

PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR PROGRAM

33 N. Stone Avenue, Suite 700 • Tucson, AZ 85701 • Phone (520) 724-7400

AIR QUALITY PERMIT

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

**ABB, INC.
TUCSON SERVICE CENTER
1401 E. VALENCIA ROAD
TUCSON, AZ 85706**

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

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

PERMIT NUMBER **6025**

PERMIT CLASS **III**

ISSUED: **November 10, 2016**

EXPIRES: **November 09, 2021**

REVISED: **February 26, 2018** AMMENDED: **November 6, 2018**



SIGNATURE

Rupesh Patel, Air Permit Manager, PDEQ

TITLE

TABLE OF CONTENTS

<u><i>Permit Summary</i></u>	3
<u><i>Specific Conditions</i></u>	4
 <u><i>Section 1 – General Applicability</i></u>	
Statutory Authority.....	4
Permit Classification.....	4
Permitted Facility Sources.....	4
Applicability of More Than One Standard.....	4
 <u><i>Section 2 – Facility-Wide Requirements</i></u>	
Emission Limitations and Standards.....	5
Monitoring Requirements.....	7
Recordkeeping Requirements.....	7
Reporting Requirements.....	8
Facility Changes.....	8
Testing Requirements.....	9
 <u><i>Section 3 – Service Center Operations</i></u>	
Emission Limitations and Standards.....	10
Compliance Determination.....	11
 <u><i>General Conditions</i></u>	
 <u><i>Attachment 1: Applicable Regulations</i></u>	
 <u><i>Attachment 2: Equipment List</i></u>	
 <u><i>Attachment 3: List of Insignificant Activities</i></u>	
 <u><i>Attachment 4: Emissions Discharge Opacity Limiting Standards</i></u>	

PERMIT SUMMARY***Location Information***

This air quality permit is issued to the existing Tucson Service Center, operated by ABB, Inc. (ABBI) the Permittee. The facility is located at 1401 E. Valencia Road, Tucson, AZ 85706 upon a parcel identified by Pima County Assessor's Parcel # 140-24-079B, with Coordinates: 32.135045 degrees Latitude, -110.949648 degrees Longitude.

Source Description

The ABBI Tucson Service Center repairs various heavy electrical and mechanical equipment including electric motors, armatures, generators, alternators, transformers, switchgear and traction motors. The permitted stationary emission sources at the facility consist of a heat cleaning oven and bake oven and organic solvent and surface coating operations. The heat curing oven is used to thermally de-laminate the insulation/copper matrix, originally formed through the application of an electrical varnish to copper windings and subsequent curing.

The activities and operations covered by this permit are those stationary sources which fall under the following industrial classification:

- SIC Code: 7699 – Commercial and Industrial Machinery and Equipment (except Automotive and Electronic) Repair and Maintenance (NAICS 811310)

Air Permit Information

This is the second renewal of the air quality permit. ABBI – Tucson Service Center operates as an existing Class III, Stationary Source. The facility is a true minor source of all regulated pollutants.

The following table summarizes the potential to emit of the source. These emission values are taken from the information contained in the renewal application, standard emission factors from AP-42 Compilation of Air Pollution Emission Factors – Volume 1: Stationary and Area Sources, and 2X the maximum estimated emissions from solvents and coatings surface coating and degreasing operations. The emission values are for information purposes only and are not intended to be enforceable limits unless otherwise noted in the Specific Conditions of this permit.

Controlled Facility-Wide Potential Emissions of Pollutants ¹ (tons/yr)										
Conventional or Criteria Air Pollutant								NSPS	HAPs	
PM_{2.5}	PM₁₀	PM	NO_x	VOC	CO	SO₂	Lead	N/A	Total	Single
0.23	0.23	0.23	1.88	9.90	0.82	0.11	Negligible	-	< 5.04	< 2.43

¹ Fuel Fired Equipment PTE is calculated on unlimited operation when firing natural gas. Surface coating, solvent use, and degreasing unit PTE is based on maximum usage in gallons inherent in the process as presented in the approved potential to emit documents. The PTE includes the VOC and HAP emissions from surface coating operations.

SPECIFIC CONDITIONS

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

SECTION 1: GENERAL APPLICABILITY

1. *Statutory Authority*

Emissions from this facility, specifically the emissions from the equipment described in Attachment 2 of this permit, fall under primary SIC Code 7699 and are subject to enforceable limitations as provided in the Specific Conditions in this permit. This permit is issued pursuant to (ARS) §49-480 and authorizes the construction and/or operation of the equipment enumerated in the “Equipment List” in Attachment 2. This authorization is based on the regulations in effect on the date of issuance of this permit, and a finding that the allowable emissions from this facility constitute an existing "major source" within the meaning of PCC 17.04.340.A.128. Compliance with the conditions of this permit shall be deemed to be compliant with any applicable requirements identified in this permit as of the date of permit issuance. Notwithstanding the above findings, the issuance of this air quality permit shall not relieve the Permittee from compliance with all local, county, state and federal air quality laws, statutes, and codes.

[PCC 17.11.010.B & D, PCC 17.11.090.A, PCC 17.13.010 and ARS §49-480]

2. *Permit Classification*

[PCC 17.04.340.A (41), (134), (175), (221); and PCC 17.11.090]

Class III; True Minor Source; Stationary: The permitted facility sources constitute a stationary true minor source of regulated air pollutants when considering emissions from sources at the facility aggregated under the same primary SIC Code (7699).

3. *Facility Sources*

The Specific Conditions contained in this permit apply to the facility and equipment and/or operations listed in the equipment list in Attachment 2 of this permit that fall under the categories listed below .

- a. Fossil Fuel Fired Industrial and Commercial Equipment [PCC 17.16.165]
- b. Organic Solvents and Surface Coating Operations [PCC 17.16.400]

4. *Permit Sections*

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

- Section 1 – (This Section)
- Section 2 – Facility-Wide Requirements
- Section 3 – Service Center Operations

5. *Applicability of More Than One Standard*

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

[PCC 17.16.010.B]

[Locally Enforceable Condition]

SECTION 2: FACILITY-WIDE REQUIREMENTS

The provisions in this Section apply facility-wide and to all sources of air contaminants. All provisions in this Section are locally enforceable unless otherwise noted. [PCC 17.16.010.B]

Emission Limitations and Standards

[PCC 17.13.020.A.2]

6. *General Control Standards*

a. The Permittee shall not cause or permit the planning, construction, installation, erection, modification, use or operation of an emission source which will cause or contribute to a violation of a performance standard in Title 17 of the Pima County Code. [PCC 17.11.020, 17.13.020A, & PCC 17.16.020.B]

b. The Permittee is prohibited from firing high sulfur oil in any stationary or portable source without submitting a revision, as provided in condition 20 of this Section, demonstrating to the satisfaction of the Control Officer, both that sufficient quantities of low sulfur oil are not available for use by the Permittee, and that the Permittee has adequate facilities and contingency plans to ensure that the sulfur dioxide ambient air quality standards will not be violated. For purposes of this paragraph “high sulfur oil” means oil containing 0.90 percent or more by weight of sulfur. Notwithstanding the prohibition to use high sulfur oil, the Specific Conditions contained in this permit may prescribe lower fuel sulfur content limits for specific stationary or portable sources. [PCC 17.13.020.A.2]

[Material Permit Condition]

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

7. *Materials Handling Standards*

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

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

8. *Odor Limiting Standard*

The Permittee shall not emit gaseous or odorous materials from equipment, operations or premises under his control in such quantities or concentrations as to cause air pollution. Emissions from malodorous matter shall not cross a property line without minimizing the emissions by applying modern practices. Malodorous matter shall include but not be limited to materials in condition 7.b. [PCC 17.16.430.F & PCC 17.16.030]

9. *Opacity Limit*

[PCC 17.16.040, PCC 17.16.050.B, & PCC 17.16.130.B.1]

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

[Federally Enforceable When Opacity Is Above 40%]

- a. Opacities (optical densities), as measured in accordance with Method 9 or as otherwise provided in this permit, of an effluent shall be measured by a certified visible emissions evaluator with his/her natural eyes or with certified equipment, approximately following the procedures which were used during his/her certification, or by an approved and precisely calibrated in-stack monitoring instrument. [PCC 17.16.040.A.1]
- b. A violation of an opacity standard shall be determined by measuring and recording a set of consecutive, instantaneous opacities, and calculating the arithmetic average of the measurements within the set unless otherwise noted in this permit. The measurements shall be made at approximately fifteen-second intervals for a period of at least six minutes, and the number of required measurements shall be as specified in Attachment 4. Sets need not be consecutive in time, and in no case shall two sets overlap. If the average opacity of the set of instantaneous measurements exceeds the maximum allowed by any rule, this shall constitute a violation. [PCC 17.16.040.A.2]
- c. The use of air or other gaseous diluents solely for the purpose of achieving compliance with an opacity standard is prohibited. [PCC 17.16.040.A.3]
- d. When the presence of uncombined water is the only reason for failure of a source to otherwise meet the requirements as specified in conditions 9 and 10, conditions 9 and 10 shall not apply. [PCC 17.16.040.B]

10. *Visibility Limiting Standard*

[PCC 17.16.050]

- a. The Permittee shall not cause, suffer, allow or permit operations or activities likely to result in excessive amounts of airborne dust without taking reasonable precautions to prevent excessive amounts of particulate matter from becoming airborne.
- b. The Permittee shall not cause, suffer, allow, or permit diffusion of visible emissions, including fugitive dust, beyond the property boundary line within which the emissions become airborne, without taking reasonably necessary and feasible precautions to control generation of airborne particulate matter. Sources may be required to cease temporarily the activity or operation which is causing or contributing to the emissions until reasonably necessary and feasible precautions are taken.
 - i. Condition 10.b shall not apply when wind speeds exceed twenty-five (25) miles per hour (using the Beaufort Scale of Wind-Speed Equivalents, or as recorded by the National Weather Service). This exception does not apply if control measures have not been taken or were not commensurate with the size or scope of the emission source.
 - ii. Condition 10.b shall not apply to the generation of airborne particulate matter from undisturbed land.

11. *Asbestos Requirements for Demolition and Renovation Activities*

The Permittee shall not allow or commence demolition or renovation of any NESHAP facility, as defined in 40 CFR Part 61, Subpart M, National Emission Standards for Hazardous Air Pollutants – Asbestos, without first obtaining an activity permit from the Control Officer. Should this stationary source, pursuant to 40 CFR Part 61, Subpart M, become subject to asbestos regulations when conducting any renovation or demolition at this premises, then the Permittee or operator shall submit proper notification as described in 40 CFR Part 61, Subpart M and shall comply with all other applicable requirements of Subpart M. The Permittee shall keep a record of all relevant paperwork on file. [PCC 17.14.060 & 40 CFR 61, Subpart M]

Monitoring Requirements

[PCC 17.13.020.A.3]

12. *Visible Emissions (VE)*

If at any time, or while conducting an opacity check required by the Specific Conditions in this permit, the Permittee sees any plume or effluent from a facility source, that on an instantaneous basis, appears to exceed the opacity limit, or if visible emissions including fugitive dust, diffuse beyond the property boundary line, the Permittee shall investigate the source of the emissions and if required take corrective action. If the plume persists, or the activity or operation which is causing or contributing to the emissions cannot be corrected or halted, the Permittee shall make a visual determination of the opacity in accordance with condition 10 when practicable. If the VE determination exceeds the applicable opacity limit, or if visible emissions, including fugitive dust, diffuse beyond the property boundary line, the Permittee shall report this as an excess emission in accordance with condition 17. [PCC 17.16.040, PCC 17.16.50.B]

13. *Facility-Wide Requirements*

Except as provided in conditions 12 and 22 of this Section or as otherwise contained in the Specific Conditions of this permit, additional monitoring for compliance with the facility-wide requirements shall not be necessary. The Control Officer may ask the Permittee to conduct additional monitoring if the Control Officer has reasonable cause to believe a violation of the facility-wide requirements has been committed.

Recordkeeping Requirements

[PCC 17.13.020.A.4]

14. *Monitoring Records*

[PCC 17.13.020.A.4.a]

The Permittee shall maintain records of required monitoring information. Records shall include at a minimum:

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

15. *Record Retention*

[PCC 17.13.020.4.b]

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

16. *Recordkeeping for Compliance Determination*

[A.R.S.§49-485, PCC 17.11.060, & PCC 17.24.020.A]

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

Reporting Requirements

[PCC 17.13.020.A.5]

17. *Excess Emissions Reporting:*

[PCC 17.13.190]

The Permittee shall report to the Control Officer any emissions in excess of the limits established by this permit in accordance with condition 2 of the General Conditions.

18. *Emissions Inventory Reporting*

[PCC 17.13.180]

When requested by the Control Officer, the Permittee shall complete and submit an annual emissions inventory questionnaire. The questionnaire is due by March 31 or ninety days after the Control Officer makes request and inventory form available, whichever occurs later, and shall include emission information for the previous calendar year. The questionnaire shall be on a form provided by or approved by the Control Officer and shall include the information required by PCC 17.12.320.

19. *Certification of Truth Accuracy and Completeness*

[PCC 17.13.010.H]

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

Facility Changes

20. *Permit Revision Application*

[PCC 17.13.100, PCC 17.13.110, PCC 17.13.120, PCC 17.13.150]

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

21. *Notification*

[PCC 17.13.110.C]

For facility changes that do not require revision, the Permittee may make the changes if written notice is provided to the Control Officer in advance of the changes in accordance with PCC 17.13.110.C.

22. *Facility Change Log*

[PCC17.12.240.B]

The Permittee shall maintain a log of other facility changes that do not require revision or notice in accordance with PCC 17.13.110.B.

Testing Requirements

[PCC 17.11.160, PCC 17.11.210, PCC 17.20.010, 17.20.040]

23. *Test Methods for Demonstration of Compliance*

For purposes of demonstrating compliance with the Specific Conditions in this permit, the testing provisions in this subsection shall be used, provided that for the purpose of establishing whether or not the facility has violated or is in violation of any condition in this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable federal requirements if the appropriate performance or compliance procedures or methods had been performed. Unless otherwise noted, the following test methods and standards are from 40 CFR Part 60, Appendix A or incorporated by reference in 40 CFR §60.17.

a. *Opacity*

When required, the opacity of visible emissions shall be determined by EPA Test Method 9, Appendix A, 40 CFR Part 60 or by EPA approved Alternate Method ALT-082 to monitor compliance with the opacity standards identified in this permit. [PCC 17.11.160.B]

b. *Alternative Test Plan*

The Permittee may submit an alternate and equivalent test method(s) for approval by the Control Officer that is listed in 40 CFR Subpart 60, Appendix A or is approved by the EPA as an alternative test method (See <https://www.epa.gov/emc/broadly-applicable-approved-alternative-test-methods> for a listing of approved alternate test methods).

c. *Fuel Sulfur Limitations*

Documentation, such as invoices or statements from the fuel supplier, showing the fuels delivered and verifying the fuel sulfur content is below applicable standards shall be an acceptable means to demonstrate compliance with fuel limitations identified in this Permit. If otherwise required or when requested by the Control Officer, the fuel sulfur content of fuels shall be determined using ASTM D129, D1266, D1552, D2622, D4294, D5453 or an equivalent for liquid fuels, and ASTM D1072, D3246, D4084, D4468, D4810, D6228, D6667, Gas Processors Association Standard 2377, or an equivalent for gaseous fuels.

d. *Test Protocols and Guidelines*

Except as provided in the Specific Conditions in this permit, should the Permittee desire, or be required, to perform testing to demonstrate compliance with the standards contained in the Specific Conditions of this permit, the Permittee shall contact the Control Officer for test methods, protocols, and guidelines.

e. *Concealment*

The Permittee shall not construct, install, erect, use, replace, modify, or operate an emission source so as to conceal an emission which would otherwise be a violation of a control standard. Concealment shall include:

- i. The use of gaseous diluents to achieve compliance with an opacity standard or with a standards which based on the concentration of a pollutant in the gasses discharged to the atmosphere.
- ii. Operating in a piecemeal fashion to avoid compliance with a standard that would otherwise apply to the source on the basis of its size; and
- iii. Operating in a manner, under conditions, or during such times that emissions cannot be observed.

SECTION 3: SERVICE CENTER OPERATIONS

The provisions in this Section are applicable to the permitted equipment and operations listed in Tables 1 through 3 in Attachment 2 of this permit. All Provisions of this section are locally enforceable unless otherwise noted.

Emission Limitations and Standards

[PCC 17.13.020.A.2]

24. *Heat Cleaning and Bake Ovens*

[PCC 17.16.165]

[Material Permit Conditions]

- a. The Permittee shall combust only the specified fuels in the equipment list in the affected heat cleaning and bake ovens.
- b. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate the affected heat cleaning and bake ovens in a manner consistent with good air pollution control practice and recommendations of the respective manufacturers (where available) for minimizing emissions. Determination of whether acceptable operational 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, opacity observations and inspection of the source.

25. *Organic Solvent and Surface Coating Operations*

[PCC 17.16.400]

- a. The Permittee shall not conduct any spray coating or spray paint operations 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. [PCC 17.16.400.C.1]
- b. 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 Hazardous air Pollutants (HAP) to metal or plastic parts or products, without applying for a permit revision as provided in condition 20 of this permit and submitting an Initial Notification in accordance with 40 CFR Part 63, Subpart HHHHHH to the Control Officer. For the purpose of this provision target HAP are compounds of Chromium (Cr), Lead (Pb), Manganese (Mn), Nickel (Ni), or Cadmium (Cd).
[PCC 17.11.120.A.3.a, PCC 17.16.530.B111, 40 CFR 63.11169 & 40 CFR 63.11180]
[Material Permit Condition]
- c. All VOC containing solvent washings of painting equipment shall be directed into containers that prevent evaporation and emissions to the atmosphere. [PCC 17.16.400.A, PCC 17.16.400.C.1]
- d. Affected solvent degreasing/cleaning units shall be equipped with lids or an equivalently effective system to control evaporation into the atmosphere when not in use. [PCC 17.16.400.A]
- e. 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 applying for a permit revision as provided in condition 20 of this permit. [PCC 17.11.120.A.3.a, NESHAP Subpart T Applicability]
[Material Permit Condition]

Compliance Determination

[PCC 17.13.020.A.3, 4 & 5]

26. Heat Bake/Cleaning Ovens

- a. To demonstrate compliance with the opacity limit in condition 9 of this permit for the affected heat cleaning and bake ovens, the Permittee shall conduct a visible emissions check at least weekly when the equipment is operating. For the purposes of this condition a visible emissions check is verification that abnormal emissions are not present at the equipment stacks or vents. The Permittee shall maintain a record of all emissions check inspections made. If no visible emissions are observed, the records shall state that no visible emissions were observed. The inspection records shall include the monitoring information as provided in condition 14 of this permit including any corrective action or maintenance required on the equipment.
- b. The Permittee shall monitor and maintain a log of the routine and non-routine maintenance performed on the affected heat cleaning and bake ovens to ensure they are maintained and operated in accordance with condition 24.b of this permit. Upon request, the Permittee shall make all maintenance and inspection records available to Control Officer. Determination of whether acceptable 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, and inspection of the source.

27. Organic Solvents and Surface Coating Operations

- a. The Permittee shall maintain documentation demonstrating that enclosed spray paint or surface coating operations meet the overspray control requirements in condition 25 by using filters that have a minimum ASHRAE arrestance rating of at least 96%, or an equivalent system which can be shown to meet the overspray control requirement, and that the enclosure and controls are operated and maintained consistent with manufacturer's guidelines or good engineering practice.
- b. The Permittee shall keep records of the annual amounts of surface coatings and solvents used and maintain a file of the surface coatings and organic solvents, including paints, varnish, diluents (thinners), and cleaning solvents used in organic solvent and surface coating operations covered by this permit that includes at least the following information:
 - i. The product name, product ID number, and the process where used;
 - ii. The MSDS, technical data sheet, test result, or manufacturer's certification; and
 - iii. The VOC and HAP content, and density or specific gravity.

GENERAL CONDITIONS

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

1. *Compliance with Permit Conditions* [PCC 17.13.020.A.7.a & b]
 - a. The Permittee shall comply with all conditions of this permit including all applicable requirements of Arizona air quality statutes and the air quality rules. Any permit noncompliance constitutes a violation of the Arizona Revised Statutes and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application. In addition, noncompliance with any federally enforceable requirement constitutes a violation of the Clean Air Act.
 - b. It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

2. *Excess Emissions, Emergency Reporting* [PCC 17.13.020.A.5 & PCC 17.13.190]

The Permittee shall report to the Control Officer any emissions in excess of the limits established by this permit. The report shall be in 2 parts as specified below:

 - a. Notification by telephone or facsimile within 24 hours of the time the Permittee first learned of the occurrence of excess emission that includes all available information from 17.12.040.B. The number to report excess emissions is **520-724-7400**. The facsimile number is **520-838-7432**.
 - b. Detailed written notification by submission of an excess emissions report within 72 hours of the notification under I.B.1 above. **Send to PDEQ 33 N. Stone Avenue, Suite 700, Tucson, Arizona 85701.**

3. *Property Rights* [PCC 17.13.020.A.7.d]

The permit does not convey any property rights of any sort, or any exclusive privilege to the permit holder.

4. *Fee Payment* [PCC 17.13.020.A.9 & PCC 17.13.240]

The Permittee shall pay fees to the Control Officer pursuant to PCC 17.12.520.

5. *Permit Revision, Reopening, Revocation and Reissuance, or Termination for Cause* [PCC 17.13.020.A.7.c]

The permit may be revised, reopened, revoked and reissued, or terminated for cause pursuant to PCC 17.12.270. The filing of a request by the Permittee for a permit revision, revocation and reissuance, or termination; or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

6. *Duty to Provide Information* [PCC 17.13.010.G & PCC 17.13.020.A.7.e]
 - a. The Permittee shall furnish to the Control Officer, within a reasonable time, any information that the Control Officer may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the Control Officer copies of records required to be kept by the permit. For information claimed to be confidential, the Permittee shall furnish a copy of such records to the Control Officer along with a claim of confidentiality.
 - b. If the Permittee has failed to submit any relevant facts or if the Permittee has submitted incorrect information in the permit application, the Permittee shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.

7. *Severability Clause* [PCC 17.13.020.A.6]

The provisions of this permit are severable. If any provision of this permit is held invalid, the remainder of this permit shall not be affected thereby.

ATTACHMENT 1 – APPLICABLE REGULATIONS**40 CFR, Part 60 Standards of Performance for New Stationary Sources (NSPS)**

Appendix A Test Methods

Title 17, Chapter 17.11 – General Provisions for Permits**Article I – General Provisions**

17.11.010 Statutory Authority
 17.11.020 Planning, Constructing, or Operating Without a Permit

Article II – General Provisions for Stationary Source Permits

17.11.060 Permit Display or Posting
 17.11.120 Material Permit Condition
 17.11.160 Test Methods and Procedures
 17.11.210 Performance tests

Title 17, Chapter 17.13 – Individual and General Permits and Permit Revisions for Class II and Class III Permits**Article I – General Provisions**

17.13.010 Application processing procedures
 17.13.020 Permit Contents

Article II – Permit Revisions, Renewals and Transfers for Class II and Class III Permits

17.13.100 Facility changes that require a revision
 17.13.110 Procedures for certain changes that do not require a permit revision
 17.13.130 Minor revisions
 17.13.140 Significant revisions
 17.13.150 Reopening, revocation, or termination

Article III – Emissions for Class II and Class III Sources

17.13.180 Annual Emissions Inventory Questionnaire
 17.13.190 Excess Emissions Reporting Requirements

Article V – Fees for Class II, Class III, and General Permits

17.13.240 Fees related to Class II and Class III Sources

Title 17, Chapter 17.14 – Activity Permits

17.14.060 Asbestos NESHAP activity permits

Title 17, Chapter 17.16 – Emission Limiting Standards**Article I – General Provisions**

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

Article II – Visible Emission Standards

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

Article IV – New and Existing Stationary Source Performance Standards

17.16.130 Applicability
 17.16.165 Standards of performance for fossil-fuel fired industrial commercial equipment
 17.16.400 Organic solvents and other organic materials
 17.16.430 Standards of performance for unclassified sources

Title 17, Chapter 17.20 – Emissions Source Testing and Monitoring

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

Title 17, Chapter 17.24 – Emission Source Recordkeeping and Reporting

- 17.24.020 Recordkeeping for compliance determination
- 17.24.050 Reporting as a permit requirement

ATTACHMENT 2 – EQUIPMENT LIST

Permitted equipment and operations for which emissions are allowed by this permit are as follows:

Table 1 – Heat Bake/Cleaning Ovens (Ref. Permit Section 3)

Source ID Number	Equipment ID/ Description/ Serial Number	MFR	Model	Capacity	Fuels Allowed	Date of MFR	Date Installed
01	Heat Cleaning Oven CMB1 B080686	Steelman	1011.510 BA-E	2.28 MMBtu	Natural Gas	2009	2009
02	Heat Bake (Curing) Oven CMB2 *	Steelman	121216 GTC	2.0 MMBtu	Natural Gas	TBD	2/26/2018

Table 2 – Surface Coating Operations (Ref Permit Section 3)

Source ID Number	Equipment ID/ Description	Make	Model	Capacity	Allowable Media	Date of MFR	Date Installed
03	Paint Booth SC-1 & 2 96741	Unknown	Unknown	420 gal/yr	Surface Coatings	-	-
04	Organic Solvents and Surface Coating Operations (Includes facility-wide total usage of paints, coatings, varnish, thinners, and solvents, excluding Prime Steam Cleaner Solvent)	-	-	4435 gallons Surface Coatings	Surface Coatings (Paints, Varnish, Adhesives & paint diluents et. al.)	-	-
				880 gallons	GE 1500 Solvent		

Table 3 – Solvent Degreasing/Cleaning Units (Ref. Permit Section 3)

Source ID Number	Equipment ID/ Description	Make	Model	Solvent Media/ Capacity	Date of MFR	Date Installed
05	Solvent Degreasing/Cleaning Unit #1 CLN-1	Safety Kleen	Model 250	Safety Kleen Premium Gold 29 Gallons	-	-

ATTACHMENT 3 - INSIGNIFICANT ACTIVITIES

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

Table 4 –Insignificant activities & operations

Description	Maximum Rated Capacity	Fuels Used
See Additional insignificant equipment & operations (Table 4 on next page).		
Landscaping, building maintenance, or janitorial services.	-	-
Gasoline storage tanks; provided such storage tanks are equipped with a submerged filling device, or acceptable equivalent for the control of hydrocarbon emissions in accordance with PCC 17.16.230.B and not subject to any federally applicable requirements.	≤ 10,000 gallons	Gasoline
Diesel or fuel oil storage tanks	≤ 40,000 gallons	Diesel
Batch mixers.	≤ 5 cubic feet	-
Wet sand and gravel production facilities whose permanent in-plant roads are paved and cleaned to control dust. This does not include activities in emissions units which are used to crush or grind any nonmetallic minerals.	≤ 200 tons/hour	-
Hand-held or manually operated equipment used for buffing, polishing, carving, cutting, drilling, machining, routing, sanding, sawing, surface grinding, or turning of ceramic art work, precision parts, leather, metals, plastics, fiberboard, masonry, carbon, glass or wood.	-	-
Powder coating operations	-	-
Abrasive blasting cabinets; provided they are equipped with filtration control devices		
Internal combustion (IC) engine-driven compressors, IC engine-driven electrical generator sets, and IC engine-driven water pumps used only for emergency replacement or standby service. <i>Note: Portable or temporary IC engines or other non-road engines that operate, or are planned for operation, at a fixed location for more than 12 months are subject to stationary source permitting requirements. Portable or temporary IC located at a facility, may be required to keep records showing when the sources are transferred to or from the facility, or moved to alternate locations at the facility in order to establish that the sources are not stationary IC engines.</i>	-	-
Lab equipment used exclusively for chemical and physical analyses.	-	-
Trivial activities as provided in PCC 17.04.340.A.237 a through xx.	-	-

Table 4 – Additional insignificant activities & operations

Equipment/Source ID Number	Description	Make	Model	Capacity/ Media	Media	Basis for insignificant determination
Metal Spray	-	-	-	-	-	-
MS1	-	-	-	-	-	-
Surface Coating	-	-	-	-	-	No applicable requirements for process units
SC4	VPI Process			730 Gal/yr ¹	Von Roll 707C	3.0 lb. VOC/Gal
SC5	VPI Process 10'			2190 Gal/yr ¹	74033 Varnish	2.1 lb. VOC/Gal
Cleaning						De-minimus @
CLN-3	MART Washer			0.38 MMBtu	ISW-24	No VOC/HAP
CLN-4	Steam Cleaner /w reagents	Landa		1760 Gal/yr	Prime Cleaning Solvent	0.26 lb. VOC/Gal (0.2 tpy VOC)
Abrasive Blasting						De-minimus
Periodic Enclosed Abrasive Blasting Operations						De-minimus @ 0.58 tpy HAP
ABR2	Glove blast unit					De-minimus
Combustion Units						De-minimus
CMB 3	Bake Oven	Steelman	568GS	0.40 MMBtu	Gas	< 0.5 MMBtu
CMB 4	Steam Cleaner	Linda		0.35 MMBtu	Gas	< 0.5 MMBtu
CMB 5	MART Washer			0.35 MMBtu	Gas	< 0.5 MMBtu
CMB 6	Hot Water Heater			0.20 MMBtu	Gas	< 0.5 MMBtu
CMB 7-18 (CMB9 Removed from service)	Space Heaters			12 @ ~ 0.10 MMBtu	Gas	Comfort Heat
CMB 19-22	Cutting Torches (4)	Belchfire		0.61 MMBtu ea.	Gas	De-minimus
CMB 23	Portable Diesel Generator			91 Hp	Diesel	Portable & < 325 Hp

¹ Coating and solvent throughput for these operations are covered by the permit under the organic solvent and surface coating operations.

Table 4 – Additional Insignificant activities & operations (Continued)

Equipment/Source ID Number	Description	Make	Model	Capacity/ Media	Media	Basis for insignificant determination
Welding		-	-	78,000 lbs/yr	E70S	De-minimus @ .12 tpy HAP/PM
Banding / Soldering				876 lb/yr	Solder	De-minimus @ .04lb/yr HAP/PM
Miscellaneous Units						
MSC1	Stress Relief Oven	-	-	-	-	No Emissions
MSC2	Small Electric Oven					No Emissions
MSC3	2 Welding Rod Ovens					No Emissions
MSC4	Bandsaw, Belt Sander					Negligible
MSC5	Banding Machine Exhaust					De-minimus
MSC6	2 Saws, Belt Sander					Negligible

ATTACHMENT 4

EMISSIONS DISCHARGE OPACITY LIMITING STANDARDS

PCC 17.16.040

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

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

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

³ Applicable to a diesel engine being accelerated under load.

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

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