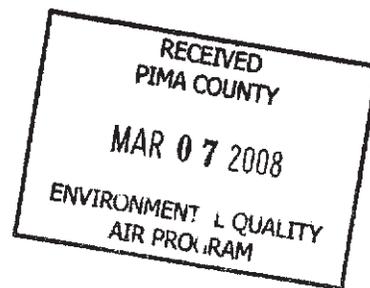




Mission Complex

March 7, 2008



Mr. Mukonde Chama
Air Permits Supervisor
Pima County Department of Environmental Quality
150 West Congress Street
Tucson, Arizona 85701

RE: Air Quality Permit Renewal (Permit #2026)

Dear Mr. Chama:

This letter in items 1 and 2 and attached documents provides the information requested in your letter dated January 25, 2008 regarding the above-referenced permit renewal. In addition to the information requested by the Pima County Department of Environmental Quality (PDEQ), ASARCO LLC Mission Complex (Asarco) is revising its permit application to provide updated information in item 3 of this letter .

1) Data (based on approved test results) or manufacturer's data that supports all control efficiencies claimed in the renewal application

In section 14, Air Pollution Control Information, of its permit renewal application, Asarco provided rated operating efficiencies from EPA's "Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources" (commonly known as AP-42). Emission factors and emission information presented in AP-42 are some of the most, if not the most, widely accepted emissions information available. In fact, PDEQ's Title V permit application states that an applicant should use AP-42 emission factors when calculating emissions information because the factors are the "most commonly used and always accepted." PDEQ, *Standard Permit Application Form Filing Instructions* at 3 (May 2007). Indeed, in Asarco's previous Title V permit application, PDEQ accepted AP-42 control efficiency values for these same control devices.

In addition, the emission limits in Asarco's permit are not based upon a control device operating efficiency. Rather, Asarco's emission limits are based upon the federal New Source Performance Standards (NSPS) for Metallic Mineral Processing Plants, 40 C.F.R. Part 60, Subpart LL, and the Pima County Code. Thus, a determination of the actual control efficiency for each control device Asarco has onsite will not affect any of the permitted emission limits and will not affect pollution control from the source.

For convenience, however, Asarco has included reference to the source of the emission estimates (e.g., stack testing) that was used to calculate the potential to emit for the source.

Asarco operates three types of emission control devices: scrubbers, baghouses, and spray bars. Additional information relevant to the control efficiency for each type of device is presented below:

A. Baghouses

In the Air Pollution Control Information section of the permit renewal application, Asarco reported baghouse operating efficiencies of 95 or 99%. During operation, baghouses have a relatively constant outlet concentration. EPA, AP-42, § 11.24.3 (Jan. 1995). In the mineral products industry, baghouses consistently reduce emissions to less than 0.05 grams per dry standard cubic meter. *Id.* When operating at this control level, baghouses remove greater than 99 percent of particulate emissions. *Id.* The 0.05 grams per dry standard cubic meter emission limit is the same limit that is required by the federal NSPS for Metallic Mineral Processing Plants and Asarco's current Title V permit. *See* 40 C.F.R. § 60.382(a); Air Quality Operating Permit number 2026, Part "B", section I.A.1. Asarco has revised the Air Pollution Control Information section to uniformly report operating control efficiencies of 99% for all of its baghouses because it represents the accepted level of control for baghouses when operating within the permit and regulatory levels.

B. Scrubbers

In the Air Pollution Control Information section of the permit renewal application, Asarco reported scrubber operating efficiencies of 95%. EPA reports this level of control for these types of units. EPA, AP-42, § 11.24.3. Furthermore, the website of the manufacturer of the scrubbers, Ducon, reports that wet scrubbers of this type obtain a 99.9% particulate collection efficiency. *See* Ducon, *Dynamic Wet Scrubbers* at www.ducon.com/dynamic-wet-scrubbers.php (copy attached). Thus, the AP-42 value Asarco cited is a conservative control efficiency estimate for these units. Nevertheless, as explained above, Asarco's permitted emission limits are unrelated to the scrubbers' emission control efficiency. For these reasons, Asarco contends that the 95% control efficiency reported for these scrubbers is accurate.

C. Spray Bars

Water spray bars are used at several sites around the facility. Water spray bars are devices that are often individually fabricated for a unique location. In fact, Asarco is unaware whether its spray bars were manufactured commercially or

fabricated on-site. As a result, Asarco does not have any manufacturer data for these units. According to EPA, spray systems reduce emissions by 70 to 95 percent at transfer points and materials handling points (including conveying, screening, crushing, and storing) at sand and gravel operations that are operationally similar to mining materials handling. EPA, AP-42 § 11.19.1.2 (Nov. 1995). Furthermore, it is impossible to empirically measure emission control efficiencies at sources controlled by spray bars because of the impracticability of isolating and measuring emissions from these locations. In addition, the emission limits from sources controlled by spray bars is unrelated to the spray bars' control efficiency. Instead, the limits are specified by federal or county regulation. For this reason, the most reliable control efficiency for these units is the AP-42 factor and operator knowledge.

In the Air Pollution Control Information section of the initial permit renewal application, Asarco reported water spray bar control efficiencies of 70%. Meanwhile, Asarco has historically used a 90% control efficiency for water spray bars in its annual emission inventories. Likewise, in the emission information submitted with the initial permit renewal application, Asarco used a 90% control efficiency for its water spray bars. Because PDEQ has accepted a 90% water spray bar control efficiency in Asarco's emission inventories, and because 90% is within the AP-42 control efficiency range, Asarco has revised the Air Pollution Control Information section to present 90% control efficiency for spray bars.

2) Revised Compliance Assurance Monitoring (CAM) Plan

Asarco has revised its Compliance Assurance Monitoring Plan submission in accordance with PDEQ's request. Please see the attached submittal.

3) Other Changes

Pursuant to section 17.12.160(H) of the Pima County Code, Asarco is providing the following information to correct the Title V Permit renewal application submitted on December 15, 2007.

A. Removal of Norblo Baghouse

The Air Pollution Control Information, section 14 of the permit renewal application, included reference to a Norblo Baghouse controlling emissions from emission point SSOPN-4. *See* Asarco Permit Application § 14, no. 11. Asarco has not operated this unit for a long time because it is not needed for Asarco to comply with its emission limits at this location. As a result, Asarco has removed this unit from operation and Asarco has removed reference to this unit from the Air Pollution Control Information section, the Description of all Process and Control Equipment, section 11, and the Stack Information, section 14, of the

permit renewal application. Also, the emissions sheet has been revised to remove the effect of this control device from emission point SSOPN-4.

B. Wheelabrator Baghouses

On the Air Pollution Control Information, section 14 of the permit renewal application, Asarco reported Wheelabrator baghouse control efficiencies of 95% but failed to include the reference to AP-42. As discussed above, according to AP-42, baghouses operate at a 99% control efficiency. For this reason, the control efficiency of the Wheelabrator baghouses has uniformly been revised to 99%. In addition, the reference to AP-42 has been added.

C. Ducon Wet Scrubber Control Efficiency

On the Air Pollution Control Information, the Ducon wet scrubber controlling emissions at emission point SSMP-1 has the wrong operating efficiency listed. It has the operating efficiency for a baghouse (99%) listed rather than a scrubber (95%). Asarco corrected this typographical error.

D. Addition of Emission Points in the Air Pollution Control Information Section

The transfer of ore from haul trucks to the primary crusher dump pocket at the Mission, North, and South Mill primary crushers should have been included on the Air Pollution Control Information section of the permit renewal application. At the dump pocket, there are fugitive particulate emissions that are controlled by spray bars. Emissions from these fugitive sources were included in the emissions estimates as emission numbers HFOPM-1, HFOPN-1, and HFOPS-1 and have been added to the Air Pollution Control Information section.

E. Identification of American Air Filter Roto Clone Scrubber

In the Stack Information section of the permit renewal application, section 12, Asarco identified the American Air Filter Roto Clone Scrubber as equipment identification number M309-100. The correct equipment identification number for this unit is M309-101. This unit is properly identified in the Equipment List, section 11 (number 36). The Stack Information section of the permit renewal application has been revised to reflect this information.

F. Removal of Emission Number SSOPN-5

After submission of Asarco's initial permit renewal application, Asarco determined that SSOPN-5 is not a separate emission point. The emission point that was identified as SSOPN-5 is a water spray bar that sprays water onto the material traveling on conveyor 361-29 as the conveyor exits the building.

Emissions from the transfer point to and from this conveyor are controlled by scrubbers. As a result, this water spray bar is not controlling emissions from either of these transfer points that are governed as an emission source. The spray bar is not required by federal or county regulation and is not needed for Asarco to meet any emission limit. It is unclear why this spray bar was originally listed as an emission point. Consequently, it has been removed from the Air Pollution Control Information section and from the Emission Summary.

G. Correction of Stack Height Data

Since Asarco's last permit application, some of the stacks at the facility have been repaired which has changed their height. The new heights were not incorporated into the stack height data submitted with the initial Title V permit renewal application. Section 12, Stack Information, has been revised to incorporate the following stack heights: scrubber number 10-108, height 17 feet, 11.5 inches; scrubber number 30-150 is 6 feet, 4.5 inches, and scrubber number 20-270 is eleven feet, 4.5 inches.

Certification of Truth, Accuracy, and Completeness

17.12.160(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, Mark Kalmi, 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 of Responsible Official of Organization: 

Title: GENERAL MANAGER Date: 3/6/08