# PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY Air Program

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

# GENERAL AIR QUALITY PERMIT 6205

# FOR

# FUEL BURNING EQUIPMENT (Boilers, Heaters, and Generators)

# **APPLICATION PACKAGE**

### **INTRODUCTION**

The Pima Country Department of Environmental Quality (PDEQ) has created this general air quality permit (GP) and application package for those sources that may be required to obtain a permit in accordance with PCC <u>17.11.090</u>.B.2, and/or B.3.a, b, or c and consist of combinations of industrial, commercial, and institutional boilers, heaters, other fuel fired equipment, and generators (hereinafter designated internal combustion engines 'ICE or 'RICE') that are subject to NSPS or area source NESHAP rules, and may also include ancillary operations and activities.

The general permit does not apply to a Class I source as defined in PCC <u>17.11.090.B.1</u> and imposes permit-wide limits on usage and fuels, that assure that the "source" remains a non-major source with emission rates below the major source thresholds for criteria and hazardous air pollutants, and/or to avoid triggering other applicable requirements. In order to qualify for coverage, the permitted emissions must be below the following emission limits:

Maximum Permitted Emission Limits ( Controlled Potential to Emit, tons/year)								
Conventional or Criteria Air Pollutant HAP(s)							HAP(s)	
PM2.5	PM10	PM	NOx	VOC	СО	SO <sub>2</sub>	Lead	Total
< 90	< 90	< 90	< 90	< 90	< 90	< 90	< 0.6	< 10

Table 1: Emission Limitation
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If the applicant is required to obtain a permit under Title IV of the Act (Acid Deposition Control) or Title V of the Act (Permits), or if the applicant does not meet the application criterion (as determined in <u>Steps 1 and 2</u> of Application instructions) in this application packet, the applicant may not be eligible for coverage under this general permit. The Control Officer reserves the right to review the eligibility for coverage under this permit, and to make determinations of any ancillary activities/and or processes at a facility, as insignificant activities as defined in Title 17, develop additional attachments, and/or require an applicant to apply for an individual air quality permit.

This GP will streamline the permitting process for numerous sources which would otherwise require substantially similar individual source permits. This action shall reduce PDEQ's workload and afford decreased permitting timeframes. To obtain an *Authorization To Operate (ATO)* for coverage under the GP, an applicant shall complete the attached general permit application forms, and submit a completed PTE spreadsheet for the sources at the facility.

This application package has been created to aid the applicant in submitting an application for this general permit. Applicants must complete and submit this package and pay an application fee in the form of a check or money order payable to PDEQ in the amount of \$540. The applicant can also arrange to pay the application fee by phone, at any time during the process (maximum of 60 days). Please mail the application package and applicable fee or call to arrange for payment to:

#### Pima County Department of Environmental Quality – Air Program 33 N. Stone Avenue, Suite 700 Tucson, AZ 85701

#### Office Phone: 724-7400 || E-mail: <u>air.permits@pima.gov</u>

If the applicant does not have access to a computer, to fill out and return the application and PTE spreadsheet by E-mail, please call or contact PDEQ to obtain a set of manual forms and/or request or schedule a business assistance meeting by phone or in person. If, after reviewing this package in its entirety, the applicant has any questions regarding the application process, please do not hesitate to contact us at the above addresses.

#### DISCLAIMER

Completion of this application package does not void the right of the Control Officer under PCC <u>17.13.010</u> of the Pima County Code (PCC) to require the applicant to provide supplemental information before processing the application and issuing or denying an Authorization to Operate (ATO) under this General Permit.

#### **APPLICATION INSTRUCTIONS**

#### **Step 1:** Applicability: Determine whether or not you need a permit for the source.

The source is required to obtain a permit if <u>any</u> of the following is true:

- The owner or operator commences construction of, operates, or modifies ICE that in the aggregate at a source exceeds 325 HP (i.e. ICE 1 + ICE 2 + ... ICE x > 325 HP).
- The owner or operator commences construction of, operates, or modifies boilers, heaters, or fuel burning equipment that in the aggregate at a source exceeds a capacity of 10 MMBtu/hr.
- The owner or operator commences construction of, operates, or modifies a single boiler with a maximum design heat input capacity greater than 10 MMBtu but less than 100 MMBtu.
- The owner or operator commences construction of, operates, or modifies any source (total of equipment, operations, & activities) that emits or has the potential to emit, without controls, significant quantities of regulated pollutants. (See definition "Significant" in Title 17 (for conventional pollutants: PM 25 tons/yr, PM<sub>10</sub> 15 tons/yr, VOC 40 tons/yr, NO<sub>X</sub> 40 tons/yr, SO<sub>2</sub> 40 tons/yr, CO 100 tons/yr, and Lead 0.6 tons/yr). Proceed to steps 4 and 5 to list equipment processes, and provide the potential to emit (PTE).
- The owner or operator is required to obtain a permit as an area source under Section 111 or 112 of the Act.

# Step 2: Qualification for Coverage: Determine if the facility requires a permit and meets the qualifications for coverage.

Complete the questionnaire in <u>Attachment 1</u> to determine if the source requires a permit and if the fuel fired equipment and ancillary operations and activities at the source qualify for coverage.

#### Step 3: Complete and sign the STANDARD PERMIT APPLICATION FORM.

The applicant shall submit the Standard Application in <u>Attachment 2</u> and supply all information required in accordance with PCC <u>17.13.080</u> & PCC <u>17.13.010</u>. Items 1 through 6 of the Standard Application Form are fairly self-explanatory. The rest are explained below in detail:

- Item #7 asks for the Plant Site Manager or Contact Person. This should be the person that the PDEQ may contact for additional information.
- Item #8, the "General Nature of Business" should describe the primary activity the plant is engaged in. It is important to provide the standard industrial classification code as this is necessary to determine applicability for certain regulations. The permit class is a Class II/III permit by default.
- Under Item #9, if the "other" box is checked, please be specific as to the type of organization.
- Item #10 asks for the Permit Application Basis, which indicates what type of permit is necessary.

The following steps should be utilized when filling out Item #10:

- If the equipment has never been previously permitted or not yet constructed, the box titled "New Source" should be checked.
- If the equipment is already permitted, the box titled "Renewal of Existing Permit" should be checked and the current ATO number must be included on the line titled "For renewal or modification, include existing permit number".
- If the application is for new or renewal coverage under the general permit, the box titled "General Permit" should be checked.

- For new sources the "Date of Commencement of Construction or Modification" is the expected date that construction will begin or the date the engine is ordered. For existing sources this date need not be defined.
- The "Responsible Official" referred to in Item #11 is the owner or a partner of the company in most cases. He or she may also be the president or vice-president of larger companies. If there is a question as to who the responsible official is, refer to PCC <u>17.04.340.A (200)</u>.

#### **Step 4:** Complete the equipment list.

Attachment 3 of this application packet is used to provide a list of all fuel fired equipment (Boilers, Heaters, ICE) and ancillary operations or activities located at the facility. The list needs to include the type of equipment, make, model, maximum rated capacity, serial number, manufacture date, and equipment identification number (if available) for each piece of equipment. The complete submittal of all requested information concerning equipment details will reduce processing time. For the purpose of a complete list of equipment and to determine the PTE in step five, below, the applicant should list all stationary internal combustion engines and all stationary fuel burning equipment that in the aggregate at a facility exceeds 500,000 Btu/hr, except any "insignificant activities" or "trivial activities" in accordance with PCC 17.04.340.A (114 & 237). For individual natural gas fired units not included on the equipment list, those units with a firing capacity of less than 1 MMBtu/hr shall be considered to be insignificant, unless otherwise determined by the Control Officer following inspection of a source. In some cases, the equipment may not have been purchased by the time of application submittal. In such case, the serial number may not be listed, but an equipment identification number will still need to be provided. The equipment must be marked with a unique clearly visible and accessible ID to identify the piece of equipment before such equipment is installed. The ID can be the serial/tag number from manufacture, or if not available a stenciled marking, should be provided to identify the Equipment ID # to the equipment listed on the ATO.

Should the applicant have other ancillary air polluting operations or if determinations may be required by the Control Officer for coverage under the GP, please list such operations and requirements under <u>Attachment 4</u>, and attach any applicable emission estimates or other support information for review by the Control Officer. *Note: The Control Officer reserves the right to review the application for eligibility for coverage under the GP, to make determinations of any ancillary activities/and or processes at a facility to be insignificant activities as defined in Title 17, to develop additional attachments for specific operations, and/or deny coverage under the GP and require an individual air quality permit.* 

#### **Step 5: Estimate the potential to emit (PTE).**

The sheets (Tables) in the supplemental excel spreadsheet have been created to assist the applicant in determining the potential amount of regulated air pollutants emitted by the plant, as well as establishing any hourly limitations required for the equipment or operations (if applicable). The emissions calculated in the tables are to assist in estimating the PTE. The emission factors used are based on the Environmental Protection Agency's (EPA) Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition.

If the applicant does not have access to a computer, to fill out and return the application and PTE spreadsheet by E-mail, please call or contact PDEQ to obtain a set of manual forms and/or schedule a business assistance meeting appointment by phone or in person (See address and Contact information above).

A copy of the Excel spreadsheet is available at the following address: [PTE Spreadsheet]

#### Step 6: Complete the 'Compliance Certification'.

The compliance certification form which is attached to the Standard Permit Application Form, must be filled out and signed by the Responsible Official (this is the same person that signs the standard permit application form).

#### Step 7: If the applicant is applying for a new source, provide some additional information.

For new sources, in order to facilitate the application process, the following additional information may be required and should be attached to the application if readily available (<u>Attachment 5</u>).

- A map of the current location, depicting the plant perimeter and point of entry should be provided with the application for new sources. This may be a city map, topographical map or any map, which clearly shows the location. Please mark the location of the plant on the map and include driving directions to the plant site from the nearest highway.
- A description of the plant and its processes should be provided with the application. A process description is a brief description of the facility i.e. what the boiler(s) and emergency internal combustion engine(s) are used for.
- If, available, it is helpful to include photos of the engine/boiler name plate and/or provided EPA certification documents that the engine or boiler meets certain standards or emission limits from the manufacturer.

#### **Step 8:** Pay the applicable filing fees.

An application fee of **\$540** must be submitted by applicants applying for coverage under the general permit.

Please make your check or money order payable to the Pima County Department of Environmental Quality (PDEQ). The applicant may also call the service desk at the department and arrange for payment by phone or online as available. In addition to the application filing fee, Permittee's are required to pay an annual fee in accordance with PCC <u>17.13.250</u> which is invoiced separately.

#### **Step 9:** File the application.

The permit application can be submitted via email to PDEQ at the following address:

#### Air.permits@pima.gov

Alternately, the application packet and fee may be mailed to the following address:

#### Pima County Department of Environmental Quality Air Program 33 N. Stone Avenue, Suite 700 Tucson, AZ 85701

If, after reviewing this package in its entirety, the applicant has questions regarding the application process, they may be directed to PDEQ in writing at the above address or by telephone to: (520) 724-7400.

### ATTACHMENT 1: APPLICABILITY QUESTIONNAIRE

#### **INTERNAL COMBUSTION ENGINE(S) 'ICE' CAPACITY:**

1. Does or will the facility have installed stationary ICE with a combined horsepower (HP) greater than 325 HP?

 $\Box$  YES  $\Box$  NO

If the answer is YES:You are required to obtain a permit; Proceed to <u>question 2</u>.If the answer is NO:Proceed to <u>question 4</u>.

- 2. Does the facility operate any non-emergency engines that commenced construction or modification before June 12, 2006 that meet any of the following criteria? Note:
  - **a.** The non-emergency engine combusts diesel, is greater than 500 HP, and does not meet the emissions standards in Table 1 of <u>40 CFR 89.112</u> for Tier 3 engines (Tier 2 for engine power > 560kw or 750 HP).
  - **b.** The non-emergency engine combusts gasoline or gaseous fuel, is a four-stroke rich-burn (4SRB) or fourstroke lean-burn (4SLB) engine, is greater than 500 HP, and is not "remote" see definitions in <u>40 CFR</u> <u>63.6675</u>

 $\Box$  YES  $\Box$  NO

If the answer is YES:You may not qualify for the GP, Contact PDEQ for permitting requirements.If the answer is NO:Proceed to <u>question 3</u>.

**3.** If the facility operates engines that are required to limit their hours of operation are they equipped with a non-resettable run hour meter?

 $\Box$  YES  $\Box$  NO

If the answer is YES:	Proceed to <u>question 4</u> .
If the answer is NO:	The applicant must agree to one of the following:

Does the applicant have the ability to measure the amount of fuel purchased for use in the individual unit, and does the applicant agree to maintain a daily fuel log and record the 12-consecutive month total fuel used in the individual unit?

 $\Box$  YES  $\Box$  NO

Does the applicant have the ability to measure the daily startup and shutdown time for the individual unit, and does the applicant agree to maintain a daily operation log and record the 12-consecutive month total run hours for the individual unit?

 $\Box$  YES  $\Box$  NO

## **BOILERS, HEATERS, AND OTHER FUEL FIRED EQUIPMENT CAPACITY:**

4. Does or will the facility have a combination of stationary boilers, heaters, and other fuel fired equipment that has a combined maximum heat input capacity greater than 10 million Btu/hr (10 MMBtu/hr).

 $\Box$  YES  $\Box$  NO

If the answer is YES:You may be required to obtain a permit, proceed to <u>question 5</u>.If the answer is NO:Proceed to <u>question 7</u>.

5. Does or will the facility have any boilers with maximum heat input capacity greater than 100 MMBtu/hr.

 $\Box$  YES  $\Box$  NO

If the answer is YES:You may not qualify for the GP, Contact PDEQ for permitting requirements.If the answer is NO:Proceed to <u>question 6</u>.

6. Does or will the facility have any boilers, heaters, or other fuel oil fired equipment that fire any fuel other than natural gas, LPG (Propane or Butane), or "distillate" fuel oil containing less than 0.5% by wt. Sulfur?

 $\Box$  YES  $\Box$  NO

If the answer is YES:You may not qualify for the GP, Contact PDEQ for permitting requirements.If the answer is NO:Proceed to <u>question 7</u>.

## **OTHER ACTIVITIES AND OPERATIONS (AS APPLICABLE):**

7. Does or will the facility have more than 1 acre of open areas, including unpaved roadways, which have the potential to generate airborne particulates or fugitive dust?

 $\Box$  YES  $\Box$  NO

**If the answer is YES:** Attachment 1 to the ATO – Fugitive Dust Requirements shall apply. Proceed to **question 8**.

- 8. Does or will the facility operate boilers that are operated as oil fired boilers (i.e. that only combust fuel oil or combust fuel oil during periods other than for startup, testing, or only when the supply of natural gas has been curtailed)?
  - $\Box$  YES  $\Box$  NO

If the answer is YES: Attachment 2 to the ATO – NESHAP Subpart JJJJJJ for Oil fired boilers shall apply. Proceed to question 9.

- **9.** Does or will the facility store gasoline in storage tanks, reservoirs, or other containers greater than 250 gallons, but less than 40,000 gallons with a throughput greater than 1000 gallons/month and/or operate gasoline dispensing facilities with a combined throughput greater than 1000 gallons/month?
  - $\Box$  YES  $\Box$  NO

If the answer is YES: Attachment 3 to the ATO – Gasoline Fuel Storage and Dispensing Requirements shall apply.

Proceed to **question 10**.

**10.** Does or will the facility conduct surface coating operations with a throughput in excess of 320 gallons of surface coatings and solvents per year combined?

□ YES □ NO	If yes, what are the average gallons/yr used? gallons
If the answer is YES:	Attachment 4 to the ATO - Surface Coating and Abrasive Blasting requirements

shall apply.

Proceed to **<u>question 11</u>**.

11. Does or will the facility conduct or perform paint stripping operations that involve the use of methylene chloride (MeCl, CAS 75092); or

Except for facility maintenance, does or will the facility conduct spray application of coatings that contain target Hazardous Air Pollutants to metal or plastic parts or products. For the purpose of this paragraph, target HAP are compounds of Chromium (Cr), Lead (Pb), Manganese (Mn), Nickel (Ni), or Cadmium (Cd). Spray application means the use of a hand held device with a paint cup capacity that is greater than 3.0 fluid ounces.

 $\Box$  YES  $\Box$  NO

If the answer is YES: Please submit an Initial Notification as required by 40 CFR 63.11175 and comply with the requirements of NESHAP Subpart HHHHHH immediately upon startup of operations, as applicable. The Control Officer may develop an additional attachment to the ATO with Specific Conditions to comply with the applicable requirements. Proceed to **question 12**.

**12.** Is the potential to emit (PTE) of the source (facility), without controls, in excess of the following emission limitations?

 $\Box$  YES  $\Box$  NO

Appllicant may use the available <u>Spreadsheet</u> to calculate emissions (See <u>Step 5</u> in application instructions if applicant requires assistance in calculating PTE). Enter the results from the PTE spreadsheet.

Dollardonda	Column A	Column B Permitting Thresholds (tons per year)		
Pollutants	Total Potential to Emit from Spreadsheet			
РМ		25		
PM <sub>10</sub>		15		
VOC		40		
NO <sub>X</sub>		40		
SO <sub>2</sub>		40		
СО		100		
Lead		0.6		
HAP(s)		10 - single or 25 - combined		

If Column A is less than Column B, for <u>every</u> pollutant, <u>and</u> you answered **NO** to Questions 1 and 4, no air quality permit is required, provided the applicant does not have other equipment or activities and operations otherwise required to obtain a permit as a non-major source under Sections 111 or 112 of the Act and PCC.

If Column A is greater than Column B for <u>any</u> pollutant the facility is required to obtain an air quality permit. *Contact the Control Officer if you are required to obtain a permit but otherwise not eligible for the GP.* 

## PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY Air Program 33 N. Stone Avenue • Suite 700 • Tucson, AZ 85701 • Phone: (520) 724-7400 STANDARD PERMIT APPLICATION FORM FOR CLASS II/III GENERAL PERMITS

(As required by A.R.S. § 49-480.J and PCC 17.13.080

1. Permit to be issued to (Arizona Corporate Commission Registered Name):

2.	Mailing Address:
	City:State:ZIP:
3.	Plant Name (if different than item #1):
4.	Proposed Equipment/Plant Location Address:
	City:State:ZIP:
5.	Name of Responsible Official:
	Official Title of RO:
	Phone:Email:
6.	Invoicing Contact (IC)
	Phone:Email:
	IC Mailing Address:
	City:State:ZIP:
7.	Plant/Site Manager/Contact Person:
	Phone: Email:
8.	General Nature of Business:
	Standard Industrial Classification Code(s):
9.	Type of Organization: Corporation Individual Owner Partnership Covernment Entity Other
10	Powerit Application Pasis (Chash all that apply): Now Sources Consered Powerit Powerit
10.	Penewal <i>Revision</i> : Administrative Minor Significant Existing Permit #
	Exterior Revision. Exaministrative invition Esignificant Existing Fermit #
	Date of Commencement of Construction or Modification:
	Is any of the equipment to be leased to another individual or entity?  Yes  No
12.	Signature of Responsible Official of Organization: Date:

## Statement of Compliance with all Applicable Requirements

Permit Number (If existing source)

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. In addition, an applicant shall provide additional information as necessary to address any requirements that become applicable to the source after the date it files a complete application, but prior to release of a proposed permit. Should there be any discrepancies between this application package and Title 17 of the Pima County Code (PCC), the PCC shall be preferred.

This statement must be signed by a Responsible Official. Applications without a signed statement will be deemed incomplete.

The responsible official is defined as a person who is in charge of principal business functions or who performs policy or decision making functions for the business. This may also include an authorized representative for such persons. For a complete definition, see Pima County Air Quality Control, Title 17, Section 17.04.340(A)(200).

I certify that I have knowledge of the facts herein set forth, that the same are true, accurate and complete to the best of my knowledge and belief, and that all information not identified by me as confidential in nature shall be treated by the Pima County Department of Environmental Quality (PDEQ) as public record. I also attest that I am in compliance with the applicable requirements and will continue to comply with such requirements and any future requirements that become effective during the life of my permit. I further state that I will assume responsibility for the construction, modification, or operation of the source in accordance with the requirements of Title 17 of the Pima County Code and any permit issued thereof.

Name (Print/Type): _	-	Title:
(Signature):		Date:

## Certification of Truth, Accuracy, and Completeness

17.12.165(H) - Certification of Truth, Accuracy, and Completeness. Any application form, report, or compliance certification submitted pursuant to this Chapter shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate, and complete.

By my signature I, (Name) \_\_\_\_\_\_, hereby certify that based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

(Signature): \_\_\_\_\_

Official Title: \_\_\_\_\_ Date: \_\_\_\_\_

### ATTACHMENT 3: FACILITY EQUIPMENT LIST

Please list all of the boilers, heaters, and other fuel fired equipment as well as internal combustion engine(s) which are at or planned for the facility. If internal combustion engine(s) are used exclusively for emergency purposes please designate them as emergency engines.

#### Please make copies of this page to complete if required.

Type of Equipment	MFR/ Model	Serial Number/ Unique ID	Maximum Rated Capacity	Date of MFR	Date Installed	Fuel Used

### ATTACHMENT 4: APPLICABLE REGULATIONS, OTHER OPERATIONS, AND ACTIVITIES DECLARATION

Operation or Activity Description (including other operations subject to 17.16.130) & et.al.)	Throughput or Size	Applicable Y/N Questions 7 thru 10 of Questionnaire	Estimated Emissions Tons/Yr
Fugitive Dust Requirements – PCC 17.16.055 – 17.16.120	N/A	□ YES □ NO	N/A
Oil Fired Boilers or Dual Fired Boilers – NESHAP, Subpart JJJJJJ	N/A	□ YES □ NO	N/A
Please indicate in equipment list as: Oil Fired or Dual Fired Boiler			
Gasoline Fuel Storage and Dispensing – NESHAP, Subpart CCCCCC (Tanks > 250 Gal and Throughput > 1000 Gal./month)	Gal/Month	□ YES □ NO	
Please indicate in equipment list as: Gasoline Tank if applicable			
Please indicate in equipment list as: Gasoline Dispensing Facility 'GDF' if applicable			
Surface Coating and Abrasive Blasting – 17.16.400.C & 17.16.100	Gal/yr	□ YES □ NO	
Please indicate in equipment list as: Surface Coating Operation if applicable			
Other operations and activities and non-major source regulations that may apply (Please attach any relevant support information:			

# ATTACHMENT 5

# **AS PROVIDED IN STEP 7 OF THE INSTRUCTIONS**

# FOR NEW SOURCES:

# ATTACH FACILITY MAPS, PROCESS DESCRIPTIONS & EQUIPMENT SUPPORT INFORMATION INCLUDING CERTIFICATIONS AND PHOTOS AS APPLICABLE