PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROCEDURE

POLICY NO.: Technical Procedure, TECH-210       EFFECTIVE DATE: July 2, 2002

POLICY: RULE INTERPRETATION, TITLE 17 OF THE PIMA COUNTY CODE (PCC)
In order to provide the public with a consistent interpretation of Title 17 of the Pima County
Code, Department staff shall adhere to the following procedure when assessing the applicability
of PCC §17.16.165.J.

PURPOSE: The purpose of this technical policy is to ensure consistent application of the rule
throughout all Department Divisions.

PROCEDURE: When assessing the applicability of rule 17.16.165.J in permitting or
enforcement, the rule shall only be applicable if the companion rule at 17.16.165.l has been
determined to be applicable.

JUSTIFICATION: For a permittee to comply with PCC §17.16.165.J, it is necessary that a
continuous opacity monitoring system, with an appropriate data recording and handling system,
be installed and operated. Without such a system, a permittee's only recourse is to have an
individual continuously conducting Method 9 tests on the plume or effluent and calculating 6-
minute averages every 15 seconds. That would clearly be an unnecessary and burdensome
requirement that could not have been intended by the original rule writers. It seems apparent that
PCC §17.16.165.J should be considered in conjunction with PCC §17.16.165.l. As PCC
§17.16.165.l requires the installation of a continuous monitoring system for measuring opacity
under certain circumstances, it would then be reasonable to require reporting under PCC
§17.16.165.J.

APPROVED BY:

[Signature]
Ursula Kramer
Director

Original Policy Approved: July 2, 2002
Date(s) Revised:
NOTICE OF AGENCY SUBSTANTIVE POLICY STATEMENT
PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY

1. Subject of the substantive policy statement and the substantive policy statement number by which the policy statement is referenced:
   TECH – 210, Rule Interpretation, Title 17 of the Pima County Code (PCC)

2. Date the substantive policy statement was issued and the effective date of the policy statement if different from the issuance date:
   July 2, 2002 (date of issuance/effect)

3. Summary of the contents of the substantive policy statement:
   This policy statement establishes a consistent interpretation of Pima County Code 17.16.165.J., excess emissions reporting.

4. A statement as to whether the substantive policy statement is a new statement or a revision:
   New policy statement

5. The name, address, and telephone number of the person to whom questions and comments about the substantive policy statement may be directed:
   Name: Richard Grimaldi
   Deputy Director
   Address: Pima County DEQ
            130 W. Congress, 3rd floor
            Tucson, AZ 85701
   Telephone: (520) 740-3332

6. Information about where a person may obtain a copy of the substantive policy statement and the costs for obtaining the policy statement:
   Name: Vicki Bennie
   Executive Administrative Assistant
   Address: Pima County DEQ
            130 W. Congress, 3rd floor
            Tucson, AZ 85701
   Telephone: (520) 740-3330
   The policies are available on our website at www.deq.co.pima.az.us or we can copy them for you at 20¢ per page.
306.8 No change
306.9 Offsets shall be made on either a pounds-per-hour, pounds-per-day, pounds-per-quarter, tons-per-quarter, or tons-per-year basis, whichever is applicable, when all sources involved in the emission offset calculations are operating at their maximum expected or allowed production rate and, except as otherwise provided in subsection 306.6 of this rule, utilizing the type of fuel burned at the time the application for the permit or permit revision under this rule is filed. A tons-per-year basis shall not be used if the new or modified source or the source offsets are not expected to operate throughout the entire year. No emissions credit may be allowed for replacing 1 VOC with another VOC of lesser reactivity.
306.10 Emissions reductions achieved by shutting down an existing source or permanently curtailing production or operating hours below baseline levels may be credited, if the work force to be affected has been notified of the proposed shut down or curtailment. No offset credits for shutdowns or curtailments shall be provided for emissions reductions that are necessary to bring a source into compliance with RACT or any other standard under an applicable implementation plan. Source shutdowns and curtailments in production or operating hours occurring before the date the new major source or major modification application shall not be used for emissions offset credits except as follows: if an applicant can establish that it shut down or curtailed production after August 7, 1977, or less than 1 year before the date of application for the permit or permit revision under this rule, whichever is earlier, and the proposed new major source or major modification is a replacement for the shutdown or curtailment, then credit for the shutdown or curtailment may be applied to offset emissions from the new source or modification.
306.11 No change
306.12 No change
306.13 No change
307 No change
308 No change
309 No change
501 No change
502 No change
503 No change
504 No change
405 No change
506 No change
507 No change
508 No change
509 No change
510 No change
511 No change

NOTICE OF AGENCY SUBSTANTIVE POLICY STATEMENT
PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY

1. Subject of the substantive policy statement and the substantive policy statement number by which the policy statement is referenced:
   TECH – 209, Discharge of Water from Swimming Pools and Spas

2. Date the substantive policy statement was issued and the effective date of the policy statement if different from the issuance date:
   April 21, 2003 (date of issuance/effect)

3. Summary of the contents of the substantive policy statement:
   This policy establishes procedures for staff when responding to complaints of improper discharge of water from swimming pools and spas.

4. A statement as to whether the substantive policy statement is a new statement or a revision:

5. The name, address, and telephone number of the person to whom questions and comments about the substantive policy statement may be directed:
   Name: Richard Grimaldi
   Deputy Director