

AUTHORIZATION TO OPERATE (ATO)

UNDER PDEQ CLASS II GENERAL AIR QUALITY PERMIT 6205

For

FUEL BURNING EQUIPMENT (BOILERS, HEATERS, & GENERATORS)



I. FACILITY INFORMATION:

Business Name: TMC Healthcare
 Source Location: 5301 E. Grant Road, Tucson, AZ 85712

Permitted Emissions Limits, tons/year:

Conventional or Criteria Air Pollutant								HAP(s)
PM _{2.5}	PM ₁₀	PM	NO _x	VOC	CO	SO ₂	Lead	Total
5.76	6.04	6.04	90.72	12.25	48.42	89.16	Negligible	7.54

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 ¹	
							Natural Gas	Fuel Oil	NSPS Subpart Dc	NESHAP Subpart JJJJJ
							(MMcf, hours, CF)	(Gallons, hours, CF)		
01	Boiler Dual Fired	Warga W2-4000P	NB-001	22.5 MMBtu/hr	1999	2000	Unlimited	ULSD – Unlimited 0.5 wt. % S – 837,000 gal or 5100 hrs, 0.58 CF	Yes	Existing Gas Fired
02	Boiler Dual Fired	Warga W2-4000P	NB-002	22.5 MMBtu/hr	1999	2000	Unlimited	USD – Unlimited 0.5 wt. % S – 837,000 gal or 5100 hr, CF- 0.58	Yes	Existing Gas Fired
03	Boiler Dual fired	Warga W2-4000P	NB=003	22.5 MMBtu/hr	1999	2000	Unlimited	ULSD – Unlimited 0.5 wt. % S – 837,000 gal or 5100 hr, CF-0.58	Yes	Existing Gas Fired

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.

Rupesh Patel, Air Permit Manager, PDEQ

ATO # 971	
Issue Date:	November 8, 2021
Revised:	N/A
Expiration Date:	January 4, 2022

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Section 4A of the Permit – Non-NSPS/Non-NESHAP ICE (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
04	Generator Peppi's	Cummins 6CTA8.3-G2	46659543	235 hp	2005	2006	100 hours	Diesel
05	Generator #5 TOI	Caterpillar 92A04373-5	5YF01389	201 hp	1991	1992	100 hours	Diesel
06	Generator #6 PV	INT UV549	1738	65 hp	1953	1983	100 hours	Diesel
07	Generator #7 SW	JD/Kohler T04039D	4039TF00	80 hp	1991	1992	100 hours	Diesel
08	Generator #8 NE	JD/Kohler T0439T	4039DF001	44 hp	1992	1993	100 hours	Diesel
09	Generator #2 Surgery North	Caterpillar 3412PC	38S2306	755 hp	1978	1979	100 hours	Diesel
10	Generator #3 Surgery South	Caterpillar 3412PC	38S2304	755 hp	1978	1979	100 hours	Diesel

¹ The run hours are limited to maintenance testing and readiness checks. There is no limit on hours of operation during true emergencies. Should the generators operate or become contractually obligated for more than 15 hours a year for the purposes of emergency demand response, or should they operate for non-emergency purposes to supply power as part of a financial arrangement with another entity, the generators will be Subject to NESHAP Subpart ZZZZ as applicable and the Permittee will have to submit a revision.

Rupesh Patel, Air Permit Manager, PDEQ

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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
11	Generator P-1	Caterpillar 3516B TA	PBR00539	3286 hp	12-2007	2009	100 hours	Diesel
12	Generator P-2	Caterpillar 3516 CHD	SBK 01227	3634 hp	2012	2013	100 hours	Diesel
13	Generator P-3	Caterpillar 3516C	LYMO 1554	4218 hp	2020	2020	100 hours	Diesel
14	Generator 4-1 ED	Caterpillar 3516B	PBR00495	3286 hp	2007	2008	100 hours	Diesel
15	Generator #9 CCRS	Cummins QSB7-G3-NR3	H080204492	134 hp	2008	2008	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.

Section 4C – Supplemental Requirements:

Equip. No.	Applicable NSPS Emission Standard	NO _x g/kw-hr (g/hp-hr)	NMHC g/kw-hr (g/hp-hr)	NMHC+NO _x g/kw-hr (g/hp-hr)	CO g/kw-hr (g/hp-hr)	PM g/kw-hr (g/hp-hr)	Certified Emission Life (term, date)
11-14	Post Model 2007	-	-	4.8	2.6	0.15	8000 hour or 10 years, whichever comes first
15	Post Model 2007	-	-	3.0	3.7	0.22	8000 hour or 10 years, Whichever comes first

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III. OTHER APPLICABLE ATTACHMENTS:

Attachment 1 to the ATO – Fugitive Dust Requirements

Attachment 2 to the ATP – NESHAP Subpart JJJJJ Requirements for Oil Fired Boilers (if applicable)

Attachment 4 to the ATO – Surface Coating and Abrasive Blasting Requirements

1. Limits for Spray Applied Coatings and Solvents (combined):

1500	Gallons/Year
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2. Limits for Abrasive Blasting media:

300,000	Pounds/Year
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Rupesh Patel, Air Permit Manager, PDEQ

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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 2 to the ATO – NESHAP Subpart JJJJJ Requirements for Oil Fired Boilers

In accordance with condition 119.d and 119.f.ii of the general permit, and as stated in condition 8 below, the provisions in this attachment are applicable to new, reconstructed, or existing “oil-fired” boilers identified in the ATO that are subject to NESHAP Subpart JJJJJ. The general provisions of §63.1 through §63.15 apply to affected boilers as indicated in Table 8 to NESHAP Subpart JJJJJ. The provisions of this Attachment are Federally Enforceable unless otherwise noted.

[40 CFR Part 63, Subpart JJJJJ is implemented by the United States Environmental Protection Agency]

Emission Limitations and Management Practices

[PCC 17.12.185.A.2]

1. *Operation and Maintenance Requirement*

At all times you must 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. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Control Officer that 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.

[40 CFR 63.11205(a)]

2. *Emission Limits*

- a. The Permittee must comply with each emission limit specified in Table 1 of 40 CFR Part 63, Subpart JJJJJ that applies to the Permittee’s boiler, as stated in the Table 1 below.

[PCC 17.12.190.B & 40 CFR 63.11211(a) & Table 1 of 40 CFR Part 63, Subpart JJJJJ]

TABLE 1 – To Subpart JJJJJ of Part 63 - EMISSION LIMITS (Oil Fired Only)

If your boiler is in this subcategory...	Pollutant	Limit	Monitoring
New – Small (<10MMBtu/hr)	n/a	n/a	(See Below)
1. New oil-fired boilers (> 10 MMBtu/hr) that do not meet the definition of limited use boiler.	PM (Filterable)	0.03 lb/MMBtu of heat input	See below
<p>Note:</p> <p>For new or reconstructed oil-fired boilers that commenced construction or reconstruction on or before September 14, 2016 that combust only oil that contains no more than 0.50 weight percent sulfur or a mixture of 0.50 weight percent sulfur oil with other fuel not subject to a PM emission limit under 40 CFR Part 63, Subpart JJJJJ, and that do not use a post-combustion technology (except a wet scrubber) to reduce PM or sulfur dioxide emissions, are not subject to the PM emission limit until September 14, 2019, providing the Permittee monitors and records on a monthly basis the type of fuel combusted. If you intend to burn new type of fuel or fuel mixture, that does not meet the requirements of this paragraph, you must conduct a performance test within 60 days of burning the new fuel. On or after September 14, 2019, you are subject to the PM emission limit and you must demonstrate compliance with the PM emissions limit no later than March 12, 2020. [40 CFR 63.11210(e)]</p> <p>For new or reconstructed boilers that combust only ultra-low sulfur liquid fuel (distillate oil that has less than or equal to 15 ppm sulfur), you are not subject to the PM emission limit provided you monitor and record on a monthly basis the type of fuel combusted. [40 CFR 63.11210(f)]</p> <p>If you intend to burn a new type of fuel other than ultra-low sulfur liquid fuel or gaseous fuels as defined in 40 CFR 63.11237, you must conduct a performance test within 60 days of burning the new fuel type. [40 CFR 63.11220(b)(3)]</p>			<p>The Permittee monitors and records on a monthly basis the type of fuel combusted as provided in condition 36.c of the general permit. [PCC 17.12.350.A.3.a]</p>

- b. These standards apply at all times the affected boiler is operating, except during periods of startup and shutdown as defined in §63.11237, during which time the Permittee must comply only with Table 2 of 40 CFR Part 63, Subpart JJJJJ, as listed below. [40 CFR 63.11201(d)]

3. *Work Practice, Emission Reduction Measures, and Management Practices*

- a. The Permittee must comply with each work practice standard, emission reduction measure, and management practice specified in the table below, which applies to the Permittee’s boiler. An energy assessment completed on or after January 1, 2008 that meets or is amended to meet the energy assessment requirements in Table 2 satisfies the energy assessment requirement. A facility that operates under an energy management program established through energy management systems compatible with ISO 50001, that includes the affected units, also satisfies the energy assessment requirement. [40 CFR 63.11201(b)]

- b. These standards apply at all times the affected boiler is operating, except during periods of startup and shutdown as defined in 40 CFR 63.11237, during which time the Permittee must comply only with Table 2, as stated below. [40 CFR 63.11201(d)]

TABLE 2 - WORK PRACTICE STANDARDS, EMISSION REDUCTION MEASURES AND MANAGEMENT PRACTICES

If your boiler is in this subcategory...	You must meet the following ...
1. Existing or new oil-fired boilers (> 10 MMBtu/hr)	Minimize the boiler's startup and shutdown periods and conduct startups and shutdowns according to the manufacturer's recommended procedures. If manufacturer's recommended procedures are not available, you must follow recommended procedures for a unit of similar design for which manufacturer's recommended procedures are available.
4. Existing oil-fired boilers with heat input capacity greater than 5 MMBtu/hr that do not meet the definition of seasonal boiler or limited-use boiler, or use an oxygen trim system that maintains an optimum air-to-fuel ratio	Conduct an initial tune-up as specified in §63.11214, and conduct a tune-up of the boiler biennially as specified in §63.11223.
5. New oil-fired boilers with heat input capacity greater than 5 MMBtu/hr that do not meet the definition of seasonal boiler or limited use boiler, or use an oxygen trim system that maintains an optimum air-to fuel ratio.	Conduct a tune-up of the boiler biennially as specified in §63.11223.
8. Existing seasonal boilers	Conduct an initial tune-up as specified in §63.11214, and conduct a tune-up of the boiler every 5 years as specified in §63.11223
9. New seasonal boilers	Conduct a tune-up of the boiler every 5 years as specified in §63.11223.
10. Existing limited-use boilers	Conduct an initial tune-up as specified in §63.11214, and conduct a tune-up of the boiler every 5 years as specified in §63.11223.
11. New limited-use boilers	Conduct a tune-up of the boiler every 5 years as specified in §63.11223.
12. Existing oil-fired boilers with heat input capacity of equal to or less than 5 MMBtu/hr	Conduct an initial tune-up as specified in §63.11214, and conduct a tune-up of the boiler every 5 years as specified in §63.11223.
13. New oil-fired boilers with heat input capacity of equal to or less than 5 MMBtu/hr	Conduct a tune-up of the boiler every 5 years as specified in §63.11223.
14. Existing oil-fired boilers with an oxygen trim system that maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune-up	Conduct an initial tune-up as specified in §63.11214, and conduct a tune-up of the boiler every 5 years as specified in §63.11223.
15. New oil-fired boilers with an oxygen trim system that maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune-up	Conduct a tune-up of the boiler every 5 years as specified in §63.11223.

If your boiler is in this subcategory...	You must meet the following ...
<p>16. Existing oil-fired boilers (units with heat input capacity of 10 MMBtu/hr and greater), not including limited-use boilers</p>	<p>Must have a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in this table satisfies the energy assessment requirement. Energy assessor approval and qualification requirements are waived in instances where past or amended energy assessments are used to meet the energy assessment requirements. A facility that operated under an energy management program developed according to the ENERGY STAR guidelines compatible with ISO 50001 for at least a 1 year between January 1, 2008 and the compliance date specified in §63.11196 that includes the affected units also satisfies the energy assessment requirement. The energy assessment must include the following with extent of the evaluation for items (1) to (4) appropriate for the on-site technical hours listed in §63.11237:</p>
	<p>(1) A visual inspection of the boiler system,</p>
	<p>(2) An evaluation of operating characteristics of the affected boiler systems, specifications of energy use systems, operating and maintenance procedures, and unusual operating constraints,</p>
	<p>(3) An inventory of major energy use systems consuming energy from affected boiler(s) and which are under control of the boiler owner or operator,</p>
	<p>(4) A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage,</p>
	<p>(5) A list of major energy conservation measures that are within the facility's control,</p>
	<p>(6) A list of the energy savings potential of the energy conservation measures identified, and</p>
	<p>(7) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.</p>

Compliance Determination

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

4. Initial Compliance Requirements

- a. For existing affected boilers that have applicable work practice standards, management practices, or emission reduction measures, you must demonstrate initial compliance no later than the compliance date that is specified in condition 40 CFR 63.11196, as stated in condition 8 below, except as provided in condition 4.f below. [40 CFR 63.11210(c)]
- b. For new or reconstructed oil-fired boilers that commenced construction or reconstruction on or before September 14, 2016, that combust only oil that contains no more than 0.50 weight percent sulfur or a mixture of 0.50 weight percent sulfur oil with other fuels not subject to a particulate matter (PM) emission limit under this subpart and that do not use a post-combustion technology (except a wet scrubber) to reduce PM or sulfur dioxide emissions, you are not subject to the PM emission limit in Table 1 of this subpart until September 14, 2019, providing you monitor and record on a monthly basis the type of fuel combusted. If you intend to burn a new type of fuel or fuel mixture that does not meet the requirements of this paragraph, you must conduct a performance test within 60 days of burning the new fuel. On and after September 14, 2019, you are subject to the PM emission limit in Table 1 and you must demonstrate compliance with the PM emission limit in Table 1 no later than March 12, 2020. [40 CFR 63.11210(e)]
- c. For new or reconstructed boilers that combust only ultra-low-sulfur liquid fuel as defined in § 63.11237, you are not subject to the PM emission limit in Table 1 providing you monitor and record on a monthly basis the type of fuel combusted. If you intend to burn a fuel other than ultra-low-sulfur liquid fuel or gaseous fuels as defined in § 63.11237, you must conduct a performance test within 60 days of burning the new fuel. [40 CFR 63.11210(f)]
- d. For affected boilers that are new or reconstructed that have applicable work practice standards or management practices, you are not required to complete an initial performance tune-up, but you are required to complete the applicable biennial or 5-year tune-up as specified in §63.11223 as stated in condition 5.c through f of this attachment, no later than 25 months or 61 months, respectively, after the initial startup of the new or reconstructed affected source. [40 CFR 63.11210(g)]
- e. For affected boilers that switch fuels or make a physical change to the boiler that results in the applicability of a different subcategory within NESHAP, subpart JJJJJ, or the boiler becoming subject to subpart JJJJJ, you must demonstrate compliance within 180 days of the effective date of the fuel switch or the physical change. Notification of such changes must be submitted according to §63.11225(g) as stated in condition 7.f of this attachment. [40 CFR 63.11210(i)]
- f. For existing affected boilers that have not operated between the effective date of the rule and the compliance date that is specified for your source in §63.11196 as stated in condition 8, you must comply with the applicable provisions as specified below: [40 CFR 63.11210(k)]
 - i. The Permittee must complete the initial performance tune-up, if subject to the tune-up requirements in condition 5 of this attachment, by following the procedures described in condition 5.b no later than 30 days after the re-start of the affected boiler.
 - ii. The Permittee must complete the one-time energy assessment, if subject to the energy assessment requirements specified in Table 2, no later than 30 days after the restart of the affected boiler.
- g. The Permittee must conduct a performance tune-up according to condition 5 of this Attachment. [40 CFR 63.11214(b)]

- h. If the Permittee operates an existing affected boiler with a heat input capacity of 10 million Btu per hour or greater, the Permittee must submit a signed certification in the Notification of Compliance Status report that an energy assessment of the boiler and its energy use systems was completed according to Table 2 and is an accurate depiction of your facility at the time of the assessment or that the maximum number of on-site technical hours specified in the definition of energy assessment applicable to the facility has been expended. [40 CFR 63.11214(c)]

5. *Continuous Compliance Requirements*

- a. For affected sources subject to the work practice standard or the management practices of a tune-up, the Permittee must conduct a performance tune-up according to condition 5.b through f of this Attachment, and keep records as required in 40 CFR 63.11225(c), as stated in condition 7.c of this Attachment, to demonstrate continuous compliance. The Permittee must conduct the tune-up while burning the type of fuel (or fuels in the case of boilers that routinely burn two types of fuels at the same time) that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up. [40 CFR 63.11223(a)]
- b. Except as specified in condition 5.c through f of this Attachment, the Permittee must conduct a tune-up of the boiler biennially to demonstrate continuous compliance as specified in condition 5.b.i through vii as stated below. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up. For a new or reconstructed boiler, the first biennial tune-up must be no later than 25 months after the initial startup of the new or reconstructed boiler. [40 CFR 63.11223(b)]

Tune Up Procedures

- i. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the Permittee may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. [40 CFR 63.11223(b)(1)]
- ii. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. [40 CFR 63.11223(b)(2)]
- iii. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the Permittee may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection. [40 CFR 63.11223(b)(3)]
- iv. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject. [40 CFR 63.11223(b)(4)]
- v. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 CFR 63.11223(b)(5)]
- vi. Maintain on-site and submit, if requested by the Administrator, a report containing the following information: [40 CFR 63.11223(b)(6)]
 - (a) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler. [40 CFR 63.11223(b)(6)(i)]

- (b) A description of any corrective actions taken as a part of the tune-up of the boiler. [40 CFR 63.11223(b)(6)(ii)]
- (c) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit. [40 CFR 63.11223(b)(6)(iii)]
- vii. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup. [40 CFR 63.11223(b)(7)]
- c. Boilers with an oxygen trim system that maintain an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune-up must conduct a tune-up of the boiler every 5 years as specified in condition 5.b.i through vii., as stated above. Each 5-year tune-up must be conducted no more than 61 months after the previous tune-up. For a new or reconstructed boiler with an oxygen trim system, the first 5-year tune-up must be no later than 61 months after the initial startup. The Permittee may delay the burner inspection specified in condition 5.b.i and inspection of the system controlling the air-to-fuel ratio specified in condition 5.b.iii, as stated above, until the next scheduled unit shutdown, but the Permittee must inspect each burner and system controlling the air-to-fuel ratio at least once every 72 months. If an oxygen trim system is utilized on a unit without emission standards to reduce the tune-up frequency to once every 5 years, set the oxygen level no lower than the oxygen concentration measured during the most recent tune-up. [40 CFR 63.11223(c)]
- d. Seasonal boilers must conduct a tune-up every 5 years as specified in condition 5.b.i through vii. as stated above. Each 5-year tune-up must be conducted no more than 61 months after the previous tune-up. For a new or reconstructed seasonal boiler, the first 5-year tune-up must be no later than 61 months after the initial startup. The Permittee may delay the burner inspection specified in condition 5.b.i until the next scheduled unit shutdown, but the Permittee must inspect each burner and system controlling the air-to-fuel ratio at least once every 72 months. Seasonal boilers are not subject to the emission limits in Table 1 or the operating limits in Table 3 to subpart JJJJJ. [40 CFR 63.11223(d)]
- e. Oil-fired boilers with a heat input capacity of equal to or less than 5 million Btu per hour must conduct a tune-up every 5 years as specified in condition 5.b.i through vii. Each 5-year tune-up must be conducted no more than 61 months after the previous tune-up. For a new or reconstructed oil-fired boiler with a heat input capacity of equal to or less than 5 million Btu per hour, the first 5-year tune-up must be no later than 61 months after the initial startup. The Permittee may delay the burner inspection specified in condition 5.b.i and inspection of the system controlling the air-to-fuel ratio specified in condition 5.b.iii, as stated above, until the next scheduled unit shutdown, but you must inspect each burner and system controlling the air-to-fuel ratio at least once every 72 months. [40 CFR 63.11223(e)]
- f. Limited-use boilers must conduct a tune-up every 5 years as specified in condition 5.b.i through vii. Each 5-year tune-up must be conducted no more than 61 months after the previous tune-up. For a new or reconstructed limited-use boiler, the first 5-year tune-up must be no later than 61 months after the initial startup. The Permittee may delay the burner inspection specified in condition 5.b.i and inspection of the system controlling the air-to-fuel ratio specified in condition 5.b.iii, as stated above, until the next scheduled unit shutdown, but you must inspect each burner and system controlling the air-to-fuel ratio at least once every 72 months. Limited-use boilers are not subject to the emission limits in Table 1, the energy assessment requirements in Table 2, or the operating limits in Table 3 to subpart JJJJJ. [40 CFR 63.11223(f)]

6. Monitoring Requirements

Comply with condition 36 of the general permit.

7. *Notification, Reporting, And Recordkeeping Requirements*

a. *Notifications Requirements*

The Permittee must submit the following notifications to the Administrator.

- i. The Permittee must submit an Initial Notification as required in 40 CFR 63.9(b)(2) no later than January 20, 2014 or within 120 days after the source becomes subject to the standard.
[40 CFR 63.11225(a)(2)]
- ii. The Permittee must submit the Notification of Compliance Status in accordance with 40 CFR 63.9(h) no later than 120 days after the applicable compliance date specified §63.11196, as stated in condition 8, unless you must conduct a performance stack test. If you own or operate a new boiler subject to a requirement to conduct a tune-up, you are not required to prepare and submit a Notification of Compliance Status for the tune-up. If you must conduct a performance stack test, you must submit the Notification of Compliance Status within 60 days of completing the performance stack test. You must submit the Notification of Compliance Status in accordance with condition 7.a.ii(a) & (e), as stated below. The Notification of Compliance Status must include the information and certification(s) of compliance as provided below, as applicable, and signed by a responsible official.
[40 CFR 63.11225(a)(4)]
 - (a) You must submit the information required in 40 CFR 63.9(h)(2), except the information listed in 40 CFR 63.9(h)(2)(i)(B), (D), (E), and (F).
[40 CFR 63.11225(a)(4)(i)]
 - (b) “This facility complies with the requirements in 40 CFR 63.11214 to conduct an initial tune-up of the boiler.”
[40 CFR 63.11225(a)(4)(ii)]
 - (c) “This facility has had an energy assessment performed according to 40 CFR 63.11214(c).”
[40 CFR 63.11225(a)(4)(iii)]
 - (d) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: “No secondary materials that are solid waste were combusted in any affected unit.”
[40 CFR 63.11225(a)(4)(v)]
 - (e) The notification must be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart JJJJJ is not available in CEDRI at the time that the report is due, the written Notification of Compliance Status must be submitted to the Administrator at the appropriate address listed in 40 CFR 63.13.
[40 CFR 63.11225(a)(4)(vi)]

b. *Reporting Requirements*

- i. The Permittee must prepare, by March 1 of each year, and submit to the delegated authority upon request, an annual compliance certification report for the previous calendar year containing the information below. You must submit the report by March 15 if you had any instance described by condition 7.b.i.(c). For boilers that are subject only to the energy assessment requirement and/or a requirement to conduct a biennial or 5-year tune-up according to §63.11223(a) and not subject to emission limits or operating limits, you may prepare only a biennial or 5-year compliance report as specified in condition 7.b.i.(a) and (b).
[40 CFR 63.11225(b)]
 - (a) Company name and address.
[40 CFR 63.11225(b)(1)]

- (b) Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements. Your notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official: [40 CFR 63.11225(b)(2)]
 - (i) “This facility complies with the requirements in §63.11223 to conduct a biennial or 5-year tune-up, as applicable, of each boiler.” [40 CFR 63.11225(b)(2)(i)]
 - (ii) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: “No secondary materials that are solid waste were combusted in any affected unit.” [40 CFR 63.11225(b)(2)(ii)]
- (c) If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken. [40 CFR 63.11225(b)(3)]
- ii. The Permittee shall maintain on-site and submit, if requested by the Administrator, a report containing the following information: [40 CFR 63.11223(b)(6)]
 - (a) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler. [40 CFR 63.11223(b)(6)(i)]
 - (b) A description of any corrective actions taken as a part of the tune-up of the boiler. [40 CFR 63.11223(b)(6)(ii)]
 - (c) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit. [40 CFR 63.11223(b)(6)(iii)]

c. *Recordkeeping Requirements*

The Permittee must maintain the records specified below: [40 CFR 63.11225(c)]

- i. As required in 40 CFR 63.10(b)(2)(xiv), the Permittee must keep a copy of each notification and report that the Permittee submitted to comply and all documentation supporting any Initial Notification or Notification of Compliance Status that the Permittee submitted. [40 CFR 63.11225(c)(1)]
- ii. The Permittee must keep records to document conformance with the work practices, emission reduction measures, and management practices required by 40 CFR 63.11214 and 40 CFR 63.11223 as specified in below: [40 CFR 63.11225(c)(2)]
 - (a) Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned. [40 CFR 63.11225(c)(2)(i)]
 - (b) For each boiler required to conduct an energy assessment, you must keep a copy of the energy assessment report. [40 CFR 63.11225(c)(2)(iii)]

- (c) For each boiler subject to an emission limit in Table 1 to this subpart, you must keep records of monthly fuel use by each boiler, including the type(s) of fuel and amount(s) used. For each new oil-fired boiler that meets the requirements of conditions 4.b or c, you must keep records, on a monthly basis, of the type of fuel combusted. [40 CFR 63.11225(c)(2)(iv)]
- (d) For each boiler that meets the definition of seasonal boiler, you must keep records of days of operation per year. [40 CFR 63.11225(c)(2)(v)]
- (e) For each boiler that meets the definition of limited-use boiler, you must keep a copy of the federally enforceable permit that limits the annual capacity factor to less than or equal to 10 percent and records of fuel use for the days the boiler is operating. [40 CFR 63.11225(c)(2)(vi)]
- iii. Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment. [40 CFR 63.11225(c)(4)]
- iv. Records of action taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in 40 CFR 63.11205, as stated in condition 1, including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal manner of operation. [40 CFR 63.11225(c)(5)]
- v. A copy of the report required in condition 5.b.vi. [40 CFR 63.11223(b)(6)]
- d. The Permittee's records must be in a form suitable and readily available for expeditious review. You must keep each record for 5 years following the date of each recorded action. You must keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. You may keep the records off site for the remaining 3 years. [40 CFR 63.11225(d)]
- e. If The Permittee has switched fuels or made a physical change to the boiler and the fuel switch or change resulted in the applicability of a different subcategory within subpart JJJJJ, in the boiler becoming subject to subpart JJJJJ, or in the boiler switching out of subpart JJJJJ due to a change that results in the boiler meeting the definition of gas-fired boiler as defined in § 63.11237, or the Permittee has taken a permit limit that resulted in being subject to, or no longer being subject to, subpart JJJJJ, the Permittee must provide notice of the date upon which the Permittee switched fuels, made the physical change, or took a permit limit within 30 days of the change. The notification must identify: [40 CFR 63.11225(g)]
 - i. The name of the owner or operator of the affected source, the location of the source, the boiler(s) that have switched fuels, were physically changed, or took a permit limit, and the date of the notice.
 - ii. The date upon which the fuel switch, physical change, or permit limit occurred.

8. *Affected Sources*

- a. The provisions of this Attachment to the ATO are applicable to owners and operators of industrial, commercial, or institutional boilers as defined in §63.11237 that are located at, or part of, an area source of hazardous air pollutants (HAP), as defined in §63.2, except as specified in §63.11195. [40 CFR 63.11193]

- b. Applicable to each new, reconstructed, or existing affected source as follows: [40 CFR 63.11194(a)]
 - i. The affected source is the collection of all existing industrial, commercial, and institutional boilers within a subcategory, as listed in §63.11200 and defined in §63.11237, located at an area source. [40 CFR 63.11194(a)(1)]
 - ii. The affected source is each new or reconstructed industrial, commercial, or institutional boiler within a subcategory, as listed in §63.11200 and as defined in §63.11237, located at an area source. [40 CFR 63.11194(a)(2)]
 - iii. An affected source is an “existing” source if construction or reconstruction was commenced on or before June 4, 2010. [40 CFR 63.11194(b)]
 - iv. An affected source is a new source if construction was commenced after June 4, 2010, and the boiler meets the applicability criteria at the time construction commenced. [40 CFR 63.11194(c)]
 - v. An affected source is a reconstructed source if the boiler meets the reconstruction criteria as defined in §63.2, reconstruction commenced after June 4, 2010, and the boiler meets the applicability criteria at the time reconstruction commenced. [40 CFR 63.11194(d)]
 - vi. An existing dual-fuel fired boiler meeting the definition of gas-fired boiler, as defined in §63.11237, that meets the applicability requirements after June 4, 2010 due to a fuel switch from gaseous fuel to solid fossil fuel, biomass, or liquid fuel is considered to be an existing source under as long as the boiler was designed to accommodate the alternate fuel. [40 CFR 63.11194(e)]

c. *Compliance Dates*

- i. If you own or operate an existing affected boiler, you must achieve compliance with the applicable provisions as follows:
 - (a) If the existing affected boiler is subject to a work practice or management practice standard of a tune-up, you must achieve compliance with the work practice or management practice standard no later than March 21, 2014.
 - (b) If the existing affected boiler is subject to emission limits, you must achieve compliance with the emission limits no later than March 21, 2014.
 - (c) If the existing affected boiler is subject to the energy assessment requirement, you must achieve compliance with the energy assessment requirement no later than March 21, 2014.
- ii. If you start up a new affected source on or before May 20, 2011, you must achieve compliance with the provisions of no later than May 20, 2011.
- iii. If you start up a new affected source after May 20, 2011, you must achieve compliance with the provisions of upon startup of your affected source.

SPECIFIC CONDITIONS

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

Attachment 4 to the ATO – Surface Coating, Solvent Degreasing, and Abrasive Blasting Requirements

In accordance with Condition 119.f.iv of the permit, the terms and Conditions in this Attachment are applicable to surface coating and/or abrasive blasting operations listed in the ATO. All provisions of this section are locally enforceable unless otherwise noted.

Emission Limitations and Standards

[PCC 17.13.020.A.2]

1. Operating/Usage Limitations

[PCC 17.12.350.A.3.a]

[Material Permit Conditions]

For the purpose of these provisions, *VOC containing* and *HAP containing* surface coating materials shall be determined as specified in Condition 5 of this Attachment as necessary. Surface coatings shall include but not be limited to coatings, paints, adhesives, sealants, diluents, wash, and clean-up solvents used at the facility, unless otherwise determined to be an insignificant activity. [PCC 17.16.400, PCC 17.04.340.A.219]

- a. The Permittee shall not allow the annual total combined usage of coatings, diluents, and solvents (including solvents used for spray gun washing, and solvent wipe cleaning, and other solvent surface cleaning) to exceed the daily and annual amounts listed in the ATO without applying for facility change in accordance with PCC 17.13.100.
- b. The Permittee shall not use abrasive blasting media in excess of the daily and annual amounts listed in the ATO without applying for a facility change in accordance with PCC 17.13.100.

2. Organic Solvents and Surface Coating Operation Standards

a. Prohibited Activities

- i. The Permittee is prohibited from conducting or performing paint stripping operations that involve the use of methylene chloride (MeCl, CAS 75092), and except for facility maintenance, the Permittee is prohibited from conducting any spray application of coatings that contain target HAP to metal or plastic parts or products, without having first submitted an Initial Notification in accordance with 40 CFR Part 63, Subpart HHHHHH to the Control Officer and complying with the applicable requirements. The Control Officer may provide a supplement to this Attachment containing Specific Conditions for applicable sources (See Supplement to Attachment 4 for NESHAP Subpart HHHHHH affected sources). [PCC 17.12.350.A.3.a, PCC 17.16.530.B.111, 40 CFR 63.11169 & 63.11180]

[Material Permit Condition]

- ii. The Permittee is prohibited from using halogenated solvents in solvent degreasing/cleaning units in a total concentration that is greater than 5 percent by weight HAP, without having first submitted an Initial Notification in accordance with 40 CFR 63, Subpart T to the Control Officer and complying with the applicable requirements. The Control Officer may provide a supplemental attachment containing Specific Conditions for sources subject to 40 CFR 63, Subpart T.

[PCC 17.12.350.A.3.a, PCC 17.16.530.B.16, NESHAP Subpart T Applicability]

[Material Permit Condition]

b. Suitable Enclosure

The Permittee shall not conduct any spray coating or spray paint operation without minimizing organic solvent emissions. Such operations, other than *architectural coating* and *spot painting*, shall be conducted in an enclosed area equipped with controls containing no less than ninety-six percent of the overspray. Enclosures shall be designed and operated according to the following requirements:

[PCC 17.16.400.C.1 & PDEQ Tech Policy 202]

- i. Ensure that all facilities using less than 60 gallons in any month or more than 522 gallons per year of any surface coating or paint products (including diluents) use at least a partial enclosure with at least the following controls:
 - (a) Spray coating operations shall be conducted inside a confined area that has at least three sides at least 8 feet high. Confined areas with a forced air exhaust must have a filtering system meeting the requirements in Condition 2.a.ii.
 - (b) No spray coating operations shall be conducted if the confining structure or confined area has any visible rips, tears, or holes.
 - (c) Spray coating operations shall be conducted so that the over spray remains within the enclosure. This includes but is not limited to the following:
 - (i) Using the spray gun in a horizontal or downward pointing manner so that the overspray is directed at the walls or floor of the enclosure.
 - (ii) No spraying within three feet of the open end and within 2 feet of the top of the enclosure.
 - (iii) Conducting spray coating operations when wind conditions do not cause overspray to be visibly emitted from the enclosure.
 - (d) If any evidence of overspray or visible emissions is observable from the enclosure or crossing the property line of the source, the spray coating operation must be conducted in accordance with Condition 2.a.ii below and as described in Condition 4.a.i.(a).
- ii. Ensure that all facilities using more than 60 gallons in any month or more than 522 gallons per year of surface coating or paint products (including diluents) use suitable enclosures using the following controls:

[PDEQ Policy No. Tech 202]

 - (a) An approvable operation shall be one that is conducted in any suitable enclosure where the overspray is directed to either:
 - i. A filtering system designed for controlling the particulate portion of the overspray;
 - ii. A commercially designed water curtain or equivalent;
 - iii. A baffle system designed for the purpose, along with a statement by the manufacturer that the 96% overspray control requirement will be met; or
 - iv. Any other system, which can be shown to meet the 96% overspray control requirement.Use of one or more of the controls in Condition 2.a.ii.(a) demonstrates compliance, unless evidence of overspray is observed outside of the enclosure.
 - (b) For the purpose of approving filtering or other systems in Condition 2.a.ii.(a) the Control Officer may approve any system where the overspray is exhausted through one or more filters commercially designed for the primary purpose of removal of particulate matter from spray applied surface coating and painting operations. Such spray booths shall be installed and maintained in accordance with the manufacture’s recommendations, or an operation and maintenance plan developed by the Permittee.
 - (c) The spray booth exhaust must be directed vertically up into the atmosphere and at a reasonable stack height as described in PCC 17.11.150.

c. Architectural Coating Standard

The Permittee (or contractor) shall not employ, evaporate or dry any architectural coating containing photochemically reactive solvents (PRS) for industrial or commercial purposes, or thin or dilute any architectural coating with a PRS. A PRS shall be any solvent with an aggregate of more than 20% of its total volume composed of the chemical compounds as classified below, or which exceeds any of the percentage composition limitations as stated below. Whenever any organic solvent or any constituent of an organic solvent may be classified from its chemical structure into more than one of the groups of organic compounds described below, it shall be considered to be a member of the group having the least allowable percent of the total volume of solvents:

[PCC 17.16.400.C.2-4]

- i. A combination of the following types of compounds having an olefinic or cyclo-olefinic type of unsaturation-hydrocarbons, alcohols, aldehydes, esters, ethers, or ketones: 5%.
 - ii. A combination of aromatic compounds with eight or more carbon atoms to the molecule, except ethylbenzene: 8%.
 - iii. A combination of ethylbenzene, ketones having branched hydrocarbon structures, trichloroethylene or toluene: 20%.
- d. Industrial Coating Source Standard [PCC 17.16.400.C.5]
- i. No industrial coating source may operate a coating application system that emits VOC in excess of the following:
 - (a) 4.3 pounds per gallon (0.5 kilograms per liter) of coating, excluding water, delivered to a coating applicator that applies clear coatings.
 - (b) 3.5 pounds per gallon (0.42 kilograms per liter) of coating, excluding water delivered to a coating applicator in a coating application system that is air dried or forced warm air dried at temperatures up to one hundred ninety-four degrees Fahrenheit (ninety degrees centigrade).
 - (c) 3.5 pounds per gallon (0.42 kilograms per liter) of coating, excluding water, delivered to a coating applicator that applies extreme performance coatings.
 - (d) 3.0 pounds per gallon (0.36 kilograms per liter) of coating, excluding water, delivered to a coating applicator for all other coatings and coating application systems.
 - ii. If more than one emission limitation in Condition 2.d.i applies to a specific coating, then the least stringent emission limitation shall be applied.
 - iii. All VOC emissions from solvent washings shall be considered in the emission limitations in Condition 2.d.i, unless complying with Condition 2.e.ii below.
- e. Solvent Degreasing/Cleaning/Handling Requirements
- i. Solvent degreasing units shall be equipped with drain-back devices to keep the basin empty when not in use and/or lids closed when not in use. Solvent degreasing units shall be operated according to manufacturer’s recommendations and shall be free of leaks. [PCC 17.16.400.A]
 - ii. Spray gun washing, solvent degreasing, and surface cleaning operations shall comply with the general materials handling standards in the permit. All solvent washings shall be directed into containers that prevent evaporation into the atmosphere. The Permittee shall store all VOC containing and HAP containing intended for disposal including but not limited to rags, waste coatings, solvents, waste brushes, waste rollers, waste applicators, in closed, leak-free containers which are legibly labeled with their contents and which remain covered when not in use.
 - iii. All VOC and HAP emissions from solvent washings shall be considered in the emission limitations in this Attachment, unless such solvent is directed into containers that prevent evaporation into the atmosphere as provided in Condition 2.e.ii. [PCC 17.16.400.A, PCC 17.16.400.C.1 & 7]

3. Abrasive Blasting Operations

For the purpose of this Condition, small commercial abrasive blasting (glove-type) cabinets shall be considered insignificant activities, provided they are equipped with a filtration control device.

- a. Emissions from a sandblasting or other abrasive blasting operation shall be effectively controlled by applying water to suppress visible emissions (incl. wet abrasive blasting and hydro-blasting), enclosing the operation, or use of other equivalently effective controls. For the purpose of this paragraph, vacuum blasting, or air blast (dry) systems that use certified abrasive blasting media as provided in Condition 3.c, in a manner that readily complies with the opacity and visibility limiting standards in Conditions 17 and 18 of the permit, while in operation, shall be considered to be an equivalently effective control.

[PCC 17.16.100.D]

[Federally Enforceable Condition]

- b. The Permittee shall perform dry abrasive blasting operations within confined enclosures, unless the surface being blasted is considered architectural, an appurtenance, or is located in a fixed permanent location and cannot be readily moved into a confined enclosure, or is otherwise not able to be dismantled into smaller sections that can be reasonably processed inside a confined enclosure due to its size.
- c. The Permittee shall not cause, suffer, allow or permit the use of any abrasive blasting agent (media) in an unconfined dry abrasive blasting operation other than an abrasive that has been certified by the California Air Resources Board (CARB) in accordance with Section 92530 of Title 17, Division 3, Chapter 1, Subchapter 6, Article 4 of the California Code and Regulations effective as of December 26, 2000. An abrasive purchased during the certified period remains certified for use following its expiration date.

Compliance Determination

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

- 4. All records required by or generated to monitor compliance with this Attachment shall be recorded and maintained in accordance with Conditions 24 – 26 of the permit. The following documentation shall be kept in a complete and consistent manner and made available for review during normal business hours such that the compliance status of the operation or activity can be readily ascertained at any time. [PCC 17.24.020]

a. Organic Solvents and Surface Coating Operations

i. Enclosures for spray applied coatings (if applicable)

- (a) While in operation, the Permittee shall inspect each partial enclosure exterior at least once per calendar month for evidence of overspray and record the results. If evidence of overspray is apparent, the Permittee shall document the corrective actions taken pursuant to Condition 2.b.i(d).
- (b) If the facility usage increases above 60 gallons in any month, or more than 522 gallons per year, or if there is any evidence of overspray from partial enclosures, or visible emissions are observed crossing the property line of the source, the Permittee shall notify the Control Officer within 30 days in accordance with Condition 30 of the permit and within 180 days design a suitable enclosure for approval by the Control Officer. The Permittee shall submit a startup notification required by PCC 17.13.110.C and D upon startup of an installed suitable enclosure along with an operation and maintenance plan.
- (c) While in operation, the Permittee shall monitor the exhaust filter pressure gauge (in inches of water) of each suitable enclosure listed in the permit equipment list, as required by Condition 2.b.ii, and record the results at least once per calendar month*; and as necessary, replace and maintain the exhaust filter or other control device according to the manufacturer's specifications an operation and maintenance plan. * Note: units not equipped with an exhaust filter pressure gauge shall monitor adequate flow through the enclosure using a chalk bag or hand-held smoke generator to verify that emissions are drawn into any opening in the enclosure at least once per month.

ii. VOC or HAP containing surface coating materials usage and handling (as applicable)

The Permittee shall keep the following records of the VOC containing or HAP containing surface coating materials used in surface coating operations in a complete and consistent manner to include but not be limited to coatings, paints, adhesives, sealants, diluents, wash, and clean-up solvents.

- (a) The name, indexed ID, and Safety Data Sheet (SDS), for surface coating materials used onsite including the identification, where necessary, of coatings which fall into the following subcategories (as applicable).
 - (i) Surface coatings including coatings used for outdoor spot painting

- (ii) Industrial Coating Source class category (i.e. clear, extreme, performance, air dried, or other coating, See Condition 2.d). In addition, records of the monthly VOC emission rate in lb/gal (as applied) for each coating category class as determined from enclosure usage logs.
 - (iii) Architectural Coatings, as applicable.
 - (iv) Solvent degreasing solvents, as applicable.
- (b) The following records of surface coating usage (in gallons):
- (i) If the facility uses more than 60 gallons in any month or more than 522 gallons per year:
 - (A) The Permittee shall maintain purchase records showing the volume (in gallons) of each surface coating material used each month and the resulting 12-consecutive month facility total; and
 - (B) For each suitable enclosure, logs of the gallons of each VOC containing or VHAP containing material used each month and the resulting 12-consecutive month facility total. The surface coating materials shall be recorded in an enclosure operating log and shall be identified with an indexed ID with a known VOC and HAP content. The 12-consecutive month total is defined as the sum of the usage for the current month and the usage for the previous eleven months.
 - (ii) If the facility uses less than 60 gallons in any month or less than 522 gallons per year:

The Permittee shall maintain purchase records showing the volume (in gallons) of each surface coating material purchased for use each month and the facility totals for the current and previous year. Actual invoices and receipts of material purchased shall suffice in place of ledger-style records.
- iii. When conducting architectural or outdoor spot painting activities not normally applied in an enclosure, the Permittee shall maintain daily logs of the following:
- i. The location of the activity, application method (airless, air assisted airless, HVLP, spray can, (et. al.) and the controls used (if any); and
 - ii. The type of coating applied and applicable SDS or indexed ID (as provided in Condition 4.a.ii.(a)(iii) above); and
 - iii. The amount of coating and solvents (excluding water) used, in gallons Solvent Handling and Degreasing (as applicable)
- b. Solvent Degreasing/Cleaning/Handling Requirements
- When listed in the equipment list, the Permittee shall inspect areas of solvent handling, degreasing, and waste storage at least monthly for leaks and proper handling procedures for compliance with Condition 2.e and record the results and any corrective actions taken.
- c. Abrasive Blasting Operations
- The Permittee shall total the amount, in pounds, of abrasive blasting agents used in abrasive blasting operations as provided in Conditions 4.c.i and 4.c.ii, below, within 30 days of the end of the month and maintain a record of the 12-month rolling totals to demonstrate compliance with the limits in the ATO.
- i. For each enclosed abrasive blasting operation listed in the ATO, the Permittee shall log the daily and monthly amounts of abrasive blasting agents used, in pounds.
 - ii. When conducting non-enclosed outdoor abrasive blasting operations, the Permittee (or contractor) shall maintain daily logs of the following information for each day of operation. If no operations occur, no logs shall be required.
 - (a) The location of the activity and controls used (if any); and
 - (b) The abrasive blasting agent used; and
 - (c) The amount of abrasive blasting agent used, in pounds.

5. Testing Requirements

[PCC 17.11.160, PCC 17.11.210 & PCC 17.20.010]

The Permittee shall use the following methods to comply with any surface coating and solvent degreasing/cleaning operations or HAP containing materials testing or analysis requirements:

- a. The VOC content (percent by weight) of liquid surface coatings may be determined through one of the following methods:
 - i. Use of Safety Data Sheets (SDS) or Technical Data Sheet supplied by the manufacturer. If the VOC content is expressed as a range the highest amount shall be used;
 - ii. A manufacturer’s certification of the VOC content;
 - iii. ASTM 2369 – “Standard Test Method for Volatile Content of Coatings” or an equivalent;
 - iv. The methods set forth in 40 CFR Part 60, Appendix A; and
 - v. If otherwise unknown, the Permittee shall use a default VOC content of 8 lbs/gallon.

- b. The HAP content (percent by weight) of liquid materials used may be determined through one of the following methods:
 - i. Use of Safety Data Sheets (SDS). If the HAP content for a material is specified as a range the highest amount shall be used.
 - ii. A manufacturer’s certification of the HAP content.
 - iii. The methods set forth in 40 CFR Part 60, Appendix A.
 - iv. A standard analytical methodology published by ASTM or EPA.
 - v. If otherwise unknown, the Permittee shall use a default HAP content of 6 lbs/gallon.

Definitions

The following definitions shall have the meaning as defined in the Clean Air Act or Title 17 of the Pima County Code. If a term is not defined, it shall be interpreted in accordance with normal business use:

Air Pollution or Air Pollutant means the presence in the outdoor atmosphere of one or more air contaminants or combination thereof, in sufficient quantities, which either alone or in connection with other substances, by reason of their concentration and duration are or tend to be injurious to human, plant, or animal life; or causes damage to property; or unreasonably interferes with the enjoyment of life or property of a substantial part of a community, or obscures visibility; or which in any way degrades the quality of the ambient air below the standards established by the board of supervisors.

Appurtenance means any accessory to a stationary structure coated at the site of installation, whether installed or detached, including but not limited to bathroom and kitchen fixtures; cabinets; concrete forms; doors; elevators; fences; hand railings; heating equipment, air conditioning equipment, and other fixed mechanical equipment or stationary tools; lamp posts; partitions; pipes and piping systems; rain gutters and downspouts; stairways, fixed ladders, catwalks, and fire escapes; and window screens.

Architectural coating means a coating used commercially or industrially for residential, commercial or industrial buildings and their *appurtenances*; structural steel; and other fabrications such as storage tanks, bridges, beams and girders.

Coating As Applied means the composition of the coating at the time immediately prior to its application, including any final addition of solvent (diluent) to the coating formulation before such coating is applied.

Halogenated hazardous air pollutant solvent or halogenated HAP solvent means solvents that contain methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5), and chloroform (CAS No. 67-66-3).

HAP containing material means a material that contains any volatile or nonvolatile HAP that is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) at a concentration greater than 0.1 percent by mass, or greater than 1.0 percent by mass for any other HAP compound.

For the purpose of determining whether materials used contain the HAP compounds, the Permittee may rely on formulation data provided by the manufacturer or supplier, such as the safety data sheet (SDS), as long as it represents HAP compound in the material that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other HAP compounds.

Hazardous Air Pollutant (HAP) means a pollutant listed in § 112 (b) of the Clean Air Act (CAA).

Industrial coating source means an industrial source that surface coats large farm machinery, such as harvesting, fertilizing, and planting machines, tractors, and combines; small farm machinery, such as lawn and garden tractors, lawn mowers, and rototillers; small appliances, such as fans, mixers, blenders, crock pots, dehumidifiers, and vacuum cleaners; commercial machinery, such as office equipment, computers and auxiliary equipment, typewriters, calculators, and vending machines; industrial machinery, such as pumps, compressors, conveyor components, fans, blowers, and transformers; fabricated metal products, such as metal covered doors and frames; any other industrial facility which coats metal parts or products under the standard industrial classification code (SIC Manual 1987) major groups 33, 34, 35, 36, 37, 38, and 39 categories **except all of the following**: automobiles and light duty trucks; metal cans; flat metal sheets and strips in the form of rolls or coils; magnet wire for use in electrical machinery; metal furniture; large appliances; exterior or airplanes; automobile refinishing; customized top coating of automobiles and trucks, if production is less than 35 vehicles per day; and the exterior of marine vessels.

Indexed ID means an indexed identification number or code used for log entry's to identify the use of a specific surface coating product and reference to a product or safety data sheet with a determined VOC and HAP(s) content.

Insignificant Activity means an activity in an emissions unit that is not otherwise subject to any applicable requirement and belongs to one of the categories defined in PCC 17.04.340.A.114, or any other activity which the Control Officer determines is not necessary, because of its emissions due to size or production rate, to be included in an application in order to determine all applicable requirements or calculate any fee under Title 17 of the PCC.

Operation means any physical or chemical action resulting in the change in location, form, physical properties or chemical character of a material.

Partial Enclosure means a confined area that has at least three sides at least 8 feet high meeting the requirements of Condition 2.b.i.(a).

Solvent degreasing means the removal of loosely held uncured adhesives, uncured ink, uncured coatings and contaminants which include dirt, soil and grease from parts, products, tools, machinery, equipment, and general work areas using a solvent that contains two percent by weight or more of a regulated air pollutant.

Solvent degreasing unit means any single container with a capacity of two gallons or more used for solvent degreasing.

Source means any building, structure, facility or installation that may cause or contribute to air pollution or the use of which may eliminate, reduce or control the emission of air pollution.

Spot Painting means any spray painting for the purpose of lettering, stenciling, or identifying containers or similar work; any painting using a spray can; or any spray painting where less than 50% of the total surface area of the object is coated and the total surface area coated is less than 16 square feet.

Suitable Enclosure means a confined area, completely enclosed (side curtains or small openings are allowed as long as the ventilation air maintains the enclosure under negative pressure such that air is drawn into the booth openings or side curtains, where all exhaust from the controls is controlled as described in Condition 2.a.i of this Attachment.

Volatile Organic Compounds (VOC) means any compound of carbon, excluding carbon monoxide (CO), carbon dioxide (CO₂), carbonic acid, metallic carbides, or carbonates, and ammonium carbonate, which participates in atmospheric photochemical reactions. This includes any organic compound other than those in the definition in PCC 17.04.340.A(250), which have been determined to have negligible photochemical reactivity.

VOC Containing means a material that contains two percent by weight or more VOC as determined by the manufacturer's safety data sheet (SDS) or technical product data sheet, or ASTM 2369, or methods set forth in 40 CFR 60, Appendix A. For the purpose of determining whether materials used contain the VOC compounds, the Permittee may rely on formulation data provided by the manufacturer or supplier, such as the safety data sheet (SDS).

VHAP Containing means a HAP containing material that contains volatile HAP constituents.

Additional Applicable Regulations

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

Article III – Emissions from Existing and New Nonpoint Sources

17.16.100.D Particulate materials (abrasive blasting)

17.16.400 Organic solvents and other organic materials

Pima County Department of Environmental Quality – Technical Procedures

PDEQ Tech Policy 202 – Controlling Overspray in Paint Spray Operations