

**AUTHORIZATION TO OPERATE (ATO)**

**UNDER PDEQ CLASS II/III GENERAL AIR QUALITY PERMIT 6205  
For  
FUEL BURNING EQUIPMENT (BOILERS, HEATERS, & GENERATORS)**



**I. FACILITY INFORMATION:**

Business Name: Western Emulsion Inc. Tucson  
 Facility Name: Western Emulsions Inc. Tucson  
 Source Location: 3450 E 36th St, Tucson, AZ 85713

**Permitted Emissions Limits:**

Conventional or Criteria Air Pollutant (tons/year)								HAP(s) (tons/year)
PM <sub>2.5</sub>	PM <sub>10</sub>	PM	NO <sub>x</sub>	VOC	CO	SO <sub>2</sub>	Lead	Total
< 90	< 90	< 90	< 90	< 90	< 90	< 90	< 0.6	< 10

**II. AUTHORIZED EQUIPMENT:** Equipment, operations, and activities for which emissions are allowed by the general permit are as follows:

**Section 3 of the Permit – Fossil Fuel Fired Industrial and Commercial Equipment**

Equip.No.	Description/ Location	MFR/ Model	Serial Number/ Unique ID	Maximum Rated Capacity	Date of MFR	Date Installed	Allowable Fuels and Annual Limits		Applicability <sup>1</sup>	
							Natural Gas	Fuel Oil	NSPS Subpart Dc	NESHAP Subpart JJJJJ
							(MMcf, hours, CF)	(Gallons , hours, CF)		
30-001	Boiler	Superior	5796	10.5 MMBTU	1971	-	Unlimited	N/A	N/A	N/A
30-002	Hot Oil Heat	Phoenix	60605	6.3 MMBTU	-	-	Unlimited	N/A	N/A	N/A
30-003	Boiler	Superior	14001	12.6 MMBTU	1998	-	Unlimited	N/A	YES	N/A
30-004	Hot Oil Heat	Phoenix	0839	2.8 MMBTU	2008	-	Unlimited	N/A	N/A	N/A

<sup>1</sup> The Permittee must submit a significant revision to revise the ATO and meet applicable NESHAP subpart JJJJJ work practices (tune-ups), notification, and reporting requirements for applicable boilers that switch to fuel oil use and become subject to Subpart JJJJJ in the oil firing subcategory as defined in 40 CFR 63.11237. The revision will be subject to a 5-day public comment period.

**IV. OTHER APPLICABLE ATTACHMENTS:** Attachment 1 to the ATO – Fugitive Dust Requirements

Rupesh Patel, Air Program Manager, PDEQ

ATO #30	
Issued Date:	March 18, 2019
Effective Date:	March 25, 2019
Expiration Date:	January 4, 2022

**SPECIFIC CONDITIONS**

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

**Attachment 1 to ATO – Fugitive Dust Requirements**

In accordance with condition 119.f.i of the general permit, the provisions in this Attachment contain standards including reasonable precautions that apply to sources of fugitive dust or particulate matter, which due to a lack of an identifiable emission point or plume are classified as nonpoint sources.

**Emission Limitations and Standards**

[PCC 17.12.185.A.2]

1. *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.

2. *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 conditions 17 or 18 of the 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 conditions 17 or 18 of this permit.

3. *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 conditions 17 or 18 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.

4. *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.

5. *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 conditions 17 and 18 of this permit.

6. *Off-road, Roadway, and Site Cleaning Machinery* [PCC 17.16.450 & 470]

- a. The Permittee shall not cause, allow or permit to be emitted into the atmosphere from any off-road, roadway, and site cleaning machinery smoke or dust for any period greater than 10 consecutive seconds, the opacity of which exceeds forty percent. Visible emissions when starting cold equipment shall be exempt from this requirement for the first 10 minutes.
- b. In addition to complying with condition 6.a above, 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.

**Compliance Determination** [PCC 17.12.185.A.3, 4 & 5]

7. *Fugitive Dust Controls*

- a. In accordance with condition 21 of the general permit, the Permittee shall document any investigation or corrective action taken to comply with the standards and reasonable precautions in this Section.
- b. The Permittee shall maintain records of any discussions with PDEQ regarding the need for additional reasonably necessary and feasible precautions for dust control, and a list summarizing any agreed upon additional dust control requirements.

**Additional Applicable Requirements**

**Pima County Code Title 17, Chapter 17.16 – Emission Limiting Standards**

**Article III – Emissions from Existing and New Nonpoint Sources**

- 17.16.055 General
- 17.16.070 Fugitive dust emissions standards for motor vehicle operation
- 17.16.080 Vacant lots and open spaces
- 17.16.090 Roads and streets
- 17.16.100 Particulate materials
- 17.16.110 Storage piles
- 17.16.450 Off-road machinery