

PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY

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

AIR QUALITY OPERATING PERMIT

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



ISSUED TO
TUCSON IRON & METAL
4484 EAST TENNESSEE STREET
TUCSON, ARIZONA 85701

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

THIS PERMIT ISSUED SUBJECT TO THE SPECIFIC CONDITIONS IDENTIFIED IN THIS PERMIT.

PDEQ PERMIT NUMBER 127

PERMIT CLASS II

PERMIT ISSUED APRIL 22, 2010

EXPIRES APRIL 21, 2015

REVISED APRIL 28, 2011

A handwritten signature in black ink, appearing to read "Mukonde Chama".

SIGNATURE

Mukonde Chama P.E., Air Permits Supervisor, PDEQ

TITLE

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PERMIT SUMMARY

Tucson Iron and Metal (TIM) is a metal recycling facility located at 4484 East Tennessee Street, Tucson, Arizona. Permitted activities which produce air emissions include a secondary aluminum sweater and a incinerator.

The secondary aluminum sweat furnace is used exclusively to reclaim aluminum scrap. The incinerator is used to destroy materials that are limited to: *marijuana, cocaine, methamphetamine, pharmaceuticals, wood, paper, burlap/fabric and associated wrapping.*

For the purposes of this permit, "pharmaceutical" means any chemical product, vaccine or allergenic (including any product with the primary purpose to dispense or deliver a chemical product, vaccine or allergenic), not containing a radioactive component, that is intended for use in the diagnosis, cure, mitigation, treatment, or prevention of disease or injury in man or other animals; or any chemical product, vaccine or allergenic (including any product with the primary purpose to dispense or deliver a chemical product, vaccine or allergenic), not containing a radioactive component, that is intended to affect the structure or function of the body in man or other animals. This definition includes products such as transdermal patches, and oral delivery devices such as gums or lozenges. This definition does not include sharps or other infectious or biohazardous waste, dental amalgams, medical devices not used for delivery or dispensing purposes, equipment, contaminated personal protective equipment or contaminated cleaning materials.

This operating permit is the second five-year permit issued to TIM, the Permittee. Potential emissions resulting from the facility operations include NO_x, VOC, HAPs, PM₁₀, SO_x and CO. This facility is a true minor source for all pollutants.

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	Potential Emissions* (Tons per Year)
Nitrogen Oxides (NO _x)	6.16
Carbon Monoxide (CO)	71.22
Volatile Organic Compounds (VOC)	4.49
Particulate Matter (as PM ₁₀)	1.07
Sulfur Oxides (SO ₂ + SO ₃)	26.22
Hazardous Air Pollutants (HAPs – total)	< 1.0

* Emissions extrapolated from stack test data dated 10/09/2007 and AP-42 Chapter 1, Section 4, Natural Gas Combustion.

All requirements of this permit that are Federally Enforceable or Material Permit Conditions are specifically indicated as such.

APPLICABILITY

This is an existing Class II true minor stationary source. The affected sources at the facility to which this air quality permit applies are grouped into the following emission source categories:

- Section A National Emission Standards for Hazardous Air Pollutants (NEHSAP) for Secondary Aluminum Production (Code of Federal Regulations (CFR) Title 40, Part 63, Subpart RRR).
- Section B Incinerator.
- Section C General Standards for the Facility.



Section A

Specific Conditions for NESHAP Affected Equipment

The provisions of Section A apply to the Aluminum Sweat Furnace identified in Table 1 of Attachment 2. Unless otherwise identified, all conditions in this Section are **Federally Enforceable Conditions**.

A. Emission Limitations and Standards

1. Dioxin/Furan (D/F) Standard

The Permittee must not discharge or cause to be discharged from the aluminum sweat furnace to the atmosphere emissions in excess of 0.80 nanogram (ng) of D/F TEQ¹ emissions per dscm (3.5 x 10⁻¹⁰ gr per dscf) at 11 percent oxygen (O₂). [40 CFR 63.1505(f)(2)]

2. Fuel Limitation Standard

The Permittee shall fire the aluminum sweat furnace exclusively with pipeline quality natural gas. [PCC 17.12.190.B]
[Locally Enforceable & Material Permit Condition]

B. Monitoring Requirements

1. Afterburner Operation

a. The aluminum sweat furnace afterburner shall be operated in accordance with the Operation, Maintenance and Monitoring (OM&M) Plan in B.3 of the Monitoring Requirements. [40 CFR 63.1506(h)(2)]

b. The Permittee is not required to conduct a performance test to demonstrate compliance with the emission standard of A.1 of this Section, provided that, the Permittee operates and maintains an afterburner with a design residence time² of 0.8 seconds or greater and maintains the 3-hr block average operating temperature of the afterburner at or above 1600°F. [40 CFR 63.1505(f)(1) & 40 CFR 63.1506(h)(1)]
[Material Permit Condition]

2. Afterburner Monitoring

a. The Permittee must install, calibrate, maintain, and operate a device to continuously monitor and record the operating temperature of the afterburner consistent with the requirements for continuous monitoring systems in subpart A of 40 CFR 63. [40 CFR 63.1510 (g)(1)]

b. The temperature monitoring device must meet each of these performance and equipment specifications: [40 CFR 63.1510 (g)(2)]

i. The temperature monitoring device must be installed at the exit of the combustion zone of the afterburner; [40 CFR 63.1510 (g)(2)(i)]

¹ D/F means dioxin /furan. *TEQ* means the international method of expressing toxicity equivalents for dioxins and furans as defined in "Interim Procedures for Estimating Risks Associated with Exposures to Mixtures of Chlorinated Dibenzo-p-Dioxins and -Dibenzofurans (CDDs and CDFs) and 1989 Update" (EPA-625/3-89-016), available from the National Technical Information Service (NTIS).

² See Technical Support Document for the definition of Residence Time (Section VI.G).

- ii. The monitoring system must record the temperature in 15-minute block averages and determine the average temperature for each 3-hour block period³. [40 CFR 63.1510 (g)(2)(ii)]
 - iii. If the aluminum sweat furnace does not run for three hours at a time, the Permittee may submit an application to the Control Officer to request for alternative monitoring options. Any such alternative monitoring application shall be processed according to the criteria and procedures set forth in 40 CFR 63.1510(w)(1) through (6). [40 CFR 63.1510 (w)]
 - iv. The recorder response range must include zero and 1.5 times the average temperature established by a performance evaluation⁴ according to the requirements in 40 CFR 63.1512(m). [40 CFR 63.1510 (g)(2)(iii)]
- c. The Permittee must conduct an inspection of each afterburner at least once a year and record the results. At a minimum, an inspection must include: [40 CFR 63.1510(g)(3)(i) – (xi)]
- i. Inspection of all burners, pilot light assemblies, and pilot light sensing devices for proper operation and clean pilot sensor;
 - ii. Inspection for proper adjustment of combustion air;
 - iii. Inspection of internal structures (e.g., baffles) to ensure structural integrity) baffles;
 - iv. Inspection of dampers, fans, and blowers for proper operation;
 - v. Inspection for proper sealing;
 - vi. Inspection of motors for proper operation;
 - vii. Inspection of combustion chamber refractory lining (the Permittee shall clean and replace lining as necessary); and
 - viii. Inspection of afterburner shell for corrosion and/or hot spots;
 - ix. Documentation, for the burn cycle that follows the inspection, that the afterburner is operating properly and any necessary adjustments have been made; and
 - x. Verification that the equipment is maintained in good operating condition.
 - xi. Following the afterburner equipment inspection, all necessary repairs must be completed in accordance with the requirements of the OM&M plan.
3. Operation, Maintenance and Monitoring Plan (OM&M)
- a. The Permittee must prepare and implement a written operation, maintenance, and monitoring (OM&M) plan for the aluminum sweat furnace. The OM&M plan shall include:
[40 CFR 63.1510(b)]

[Federally Enforceable Conditions]

³ 15-minute block averages, for example, if the 15-minute blocks last from 3:00 to 3:15, 3:15 to 3:30, etc., then a 3-hour block could last from 3:00 to 6:00). It must record the temperature at least once in each 15-minute interval.

⁴ Performance evaluation means the conduct of relative accuracy testing, calibration error testing, and other measurements used in validating the continuous monitoring system data.

- i. Process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges as applicable for the sweat furnace and afterburner; [40 CFR 63.1510(b)(1)]
 - ii. A monitoring schedule for the sweat furnace and afterburner; [40 CFR 63.1510(b)(2)]
 - iii. Procedures for the proper operation and maintenance of the sweat furnace and afterburner; [40 CFR 63.1510(b)(3)]
 - iv. Procedures for the proper operation and maintenance of monitoring devices used to determine compliance with the emission limitation in A.1 of this Section, including calibration and certification of accuracy of each monitoring device, at least once every 6 months, according to the manufacturer's instructions; [40 CFR 63.1510(b)(4) & 40 CFR 63.1510(b)(4)(i)]
 - v. Procedures for monitoring the aluminum sweat furnace process and afterburner parameters, including procedures for annual inspections of afterburners, and if applicable, the procedure to be used for determining charge/feed (or throughput) weight if a measurement device is not used; [40 CFR 63.1510(b)(5)]
 - vi. Corrective actions to be taken when the aluminum sweat furnace process or operating parameters or afterburner parameters deviate from the value or range established by B.3.a.i of this Section, including: [40 CFR 63.1510(b)(6)]
 - (A). Procedures to determine and record the cause of a deviation or excursion, and the time the deviation or excursion began and ended; and [40 CFR 63.1510(b)(6)(i)]
 - (B). Procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed. [40 CFR 63.1510(b)(6)(ii)]
 - vii. A maintenance schedule for the aluminum sweat furnace process and afterburner that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance. [40 CFR 63.1510(b)(7)]
- b. Based on the results from requirements under B.3 of this Section, the Control Officer may require that the Permittee make changes to the OM&M plan if the Control Officer or Administrator finds that the plan: [40 CFR 63.1510(b)]
- i. Does not address a deficiency that has occurred;
 - ii. Fails to provide for the proper operation of, the affected source, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution control practices; or;
 - iii. Does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, monitoring equipment or other deficiency's as quickly as practicable.
- c. If the Permittee determines that any other revisions of the OM&M plan are necessary, such revisions will not become effective until the Permittee submits a description of the changes and a revised plan incorporating them to the Control Officer. [40 CFR 63.1510(b)]

4. Establishment of monitoring and operating parameter values

The Permittee must establish a minimum or maximum operating parameter value, or an operating parameter range for each parameter to be monitored as required by 40 CFR 63.1510 that ensures compliance with the applicable emission limit or standard. To establish the minimum or maximum value or range, the Permittee must use the appropriate procedures in 40 CFR 63.1511 and submit the information required by 40 CFR 63.1515(b)(4) in the notification of compliance status report. The Permittee may use existing data in addition to the results of performance tests to establish operating parameter values for compliance monitoring provided each of the following conditions are met to the satisfaction of the Control Officer: [40 CFR 63.1511(g)]

- a. The complete emission test report(s) used as the basis of the parameter(s) is submitted. [40 CFR 63.1511(g)(1)]
- b. The same test methods and procedures as required by the 40 CFR 63 Subpart RRR were used in the test. [40 CFR 63.1511(g)(2)]
- c. The Permittee certifies that no design or work practice changes have been made to the source, process, or emission control equipment since the time of the report. [40 CFR 63.1511(g)(3)]
- d. All process and control equipment operating parameters required to be monitored were monitored as required in 40 CFR 63 Subpart RRR and documented in the test report. [40 CFR 63.1511(g)(4)]

5. Furnace Temperature Determination

The Permittee shall install and utilize devices to continuously read out the combustion chamber temperature and the holding chamber temperature (with readouts that are readily accessible to the Control Officer) in degrees Fahrenheit during the operation of the sweat furnace. The Permittee shall not operate the sweat furnace without the devices used to determine temperature read out with accuracy within plus or minus 10 degrees of the actual temperature. The Permittee shall adhere to the manufacturer's recommended operating, calibration, and maintenance procedures for the temperature-measuring device. [PCC 17.12.185.A.3]

[Locally Enforceable Condition]

6. Fuel limitation

The Permittee shall be considered in compliance with the fuel limitation requirement in A.2 of this Section, 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. Alternatively, the demonstration may be made by actual inspection of the equipment showing that pipeline natural gas is the only fuel supply plumbed to the equipment for firing. [PCC 17.12.185.A.3]

[Locally Enforceable Condition]

C. Recordkeeping Requirements

1. Operational Log

The Permittee record the results of the required monitoring on the Aluminum Sweat Furnace according to the approved OM&M plan and the Start-up, Shutdown and Malfunction Plan (SSM).

[PCC 17.12.185.A.4]

[Locally Enforceable Condition]

2. Afterburner Temperature Log

The Permittee shall maintain records of 15-minute block average afterburner operating temperature, including any period when the average temperature in any 3-hour block period falls below the compliant operating parameter value with a brief explanation of the cause of the excursion and the corrective action taken. The Permittee shall also maintain records of annual afterburner inspections.

[40 CFR 63.1517(b)(2)]

3. Record Retention

The Permittee must retain each record for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent 2 years of records must be retained at the facility. The remaining 3 years of records may be retained off site.

[40 CFR 63.1517(a)(1)]

4. Other Recordkeeping Requirements

See Additional Permit Requirements.

D. Reporting Requirements

[PCC 17.12.185.A.5]

1. Startup, Shutdown, and Malfunction Plans (SSM)

The Permittee shall develop and implement a written plan as described in 40 CFR 63.6(e)(3) that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the standard. The Permittee shall also keep records of each event as required by 40 CFR 63.10(b) and record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3). In addition to the information required in 40 CFR 63.6(e)(3), the plan must include:

[40 CFR 63.1516 (a)]

a. Procedures to determine and record the cause of the malfunction and the time the malfunction began and ended; and,

[40 CFR 63.1516 (a)(1)]

b. Corrective actions to be taken in the event of a malfunction of aluminum sweat furnace or the afterburner, including procedures for recording the actions taken to correct the malfunction or minimize emissions.

[40 CFR 63.1516 (a)(2)]

2. Excess Emissions/ Summary Report

Pursuant to 40 CFR 63.10(e)(3), the Permittee shall submit semiannual reports within 60 days after the end of each 6-month period. Each report must contain the information specified in 40 CFR 63.10(c). Reports shall be due February 28th and August 31st of each year covering the previous 6-month periods (July 1st through December 31st and January 1st through June 30th, respectively). When no deviation of parameters have occurred, the owner or operator must submit a report stating that no excess emissions occurred during the reporting period. The report must be submitted if any of these conditions occur during a 6-month reporting period: [40 CFR 63.1516 (b)]

- a. An excursion of a compliant process or operating parameter value or range (e.g., afterburner operating temperature, definition of acceptable scrap, or other approved operating parameter); [40 CFR 63.1516 (b)(iv)]
- b. An action taken during a startup, shutdown, or malfunction was not consistent with the procedure in the plan as described in 40 CFR 63.6(e)(3); and [40 CFR 63.1516 (b)(v)]

3. Other Reporting Requirements

See Additional Permit Requirements.

E. Testing Requirements

[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.

1. Emission Limitation

Permittee shall not be required to conduct a performance test to demonstrate compliance with the emission standard in A.1 of this Section when in compliance with B.1 of this Section.

[40 CFR 63.1505 (f)(1)]

[Material Permit Condition]

2. 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.

[40 CFR 60.1511(d) & PCC 17.12.045.D]

Section B

Specific Conditions for the Incinerator

The provisions of Section B apply to the Incinerator identified in Table 2 of Attachment 2.

A. Emission Limitations and Standards

[PCC 17.12.185.A.2]

1. Operating Hour Limitation

Permittee shall limit the hours of operation of the incinerator to daylight hours between the times of official sunrise and sunset.

[PCC 17.16.170.A]

[Material Permit Condition]

2. Emissions Limitation

Emissions from the incinerator stack shall not exceed 0.08 grains per cubic foot (0.18 grams/m³), based on dry flue gas at standard conditions, corrected to 12 percent CO₂.

[PCC 17.16.170.C.1 & PCC 17.16.510.B]

[Material Permit Condition]

3. Operation and Maintenance

a. Permittee shall operate and maintain the incinerator in accordance with the approved operation and maintenance plan detailed in B.3 of this Section.

[PCC 17.12.220.B]

b. All emissions from the incinerator (operating in either batch or rotary mode) must pass through the baghouse and exhaust out of the stack. The incinerator, baghouse, cooling towers and associated ductwork must be maintained and operated using good modern practices.

[PCC 17.12.185.A.2]

[Material Permit Condition]

c. The incinerator shall be operated in a manner that minimizes production of fugitive emissions.

[PCC 17.12.185.A.2]

★ **[Material Permit Condition]**

4. Process Limitation★

Permittee shall not incinerate any substance other than marijuana, cocaine, metamphetamine, pharmaceuticals, wood, paper, burlap/fabric and associated wrapping. In no instance shall the Permittee use any other combustion material (other than that above) to facilitate burning. The Permittee may use propane gas to ignite or sustain the incineration process.

5. Opacity Limitation

Permittee shall not cause, allow, or permit to be emitted into the atmosphere, smoke, fumes, gases, particulate matter or other gas-borne material which exceeds 20 percent opacity.

[PCC 17.16.170.B]

[Federally Enforceable Condition]

6. Emissions and Opacity Limitation Exemption

The incineration process shall be exempt from the emission and opacity requirements described in subsections A.2 and A.5 of this Section respectively for not more than 30 seconds in any 60-minute period.

[PCC 17.16.170.E]

B. Monitoring Requirements

[PCC 17.12.185.A.3]

1. To demonstrate compliance with the operational hour limitation in A.1 of this Section, the Permittee shall monitor the incinerator hours of operation.
2. To assure compliance with emissions limitation in A.2 of this Section, the Permittee shall operate and maintain the incinerator in accordance with the approved operation and maintenance plan.
[PCC 17.12.185.A.2]
3. The operational and maintenance plan shall specify the following:
 - a. Procedures for incinerator start up and shut down:
 - i. Mode of operation (rotary or batch).
 - ii. Material description (confirm it meets permit conditions).
 - iii. Date and time of inspection.
 - iv. Full name of person undertaking the inspection.
 - v. Condition status of the baghouse (# defective/torn).
 - vi. Condition status of the ductwork.
 - vii. Initial magnehelic gauge readings.
 - viii. Record of all malfunctions/defects.
 - ix. Before operation, any test, maintenance repair or other corrective measures taken during or after the inspection to ensure malfunctions/defects are resolved.
 - b. Operational Procedure:
 - i. Total lbs (pounds) of material processed on an hourly basis or per batch (if the operation is in batch mode) and the number of batches per day.
 - ii. Time of operation and hours of operation per day.
 - iii. Visible emissions monitoring from the stack at least twice during operation.
 - iv. Periodic fugitive emissions monitoring from the incinerator ash storage chamber, ductwork and cooling towers.
 - v. Monitoring of magnehelic gauges at least twice to ensure incinerator and ancillary equipment is operated within normal operational parameters.
 - vi. Any repair or corrective measures taken during the operation to ensure malfunctions/defects are resolved and fugitive emissions are prevented.
 - vii. Measures undertaken to control fugitive emissions from residue handling.

4. If the Control Officer determines that the operation and maintenance plan, detailed in B.2 of this Section, failed to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the Permittee shall revise the operation and maintenance plan within 30 days after such an event occurs.
5. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall operate and maintain the incinerator operations in a manner consistent with good air pollution control practices, consistent with the operation and maintenance plan required by B.2 of this Section.

C. Recordkeeping Requirements

[PCC 17.12.185.A.4]

1. The Permittee shall record all monitoring results during start up, operation and shut down of the incinerator as detailed in the incinerator operation and maintenance plan.
2. The Permittee shall record all malfunctions/defects during start up, operation and shutdown of the incinerator (if none then the record shall state none).
3. All records shall be retained for a minimum of five years and shall be made available to the Control Officer upon request.

D. Reporting Requirements

[PCC 17.12.185.A.5]

The Permittee shall report to the Control Officer any emissions in excess of the limits established by this permit.

[PCC 17.12.040]

E. Testing Requirements

[PCC 17.20.010]

1. The incinerator shall be tested for compliance with the mass emission limit in A.2 of this Section at least once during the permit term.
2. The reference methods in 40 CFR 60, Appendix A, shall be used to determine compliance with the mass emission standard as follows:

[PCC 17.16.170.G.1]

 - a. Method 4 and 5 for the concentration of particulate matter and the associated moisture content;
 - b. Method 1 for sample and velocity traverses;
 - c. Method 2 for velocity and volumetric flow rate;
 - d. Method 3 for gas analysis and calculation of excess air, using the integrated sampling technique.
3. For Method 5, the sampling time for each run shall be at least 60 minutes and the minimum sample volume shall be 0.85 dscm (30.0 dscf) except that smaller sampling times or sample volumes, when necessitated by process variables or other factors, may be approved by the Control Officer.

[PCC 17.16.170.G.2]
4. EPA Test Method 9 may be used to monitor compliance with the opacity standard in A.5 of this Section.

[PCC 17.20.010]

Section C

General Standards For The Facility

The provisions of Section C apply facility wide.

I. Odor Limitation

Permittee shall not cause or permit emissions from malodorous matter to cross a property line between the source and a residential, recreational, institutional, educational, retail sales, hotel or business premise without minimizing the emissions by applying good modern practices. [PCC 17.16.030]

II. Opacity Limitation

Permittee shall not cause or permit the effluent from any non-point source to have emissions with an optical density equal to or greater than 20%. [PCC 17.16.050.B.1]

III. Visible Emissions

No person shall 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 all necessary and feasible precautions to prevent particulate matter from becoming airborne. Sources may be required to cease entirely the activity or operation which is causing or contributing to the emissions. This shall not apply when wind speeds exceed twenty-five 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 [PCC 17.16.050.D]

IV. Maintenance Requirement

The Permittee shall, at all times, including periods of startup, shutdown, and malfunction, to the extent practicable, maintain and operate all equipment in a manner consistent with good air pollution control for minimizing emissions. [PCC 17.16.020.A]
[Material Permit Condition]

V. Applicable Emission Limit /Emission Standard

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

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 pursuant to PCC 17.12.040.B. To report excess emissions call **520-243-7400** or fax to **520-838-7432**.
 - 2. Detailed written notification by submission of an excess emissions report within 72 hours of the notification in 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 17.12.510. [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.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

REQUIREMENTS SPECIFICALLY IDENTIFIED AS APPLICABLE

Code of Federal Regulations (CFR), Title 40, Chapter I, Subchapter C-Air Programs:

Part 63 Subpart RRR New Source Performance Standards for Secondary Aluminum Production.

Pima County Code (PCC) Title 17, Chapters:

- 17.16.010 Local Rules and Standards; Applicability of more than one Standard.
- 17.16.040 Standards and Applicability (Includes NESHAP).
- 17.16.050 Visibility Limiting Standard.
- 17.16.170 Incinerators.
- 17.20.010 Source Sampling, Monitoring, and Testing.



ATTACHMENT 2

EQUIPMENT LIST

Type of Equipment	Maximum Rated Capacity	Fuel(s)	Make	Model	Serial Number	Date of Manufacture
Aluminum Sweat Furnace	5 MMBtu	Natural Gas	Al-Jon	AS-990	94980	1984
Rotary Incinerator	20,000 lbs/day	Natural Gas	Kipco	1A	001	2005
Batch Incinerator	8000 lbs/day	Natural Gas	Hoover (Custom)	N/A	N/A	Unknown
Baghouse	35,000 CFM	Electricity	OSA Sheet Metal	D-774B	N/A	1977
Baghouse	50,000 CFM	Electricity	Industrial Accessories Company	120BHT-A3-364:60S	N/A	Unknown
Afterburner	2.8 MM Btu	Natural Gas	Mideo	Incinamite Burners	N/A	Unknown