

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: City of Tucson-Environmental & General Services Department
 Facility Name: Sun Tran Northwest Maintenance & Operations
 Source Location: 3900-4000 N Sun Tran Blvd, Tucson, AZ 85705

Permitted Emissions Limits:

Conventional or Criteria Air Pollutant (tons/year)								HAP(s) (tons/year)
PM _{2.5}	PM ₁₀	PM	NO _x	VOC	CO	SO ₂	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	Allowable Fuels	Applicability ¹	
						NSPS Subpart Dc	NESHAP Subpart JJJJJ
6043-003	Multiple Boilers, Heaters, Dryers, Air Handling Units	-	Multiple	14.4 MMBTU	Natural Gas	NO	NO

¹ 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.

Section 4B – NESHAP for CI & SI RICE (Emergency Designated Engines):

Equip. No.	Description/ Location	MFR/ Model	Serial Number/ Unique ID	Maximum Rated Capacity	Date of MFR	Date Installed	Limitation ¹	Allowable Fuels
6043-001	Generator	Mitsubishi/4D34-T	4D34-J94226	94 hp	5/1/2004	5/1/2005	100 hours	Diesel

¹ The run hours are limited to maintenance testing and readiness checks and non-emergency operation in accordance with the federal requirements. There is no limit on hours of operation during true emergencies.

Rupesh Patel, Air Permit Manager, PDEQ

ATO #6043	
Issued Date:	December 7, 2017
Effective Date:	December 14, 2017
Expiration Date:	January 4, 2022

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Section 4C – NSPS for CI ICE (Emergency Designated Engines):

Equip. No.	Description/ Location	MFR/ Model	Serial Number/ Unique ID	Maximum Rated Capacity	Date of MFR	Date Installed	Run Hour Limitation ¹	Allowable Fuels
6043-002	Generator	Cummins/QL9-G3-NR3	46967871	399 hp	12/1/2008	10/1/2009	100	Diesel

¹. The run hours are limited to maintenance testing and readiness checks and non-emergency operation in accordance with the federal requirements. There is no limit on hours of operation during true emergencies.

Section 4C – Supplemental Requirements:

Equip. No.	Applicable NSPS Emission Standard	NO _x g/hp-hr	NMHC g/hp-hr	NMHC+NO _x g/hp-hr	CO g/hp-hr	PM g/hp-hr	Certified Emission Life (term, date)
6043-002	Model Year 2007 and Later Emergency	-	-	3.0	2.6	0.15	8,000 hours or 10 years, whichever comes first.

IV. OTHER APPLICABLE ATTACHMENTS:

Attachment 1 to the ATO – Fugitive Dust Requirements

Attachment 3 to the ATO – Gasoline Fuel Storage and Dispensing Requirements

Equip. No.	Description	Gasoline Annual Throughput Limit
6043-004	Gasoline Dispensing Facility	1,200,000 Gallons

Rupesh Patel, Air Permit Manager, PDEQ

ATO #6043	
Issued Date:	December 7, 2017
Effective Date:	December 14, 2017
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

SPECIFIC CONDITIONS

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

Attachment 3 to the ATO – Gasoline Fuel Storage and Dispensing Requirements

In accordance with condition 119.f.iii of the general permit, the provisions in this attachment apply to gasoline storage tanks and fuel dispensing facilities listed in the ATO. All provisions of this Section are Federally Enforceable unless otherwise noted.

Emission Limitations And Standards

[PCC 17.12.185.A.2]

1. *Operational Limitations*

- a. The Permittee shall not exceed the combined throughput of gasoline listed in the ATO for applicable storage tanks and fuel dispensing facilities. [PCC 17.12.350.A.3.a]

[Locally Enforceable & Material Permit Conditions]

2. *Submerged Fill or equivalent*

The Permittee must minimize emissions of hydrocarbons from a stationary tank, reservoir, or other container which has a capacity of at least 250 gallons but less than or equal to 40,000 gallons used for storing petroleum liquids by applying and maintaining the following controls: [PCC 17.16.230.B]

[Locally Enforceable & Material Permit Condition]

- a. Submerged fill pipe, or
- b. Refrigeration-type vapor recovery system or an equivalently effective control system.
- c. The Permittee shall equip all pumps and compressors which handle volatile organic compounds with mechanical seals or the equivalent. [PCC 17.16.230.D]

[Locally Enforceable & Material Permit Condition]

3. *State Approved Stage I Vapor Collection System*

The Permittee shall equip and operate a Stage I vapor collection system consisting of a vapor-tight return line from the storage tank(s) or its vent(s) to the gasoline transport vehicle, or a properly installed on-site vapor control system connected to a vapor collection system for all tanks associated with a gasoline dispensing site which has a monthly throughput greater than 10,000 gallons. The Permittee shall ensure that all system hardware and components conform to those systems and components certified by the State of California Air Resources Board (CARB) as of March 31, 2001 or after that date and has not been rejected by the Arizona Department of Environmental Quality, and through verification by inspection of the Control Officer, that the Stage I collection system or on-site vapor control system is in place and operating at each affected tank.

[A.R.S. §41-2132.A and B]

[Locally Enforceable & Material Permit Condition]

4. *NESHAP for Gasoline Dispensing Facilities ‘GDF’*

In accordance with condition 10, the provisions in this subsection apply to each GDF listed in the ATO. The General Provisions of 40 CFR Part 63, Subpart A apply to applicable GDF sources as indicated in Table 8 of 40 CFR Part 63, Subpart CCCCC.

- a. The Permittee shall not cause, allow or permit the **yearly** throughput of gasoline for each affected GDF facility covered by this permit and listed in the ATO to equal or exceed 100,000 gallons/month.

[PCC 17.12.350.A.3.a]

[Locally Enforceable & Material Permit Condition]

b. *General Duty to Minimize Emissions*

The Permittee must, at all times, including periods of startup, shutdown, and malfunction, operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Control Officer, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [PCC 17.12.350.A.3.a, 40 CFR 63.6(e)(1)(i), & 40 CFR 63, Subpart CCCCC, Table 3]

[Locally Enforceable & Material Permit Condition]

c. The Permittee must keep applicable records and submit reports as required in condition 7 of this Attachment.

d. For each permitted GDF: If a GDF ever exceeds an applicable throughput threshold, as listed below, the GDF remains subject to all requirements for sources above the threshold even if the affected source throughput later falls below the applicable throughput thresholds. [40 CFR 63.1111(i)]

e. *Requirements for GDF with monthly throughput < 10,000 gallons of gasoline:* [40 CFR 63.1116(a)]

[Material Permit Conditions]

i. The Permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following:

(a) Minimize gasoline spills;

(b) Clean up spills as expeditiously as practicable;

(c) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use.

(d) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.

ii. The Permittee is not required to submit notifications or reports as specified in 40 CFR 63.11125, 63.11126, or Subpart A but the Permittee must have records available within 24 hours of a request by the Control Officer to document gasoline throughput. [40 CFR 63.1116(b)]

iii. Portable gasoline tanks, filled from a fixed storage tank at a GDF and used to dispense into on-site motor vehicles or other gasoline-fueled engines within the area source, are subject to condition 4.e. [40 CFR 63.1111(j)]

f. *Requirements for GDF with monthly throughput of \geq 10,000 gallons of gasoline:*

[40 CFR 1117(a)]

[Material Permit Conditions]

i. The Permittee must comply with the requirements in condition 4.e of this Attachment.

ii. The Permittee shall use submerged filling when loading gasoline into storage tanks with greater than 249 gallon capacity.

(a) Submerged fill pipes installed on or before November 9, 2006, must be no more than 12 inches from the bottom of the tank.

- (b) Submerged fill pipes installed after November 9, 2006, must be no more than 6 inches from the bottom of the tank;
 - (c) Submerged fill pipes not meeting these specifications are allowed if the Permittee can demonstrate that the liquid level in the tank is always above the entire opening of the fill pipe.
- iii. The Permittee must have records available within 24 hours of a request by the Control Officer to document the gasoline throughput.

Compliance Determination

[PCC 17.12.185.A.3, 4, & 5]

5. *Operational Limitations*

[Locally Enforceable Conditions]

The Permittee shall keep and maintain an operation log for each fuel storage tank and dispensing facility as listed in the ATO. If no fuel was loaded into a listed tank during a given month, the log shall note that no fuel was received. The Permittee shall record the following information for each storage tank within 30 days of the end of the previous month:

- a. The quantity of fuel loaded, in gallons, with each addition (load) and the date of each addition.
- b. The monthly throughput as provided in condition 6.b, below, in gallons.
- c. The yearly throughput as provided in condition 6.c, below, in gallons.

6. *GDF Throughput Records*

[Material Permit Conditions]

- a. Recordkeeping to document throughput must begin upon startup for a new or reconstructed source. For existing sources, recordkeeping to document monthly throughput must begin on January 10, 2008. Records shall be kept for a period of five (5) years. [40 CFR 63.11111(e)]
- b. An affected source shall provide proof of throughput upon request by the Control Officer. [40 CFR 63.11111(e)]
- c. **Yearly** throughput shall be a **365-day** rolling total, calculated by summing the volume of gasoline loaded into, or dispensed from, all gasoline storage tanks at each GDF during the current day, plus the total volume of gasoline loaded into, or dispensed from, all gasoline storage tanks at each GDF during the previous 364 days. **Monthly** throughput shall be calculated using the **yearly** throughput and dividing that sum by 12. [40 CFR 63.11132]

7. *GDF Malfunction Records*

The Permittee shall keep a copy of the following records. For the purpose of reporting malfunctions as required by 40 CFR 63.11126, the Permittee shall follow condition 2 of the general permit. [40 CFR 63.11125(d)]

- a. Records of the occurrence and duration of each malfunction of operations (i.e. process equipment) or the air pollution control monitoring equipment; and
- b. Records of action taken during periods of malfunction to minimize emissions in accordance with condition 4.b of this Attachment including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

8. *Air Pollution Control Inspections for GDF with monthly throughput of $\geq 10,000$ gallons of gasoline:*

- a. The Permittee shall annually inspect the gasoline storage tanks' submerged fill devices. The inspections shall be used to determine whether all of the submerged fill devices are in good working order, according to good modern practices and any available industry practices or recommendations. [PCC 17.12.185.A.3.c]
[Locally Enforceable & Material Permit Condition]
- b. The Permittee shall annually inspect the vapor control recovery system(s), all pumps compressors, pipes, hoses mechanical seals or other equipment storing, handling, conveying or controlling VOCs and HAPs. The inspections shall be used to determine whether all equipment is in good working order according to good modern industry practices and any available manufacturer's recommendations. [PCC 17.12.185.A.3.c]
[Locally Enforceable & Material Permit Condition]
- c. The Permittee shall maintain documents of the inspections required by conditions 8.a and b of this Attachment with the following information:
 - i. ID of the device inspected;
 - ii. Date of the inspection;
 - iii. Results of the inspection; and
 - iv. Any corrective actions taken.
- d. The Permittee shall repair defective air pollution control equipment promptly and keep complete records of the maintenance and repairs performed.

9. *Throughput Increase > 100,000 gallons per month*

If the monthly throughput of the GDF facility exceeds 100,000 gallons per month, the Permittee must apply for an individual permit and comply with the additional control requirements in 40 CFR 63.11118 no later than 3 years after the date the affected source exceeded the threshold.

[40 CFR 63.11111(d), 40 CFR 63.11113(c) & PCC 17.12.350.A.3.a]

[Material Permit Condition]

10. *NESHAP Applicability*

40 CFR 63, Subpart CCCCCC – National Emission Standards for Hazardous Air Pollutants for Gasoline Dispensing Facilities (GDF). [PCC 17.16.530.B.106]

[Federally Enforceable Conditions]

a. *Applicability*

The emission sources to which this Attachment to the ATO applies are gasoline storage tanks and associated equipment components in vapor or liquid gasoline service at new, reconstructed, or existing GDF that meet the criteria specified in condition 10.a.i through ix as stated below. Pressure/Vacuum vents on gasoline storage tanks and the equipment necessary to unload product from cargo tanks into the storage tanks at GDF are covered emission sources. The equipment used for the refueling of motor vehicles is not covered. An affected source is a new affected source if you commenced construction on the affected source after November 9, 2006, and you meet the applicability criteria in condition 10.a.i through ix, as stated below, at the time you commenced operation. An affected source is reconstructed if you meet the criteria for reconstruction as defined in 40 CFR 63.2. An affected source is an existing affected source if it is not new or reconstructed. GDF must comply with the provisions by the dates specified in in 40 CFR 60.11113. [40 CFR 63.11112 & 40 CFR 63.11113]

- i. Applicable to each GDF that is located at an area source. The affected source includes each gasoline cargo tank during the delivery of product to a GDF and includes each storage tank. [40 CFR 63.11111(a)]

- ii. If your GDF has a monthly throughput of less than 10,000 gallons of gasoline, you must comply with the requirements in condition 4.e of this Attachment. [40 CFR 63.11111(b)]
- iii. If your GDF has a monthly throughput of 10,000 gallons of gasoline or more, you must comply with the requirements in condition 4.f of this Attachment. [40 CFR 63.11111(c)]
- iv. If your GDF has a monthly throughput of 100,000 gallons of gasoline or more, you must comply with the requirements in condition 9 of this Attachment. [40 CFR 63.11111(d)]
- v. An affected source shall, upon request by the Control Officer, demonstrate that their monthly throughput is less than the 10,000-gallon or the 100,000-gallon threshold level, as applicable. For new or reconstructed affected sources, as specified in condition 10, recordkeeping to document monthly throughput must begin upon startup of the affected source. For existing sources, as specified in condition 10.a, recordkeeping to document monthly throughput must begin on January 10, 2008. For existing sources that are subject to this subpart only because they load gasoline into fuel tanks other than those in motor vehicles, as defined in 40 CFR 63.11132, recordkeeping to document monthly throughput must begin on January 24, 2011. Records required under this paragraph shall be kept for a period of 5 years. [40 CFR 63.11111(e)]
- vi. The loading of aviation gasoline into storage tanks at airports, and the subsequent transfer of aviation gasoline within the airport, is not subject to this subpart. [40 CFR 63.11111(g)]
- vii. Monthly throughput is the total volume of gasoline loaded into, or dispensed from, all the gasoline storage tanks located at a single affected GDF. If an area source has two or more GDF at separate locations within the area source, each GDF is treated as a separate affected source. [40 CFR 63.11111(h)]
- viii. If the Permittee's affected source's throughput ever exceeds an applicable throughput threshold, the affected source will remain subject to the requirements for sources above the threshold, even if the affected source throughput later falls below the applicable throughput threshold. [40 CFR 63.11111(i)]
- ix. The dispensing of gasoline from a fixed gasoline storage tank at a GDF into a portable gasoline tank for the on-site delivery and subsequent dispensing of the gasoline into the fuel tank of a motor vehicle or other gasoline-fueled engine or equipment used within the area source is only subject to condition 4.e of this Attachment. [40 CFR 63.11111(j)]

Additional Requirements (If Applicable)

40 CFR, Part 63 National Emissions Standards for Hazardous Air Pollutants for Source Categories

Subpart CCCCCC NESHAP for Gasoline Dispensing Facilities