall of material and in such manner, or with the use of spray bars and wetting agents, as to minimize and control to ensure compliance with I.E and I.F of Section 2 of this permit.

VI. ROADWAY AND SITE CLEANING MACHINERY

[PCC 17.16.470]

- A. The Permittee shall not cause, allow or permit to be emitted into the atmosphere from any roadway and site cleaning machinery smoke or dust for any period greater than 10 consecutive seconds, the opacity of which exceeds forty percent opacity. Visible emissions when starting cold equipment shall be exempt from this requirement for the first 10 minutes.
- B. In addition to complying with VI.A of this Section, the Permittee shall not cause, allow or permit the cleaning of any site, roadway, or alley without taking reasonable precautions to prevent particulate matter from becoming airborne. Reasonable precautions may include applying dust suppressants. Earth or other material shall be removed from paved streets onto which earth or other material has been transported by trucking, earthmoving equipment, erosion by water, or by other means.

VII. MONITORING AND RECORDKEEPING

The Permittee shall document corrective actions taken in accordance with II.A of Section 2 to comply with the standards in this Section.

GENERAL CONDITIONS

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 **520-724-7400**. The facsimile number is **520-838-7432**.
 - 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 33 N. Stone Avenue, Suite 700, 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 17.12.520. [PCC 17.12.185.A.9 & PCC 17.12.520]

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

[PCC 17.12.185.A.7.c]

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.

ATTACHMENT 1

APPLICABLE REGULATIONS

40 CFR, Part 60 Standards of Performance for New Stationary Sources

Subpart A	General Provisions
Appendix A	Test Methods

Pima County Code Title 17, Chapter 17.12 – Permits and Permit Revisions

Article I – General Provisions

17.12.010	Statutory Authority
17.12.020	Planning, Constructing, or Operating Without a Permit
17.12.040	Reporting requirements
17.12.045	Test methods and procedures
17.12.050	Performance tests
17.12.080	Permit Display or Posting

Article II – Individual Source Permits

17.12.165	Permit application processing procedures for Class II and Class III permits
17.12.185	Permit contents for Class II and Class III permits
17.12.235	Facility Changes that require a permit revision
17.12.240	Procedures for certain changes that do not require a permit revision Class II or Class III
17.12.255	Minor Permit Revision
17.12.260	Significant Permit Revision
17.12.270	Permit Reopenings – Revocation and reissuance – Termination
17.12.350	Material permit condition

Article VI – Individual Source Permits

17.12.520	Fees related to Class II and Class III permits
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Pima County Code Title 17, Chapter 17.16 – Emission Limiting Standards

Article I – General Provisions

17.16.010	Local rules and standards; Applicability of more than one standard
17.16.020	Noncompliance with applicable standards
17.16.030	Odor limiting standards

Article II – Visible Emission Standards

17.16.040	Standards and applicability (includes NESHAP)
17.16.050	Visibility limiting standard

Article IV – New and Existing Stationary Source Performance Standards

- 17.16.130 Applicability
- 17.16.165 Standards of performance for fossil-fuel fired industrial commercial equipment
- 17.16.340 Standards of performance for stationary rotating machinery
- 17.16.430 Standards of performance for unclassified sources

Pima County Code Title 17, Chapter 17.20 – Emissions Source Testing and Monitoring

- 17.20.010 Source sampling, monitoring and testing
- 17.20.040 Concealment of emissions

Pima County Code Title 17, Chapter 17.24:

- 17.24.020 Recordkeeping for compliance determination

Proposed Permit

ATTACHMENT 2

EQUIPMENT LIST

Table 1 – Boilers, Heaters, & Other Fuel Fired Equipment (ref. Section 3)

Equipment Number	Description	MFR/Model Model	Serial Number/ Unique ID	Maximum Rated Capacity	Date of MFR	Date Installed	Allowable Fuels and Annual Limits		Applicability ¹	
							Natural Gas	Fuel Oil	NSPS Subpart Dc	NESHAP Subpart JJJJJ
							(MMcf, hours, CF)	(Gallons, hours, CF)		
01	Boiler	Parker Rite Engineering 135	8519594 48679	1.35 MMBtu/hr	1997	Unknown	Unlimited	N/A	N/A	N/A
02	Boiler	Rite Engineering 135	8519596	1.35 MMBtu/hr	1985	Unknown	Unlimited	N/A	N/A	N/A
04	Boiler	Parker WH-1900	42457	1.9 MMBtu/hr	1993	Unknown	Unlimited	N/A	N/A	N/A
05	Boiler	Parker WH-3000	40228	3.0 MMBtu/hr	1991	Unknown	Unlimited	N/A	N/A	N/A
06	Boiler	Parker	8519595 58804	3.139 MMBtu/hr	2003	Unknown	Unlimited	N/A	N/A	N/A

MMcf – million cubic feet of Natural Gas (approximately equivalent to 1030 MMBtu for natural gas, 2500 MMBtu for Propane, 3200 MMBtu for Butane)

CF – Capacity Factor = the ratio of the actual heat input to a boiler to the potential amount if operated at the maximum capacity over an equivalent period of time (12 consecutive months or 8760 hours for annual limit).

For example: If a boiler 2655-01 fired 3 MMcf in 12 months. $CF_{\text{Fuel Oil}} = \frac{3 \text{ MMcf} \times 1030 \text{ MMBtu per MMcf of Natural Gas}}{1.35 \text{ MMBtu/hr} \times 8760 \text{ hours}} = \frac{3090 \text{ MMBtu}}{11826 \text{ MMBtu}} = 0.26$

¹ The Permittee must submit a significant permit revision and meet applicable NESHAP subpart JJJJJ work practices (tune-ups), notification, and reporting requirements for boilers that switch to fuel oil use and become subject to the Subpart JJJJJ in the oil firing subcategory as defined in 40 CFR 63.11237.

Table 2 – Generators / Non-NSPS / Non-NESHAP (ref. Section 4):

Equipment Number	Description	MFR	Model	Serial Number/ Unique ID	Maximum Rated Capacity	Run Hour Limitation ¹	Fuels Used	Date of MFR	Date Installed
07	Emergency Generator	Cummins	500 FDR7116JJW	RC-19-513473602	335 hp	100 hours	Diesel	01/1986	Unknown

¹The run hours are limited to maintenance testing and readiness checks. There is no limit on hours of operation during true emergencies. Should the generator(s) operate or become contractually obligated for more than 15 hours a year for the purposes of emergency demand response and to stabilize voltage deviations of 5 percent or greater below standard voltage, or should the above generators operate for non-emergency purposes to supply power as part of financial arrangement with another entity, the generators will be subject to NESHAP Subpart ZZZZ and the Permittee is required to submit a significant revision in accordance with V.A of Section 2 of the permit.

ATTACHMENT 3

INSIGNIFICANT ACTIVITIES

The following equipment or operations have been determined by the control officer, because of their size or production rate, to be de minimus emission sources and insignificant or trivial activities in accordance with PCC 17.04.340.A.(114)

Description	Maximum Rated Capacity	Fuels Used
Landscaping, building maintenance, or janitorial services.	-	-
Gasoline storage tanks; provided such storage tanks are equipped with a submerged filling device, or acceptable equivalent, for the control of hydrocarbon emissions in accordance with PCC 17.16.230.B.	≤ 10,000 gallons	Gasoline
Diesel or Fuel Oil Storage Tanks.	≤ 40,000 gallons each	Diesel
Batch mixers.	≤ 5 cubic feet	-
Wet sand and gravel production facilities whose permanent in-plant roads are paved and cleaned to control dust. This does not include activities in emissions units which are used to crush or grind any nonmetallic minerals.	≤ 200 tons/hour	-
Hand-held or manually operated equipment used for buffing, polishing, carving, cutting, drilling, machining, routing, sanding, sawing, surface grinding, or turning of ceramic art work, precision parts, leather, metals, plastics, fiberboard, masonry, carbon, glass or wood.	-	-
Powder Coating Operations	-	-
Internal combustion (IC) engine-driven compressors, IC engine-driven electrical generator sets, and IC engine-driven water pumps used only for emergency replacement or standby service. <i>Note: Portable or temporary IC engines or other non-road engines that operate, or are planned for operation, at a fixed location for more than 12 months are subject to stationary source permitting requirements. Portable or temporary IC located at a facility, may be required to keep records showing when the sources are transferred to or from the facility, or moved to alternate locations at the facility in order to establish that the sources are not stationary IC engines.</i>	-	-
Lab equipment used exclusively for chemical and physical analyses.	-	-
Trivial activities as provided in PCC 17.04.340.A.237 a through xx.	-	-

ATTACHMENT 4

EMISSIONS DISCHARGE OPACITY LIMITING STANDARDS

Table 17.16.040: EMISSIONS-DISCHARGE OPACITY LIMITING STANDARDS

Type of Source	Instantaneous Opacity Measurements			Maximum Allowable Average Opacity, %
	Required No. (For a Set)	Excluded No. (Highest Values)	No. to Use For Averaging	
Asbestos-Containing Operation ¹	25	0	25	0
Cold Diesel Engines ²	25	0	25	60
Loaded Diesel Engines ³	26	1	25	60
Incinerators	27	2	25	20
Portland Cement Plants ⁴	25	0	25	20
Other Sources ⁵	25	0	25	20

¹ An asbestos mill, manufacturing or fabrication operation which uses asbestos as a raw material, or spraying operation which sprays materials containing more than 1% asbestos by weight.

² Applicable to the first 10 consecutive minutes after starting up a diesel engine.

³ Applicable to a diesel engine being accelerated under load.

⁴ Applicable to kiln, clinker cooler, and other process equipment.

⁵ Any source not otherwise specifically covered within this table, unless otherwise specifically covered in this chapter.