

## STANDARD PERMIT APPLICATION FORM FILING INSTRUCTIONS

FILING INSTRUCTIONS (All references are to Title 17 of the Pima County Code unless otherwise noted – [www.deq.pima.gov](http://www.deq.pima.gov) - “Regulations” – “Title 17”): These directions are to be used in conjunction with the "Standard Permit Application Form" and may be used for new source permits, renewal permits for existing sources, and permit revisions.

The Standard Permit Application Form and filing instructions are designed to assist the applicant in providing the information which will allow Pima County Department of Environmental Quality (PDEQ) to determine the applicable regulations, determine if standards will be met, and determine which fees apply. No application shall be considered complete until the Control Officer has determined that all information required by this application form (17.12.160 & AAC 18-2 Appendix 1) and the applicable statutes and regulations has been submitted.

For permit revisions, (17.12.230 through 17.12.260) the applicant need only supply information that directly pertains to the revision and changes in emissions unless it is a “Significant” revision that will change a class II/ III to a Class I source. Justification from the applicant shall be provided to show that the “...proposed revision meets the criteria for use of minor permit revision procedures and a request that such procedures be used.” The Control Officer may waive certain application requirements for specific source types pursuant to 17.12.160(B). The Control Officer has developed special guidance documents and forms to assist certain sources requiring Class II permits in completing the application form and filing instructions. Guidance documents and assistance in completing the application form(s) are available by calling PDEQ’s Business Assistance representative at (520) 243-7400.

For General Permits, see [www.adeq.gov](http://www.adeq.gov); Air Quality; Permits; Permit Applications. Please note, although some General Permits are issued by the Arizona Department of Environmental Quality (ADEQ), the application is to be sent to PDEQ for processing and issuance of the Authority to Operate (ATO) under the General Permit guidelines, provided that the source will operate solely within Pima County for the duration of the permit period. If a source expects to operate outside Pima County, contact ADEQ for permit jurisdiction

## SUBMITTING A COMPLETE PERMIT APPLICATION

These directions are to be used in conjunction with the "Standard Permit Application Form" and the "Standard Permit Application Form Filing Instructions" contained in this application package. These directions may be used for new source permits, renewal permits for existing sources, and permit revisions. You may obtain help in completing these forms by contacting the Pima County Department of Environmental Quality's (PDEQ) Business Assistance Program representative at (520) 243-7400.

The application form and filing instructions are designed to assist the applicant in providing the information which will allow PDEQ to determine the applicable regulations, determine if standards will be met, and determine which fees apply.

### **Reference the Standard Permit Application Form:**

PDEQ requires all applicants to submit the Standard Permit Application Form. Items #1 through #5 of the application are self-explanatory.

Item #6 asks for the Plant/Site Manager or Contact Person. This should be the person who is responsible for implementing the permit at the facility and the person PDEQ may contact for additional information.

Item #7 requests the current or proposed location of the facility. If the application is for a portable plant, a Move Notice Form must be completed and returned to PDEQ each time the plant is moved. This form is available by contacting PDEQ.

Item #8 asks for the general nature of the business. Your response should be in terms of what is produced at the plant. The Standard Industrial Classification Code is a number which describes the type of facility and may be obtained by calling PDEQ. The State Permit Class is the class of permit which was issued to the facility previously and may be obtained by calling PDEQ.

Under Item #9, if the "Other" box is checked, please be specific as to what the organization is.

Item #10, Permit Application Basis, indicates what type of permit is necessary. If the facility is already permitted and is applying for a permit revision or renewal, then the current permit number must be included. The Date of Commencement of Construction or Modification is the expected date that construction will begin. If there is any chance that the equipment will be leased out, answer "yes" to the last part of Item #10. If you check "no", the permit may contain a condition which prohibits leasing of the equipment; changing that condition will require a permit revision.

The "Responsible Official" referred to in Items #11 & #12 is the owner or a partner of the company in most cases. It may also be the person responsible for environmental compliance. If there is a question as to who the responsible official is, contact PDEQ.

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In addition to the information required on the Standard Permit Application form, the applicant shall supply the following:

1. Description of the process to be carried out in each unit.
2. Description of raw materials, intermediates, and product(s) (including fuels, solvents, etc).
3. Description of alternate operating scenario, if desired by applicant (include Source Classification Code if different from SIC code in Item #8). PDEQ allows applicants to submit alternate operating scenarios to allow for operational flexibility.
  - The alternate operating scenario is incorporated into the permit and allows operational changes to be made without a permit revision
  - The source need not contact PDEQ to switch to an alternate operating scenario, but must keep a record. Examples include:

- Changes in fuels
  - Changes in solvents
  - Equipment configurations
  - Products
  - Raw Materials
- The application must include for each scenario:
- Additional regulations which apply to the scenario
  - Process description
  - Process flow diagram
  - Difference in PTE (If applicable)
4. Description of alternate operating scenario product(s), if applicable.
5. A flow diagram for all processes.
6. A material balance for all processes (optional, only if emission calculations are based on a material balance)
7. Emissions Related Information:
- a. The source shall be required to submit the potential emission rate of regulated air pollutants as defined in 17.04.340.A.164 & 182, respectively, for all emission sources. Emissions shall be expressed in pounds per hour, tons per year, and such other terms as may be requested. Emissions shall be submitted using the standard "Emission Sources" form contained in the "Standard Permit Application" and the emission point name and number should correspond to the site diagram. Emissions information shall include fugitive emissions in the same manner as stack emissions, regardless of whether the source category in question is included in the list of sources contained in the definition of major source in 17.04.340.A.122.
  - b. The source shall be required to identify and describe all points of emissions and to submit additional information related to the emissions of regulated air pollutants sufficient to verify which requirements are applicable to the source and sufficient to determine any fees owed under the fee schedule.
  - c. Calculating emissions may be done several ways
    - EPA's "Compilation of Air Pollutant Emission Factors", also known as AP42 ([www.epa.gov/ttn/chief/index.html](http://www.epa.gov/ttn/chief/index.html) - Choose "Emission Factors," "AP-42, Compilation of Air Pollution Emission Factors.")
      - most commonly used and always accepted
      - generally does not include HAPs emissions
      - generally does not speciate VOCs
    - Emission tests from the actual plant (emission tests from a similar plant may be acceptable in some cases)
    - Other published studies provided conditions are similar (will most often be used to estimate HAPs)
    - Engineering calculations such as a material balance

- Include all information and references used to estimate emissions (PDEQ prefers copies of the references used)
  - d. Emissions for alternate operating scenarios are required.
    - PDEQ may accept emissions from the scenario with the highest emission rate
    - All possible compounds which may be emitted must be listed
      - For example, if the applicant wants to be permitted to use two different equipment configurations which cause the same type of pollutants to be emitted but at different rates, only the higher emissions need to be submitted. However, if the applicant wants to be permitted to use two different types of solvents, emissions from both solvents must be included.
  - e. Fugitive emissions – Include length and width of the areas which contribute to fugitive emissions.
8. Citation and description of all applicable requirements as defined in 17.04.340.A.25.  
[e.g. - Applicants must list all federal and state requirements which may apply to the source - 17.16.130 through 17.16.520] These may include:
- Federal New Source Performance Standards (NSPS)
  - PSD/NSR permit requirements

- Testing requirements (including test methods; a previous permit should specify the testing requirements) [17.12.030 through 150 & 17.16...]
- Monitoring requirements (usually for larger sources) [17.12.180(A)(3) & 17.16...]
- Hazardous Air Pollutant (HAP) requirements [17.16.645 through 710 – Art. IX]
- Acid Rain Program requirements [17.12.365 & CAA]
- State statutes and regulations [ARS 49.471 et al]
- County code [Title 17]

9. An explanation of any proposed exemptions from otherwise applicable requirements.

Proposed exemptions may include, but are not limited to:

- Generators with an aggregated rating of less than 244KW (325 HP) may be exempt from permitting
- Fuel burning equipment with an aggregated rating under 500,000 BTU per hour may be exempt from permitting

"Insignificant Activities" are exempt from permitting. These may include:

- Laboratory activities
- Building maintenance
- Some small petroleum liquid storage tanks

Note: Insignificant activities must be listed in the application but the associated emissions or equipment details need not be included.

10. The following information to the extent it is needed to determine or regulate emissions:

- a. Maximum annual process rate (actual) for each piece of equipment that generates air emissions.
- b. Maximum annual process rate (actual) for the whole plant.
- c. Maximum rated hourly process rate (potential) for each piece of equipment that generates air emissions.
- d. Maximum rated hourly process rate (potential) for the whole plant.
- e. For all fuel burning equipment including generators, a description of fuel use, including the type used, the quantity used per year, the maximum and average quantity used per hour, the percent used for process heat, and higher heating value of the fuel. For solid fuels and fuel oils, state the potential sulfur and ash content.
- f. A description of all raw materials used and the maximum annual and hourly, monthly, or quarterly quantities of each material used.
- g. Anticipated Operating Schedules
  - i. Percent of annual production by season.
  - ii. Days of the week normally in operation.
  - iii. Shifts or hours of the day normally in operation.
  - iv. Number of days per year in operation.
- h. Limitations on source operations and any work practice standards affecting emissions.

11. A description of all process and control equipment for which permits are required including:

- a. Name.
- b. Make (if available).
- c. Model (if available).
- d. Serial number (if available).
- e. Date of manufacture (must provide best estimate if date unknown).
- f. Size/production capacity.
- g. Type.

Note: Not all of the above information will be available to the applicant upon submitting an application. In such a case, the application should include at least the type and the anticipated capacity of the equipment and an estimate of the date of manufacture. If actual capacities, controls or other information are significantly different, notification shall be submitted to PDEQ as soon as they become known.

12. Stack Information:

- a. Identification.
- b. Description.
- c. Building Dimensions.
- d. Exit Gas Temperature.

- e. Exit Gas Velocity.
- f. Exit height above ground.
- g. Exit height above building.
- h. Inside Dimensions.

13. Site diagram that includes:

- a. Property boundaries.
- b. Adjacent streets or roads.
- c. Directional arrow.
- d. Elevation.
- e. Closest distance between equipment and property boundary.
- f. Equipment and building layout.
- g. Building height
- h. Relative location of emission sources/points.
- i. Location of emission points and non-point emission areas.
- j. Location of air pollution control equipment.
- k. Scale (PDEQ will accept diagrams which are not scaled, but all dimensions must be shown)

14. Air Pollution Control Information:

- a. Description of or reference to any applicable test method for determining compliance with each applicable requirement.
- b. Identification, description and location of air pollution control equipment, including, but not limited to, spray nozzles, hoods, fabric filters, scrubbers, cyclones, afterburners, water trucks, and compliance monitoring devices or activities.
- c. The rated and operating efficiency of air pollution control equipment. (rated efficiency should be available from the manufacturer)
- d. Data necessary to establish required efficiency for air pollution control equipment (e.g. air to cloth ratio for bag houses, pressure drop for scrubbers, minimum operating temperature for thermal oxidizers and warranty or manufacturer guarantee information).
- e. Evidence that operation of the new or modified pollution control equipment will not violate any ambient air quality standards, or maximum allowable increases under 17.08.150.

15. Equipment manufacturer's bulletins or shop drawings are acceptable for the purposes of supplying the information required by any item in numbers 11, 12 or 14 of these filing instructions.

16. Compliance Plan [17.12.160(B)(2)]:

- a. A description of the compliance status of the source with respect to all applicable requirements including, but not limited to:
  - i. A demonstration that the source or modification will comply with the applicable requirements contained in Chapter 17.04.
  - ii. A demonstration that the source or modification will comply with the applicable requirements contained in Chapter 17.08.
  - iii. A demonstration that the source or modification will comply with the applicable requirements contained in Chapter 17.12.
  - iv. A demonstration that the source or modification will comply with the applicable requirements contained in Chapter 17.16.
  - v. A demonstration that the source or modification will comply with the applicable requirements contained in Chapter 17.20.
  - vi. A demonstration that the source or modification will comply with the applicable requirements contained in Chapter 17.24.
  - vii. A demonstration that the source or modification will comply with the applicable requirements contained in Chapter 17.28.
- b. A compliance schedule as follows:
  - i. For applicable requirements with which the source is in compliance, a statement that the source will continue to comply with such requirements.
  - ii. For applicable requirements that will become effective during the permit term, a statement that the source will meet such requirements on a timely basis. A statement

that the source will meet in a timely manner applicable requirements that become effective during the permit term shall satisfy this provision, unless a more detailed schedule is expressly required by the applicable requirement.

- iii. A schedule of compliance for sources that are not in compliance with all applicable requirements at the time of permit issuance. Such a schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with any applicable requirements for which the source will be in noncompliance at the time of permit issuance. This compliance schedule shall resemble and be at least as stringent as that contained in any judicial consent decree or administrative order to which the source is subject. Any such schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based.
- c. A schedule for submission of certified progress reports no less frequently than every 6 months for sources required to have a schedule of compliance to remedy a violation.
- d. The compliance plan content requirements specified in this paragraph shall apply and be included in the acid rain portion of a compliance plan for an affected source, except as specifically superseded by regulations promulgated under Title IV of the Act with regard to the schedule and method(s) the source will use to achieve compliance with the acid rain emissions limitations.

17. Compliance Certification [17.12.210(A)(2)(c)]: A certification of compliance with all applicable requirements, including voluntarily accepted limitations pursuant to 17.12.220, by a responsible official consistent with 17.12.160(B)(2) for new sources, and 17.12.160(B)(2) and 17.12.210(A)(2)(c) for existing sources. The certification shall include:

- a. Identification of the applicable requirements that are the basis of the certification
- b. A statement of methods used for determining compliance, including a description of monitoring, record keeping, and reporting requirements and test methods
- c. A schedule for submission of compliance certifications during the permit term to be submitted no less frequently than annually, or more frequently if specified by the underlying applicable requirement or by the permitting authority; and
- d. A statement indicating the source's compliance status with any applicable enhanced monitoring and compliance certification requirements.
- e. A certification of truth, accuracy, and completeness pursuant to 17.12.160.H.

18. Acid Rain Program Compliance Plan: Sources subject to the Federal acid rain regulations shall use nationally standardized forms for acid rain portions of permit applications and compliance plans, as required by regulations promulgated under Title IV of the Act and incorporated pursuant to 17.12.365.

19. A new major source as defined in 17.12.340.A.122 or a major modification shall submit all information required in these filing instructions and information necessary to show compliance with Chapter 17.16, Article VIII, including, but not limited to:

- a. For sources located in a Non-Attainment Area:
  - i. In the case of a new major source as defined in 17.04.340.A.122 or a major modification subject to an emission limitation which is LAER (Lowest Achievable Emission Rate) for that source or facility, the application shall contain a determination of LAER that is consistent with the requirements of the definition of LAER contained in 17.04.340.A.120. The demonstration shall contain the data and information relied upon by the applicant in determining the emission limitation that is LAER for the source or facility for which a permit is sought.
  - ii. In the case of a new major source as defined in 17.04.340.A.122 or a major modification subject to the certification requirement of 17.16.560.A.2, the applicant shall submit such certification in a form that lists and describes all existing major sources owned or operated by the applicant and a statement of compliance with all conditions contained in the permits or conditional orders of each of the sources.
  - iii. In the case of a new major source as defined in 17.04.340.A.122 or a major modification subject to the offset requirements described in 17.16.560.A.3, the applicant shall demonstrate the manner in which the new major source or major modification meets the requirements of 17.16.570.

- iv. An applicant for a new major source as defined in 17.04.340.A.122 or a major modification for volatile organic compounds or carbon monoxide (or both) which will be located in a nonattainment area for photochemical oxidants or carbon monoxide (or both) shall submit the analysis described in 17.16.560.B.
- b. For sources located in an Attainment Area:
  - i. A demonstration of the manner in which a new major source or major modification which will be located in an attainment area for a pollutant for which the source is classified as a major source as defined in 17.04.340.A.122 or the modification is classified as a major modification will meet the requirements of 17.16.590.
  - ii. In the case of a new major source as defined in 17.04.340.A.122 or major modification subject to an emission limitation which is BACT (Best Available Control Technology) for that source or facility, the application shall contain a determination of BACT that is consistent with the requirements of the definition of BACT contained in 17.04.340.A.35. The demonstration shall contain the data and information relied upon by the applicant in determining the emission limitation that is BACT for the source or facility for which a permit is sought.
  - iii. In the case of a new major source as defined in 17.04.340.A.122 or major modification required to perform and submit an air impact analysis in the form prescribed in 17.16.600, such an analysis shall meet the requirements of 17.16.590. Unless otherwise exempted in writing by the Director, the air impact analysis shall include all of the information and data specified in 17.16.600.
  - iv. If an applicant seeks an exemption from any or all of the requirements of 17.16.590, the applicant shall provide sufficient information and data in the application to demonstrate compliance with the requirements of the subsection(s) under which an exemption is sought.

20. Calculations on which all information requested in this application are based.

Note: Applicants are legally required to correct any incomplete or incorrect information submitted in the application as soon as discovered.