

Pima County
Department of Environmental Quality
Air Quality Permitting
Overview

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Overview

- History of permitting program
- Who we permit
- Applications
- Permit contents
- Permit timeline and timeframes

History of PDEQ's Permitting Program

- Pre-1990: Two permit system
 - Installation Permit
 - Operating Permit
 - Approximately 2,500 operating permits issued
- 1992: Arizona legislature creates Title V Program in statutes
- 1993: Pima County Code revised to be consistent with statutes:
 - Unitary (one) permit system
 - Class I (Title V) permit requirements created to conform to Clean Air Act (40 CFR Part 70)
- 1997: Permit thresholds revised to be identical to ADEQ
- 2008: Currently 285 permits

Permitting Classes

Stationary Source
Permits
Individual
or
General

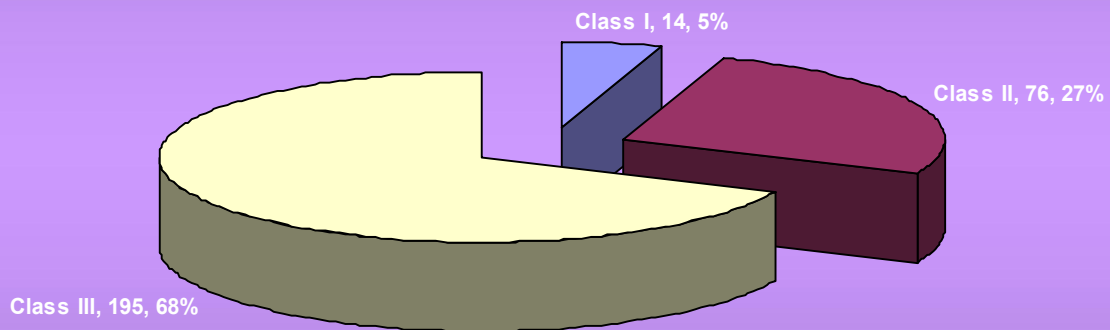
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graph TD; A[Stationary Source Permits Individual or General] --> B[Class I Title V Permits]; A --> C[Class II Minor Source subject to NESHAP or NSPS]; A --> D[Class III Minor Source subject to County rules];
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Class I
Title V Permits

Class II
Minor Source
subject to
NESHAP or NSPS

Class III
Minor Source
subject to County rules

Permit Class Spread

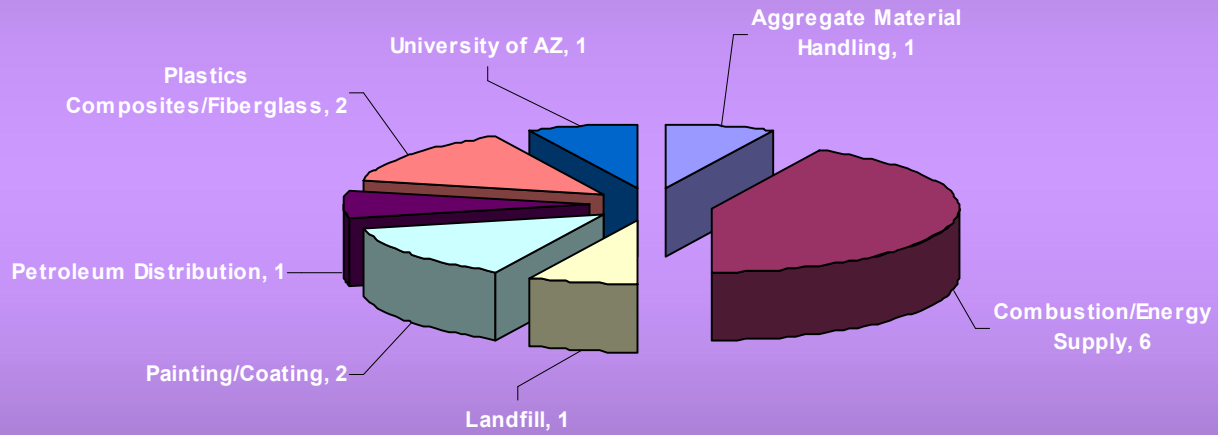


Class I Class II Class III

Class I Permits (Title V)

- Potential to Emit (PTE) of 100 tons per year of any criteria air pollutant
- PTE of 10 tons per year of a single HAP
- PTE of 25 tons per year combined HAPs
- Subject to Acid Rain provisions in the Clean Air Act
- Solid waste incineration units
- Source category designated by EPA

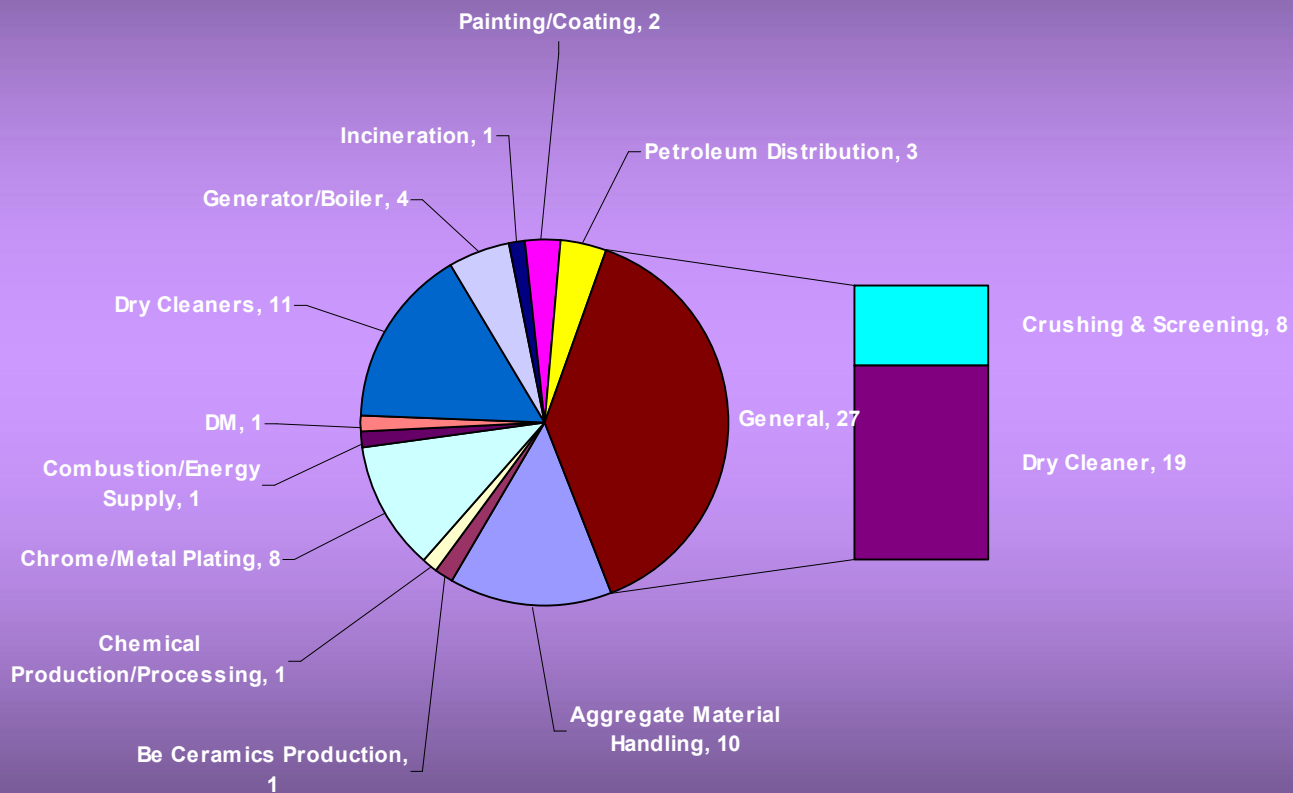
Class I Permit Distribution



Class II permits

- Minor sources subject to federal standards
 - CAA Section 111 – New Source Performance Standards (NSPS)
 - CAA Section 112 - National Emissions Standards for Hazardous Air Pollutants (NESHAP)
- Minor sources
 - True minor - Potential to Emit (PTE) below major source thresholds
 - Synthetic minor – facility takes limitation to keep PTE below major source thresholds

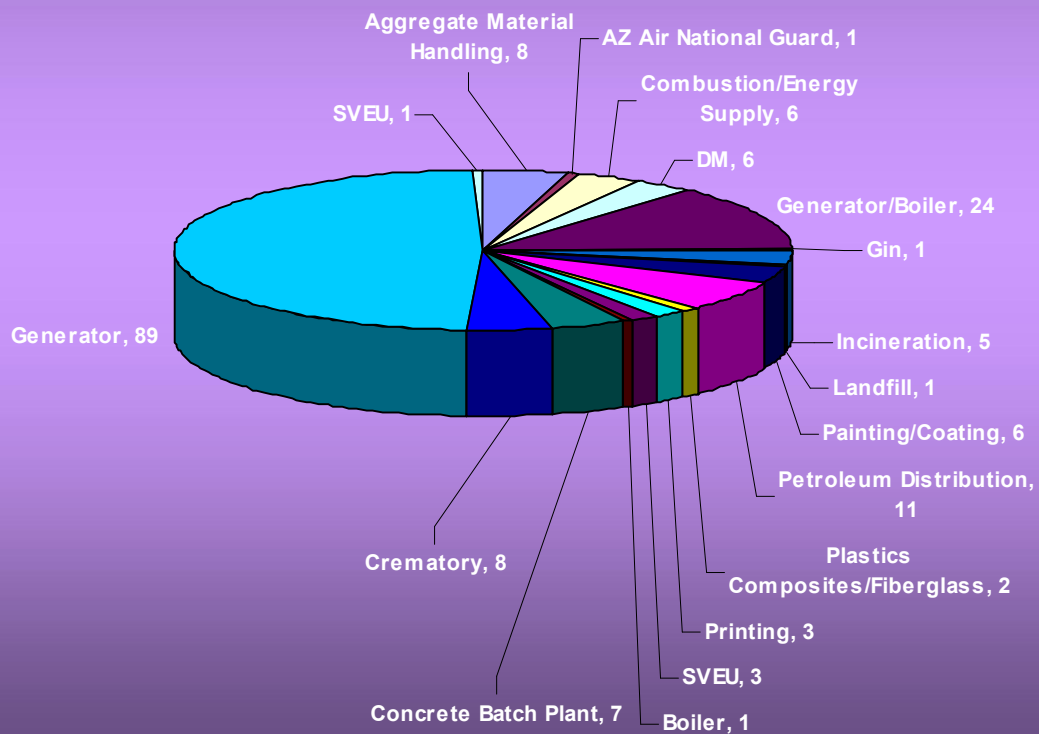
Class II Permit Distribution



Class III permits

- Minor Sources
 - True Minor
 - Synthetic Minor
- Subject to local Pima County standards only
- Stationary rotating machinery > 325 HP
- Boilers > 1 MMBTUs/hr for more than an 8 hour period (excluding 1-2 family residences)
- PTE Above "Significant" amounts
 - 15 – 100 TPY for PM₁₀
 - 25 – 100 TPY for PM
 - 40 – 100 TPY for NO_x, SO_x, VOC

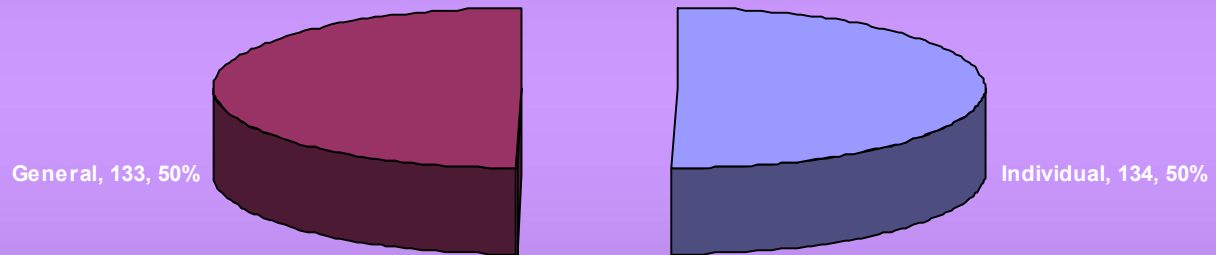
Class III Permit Distribution



Individual vs. General Permits

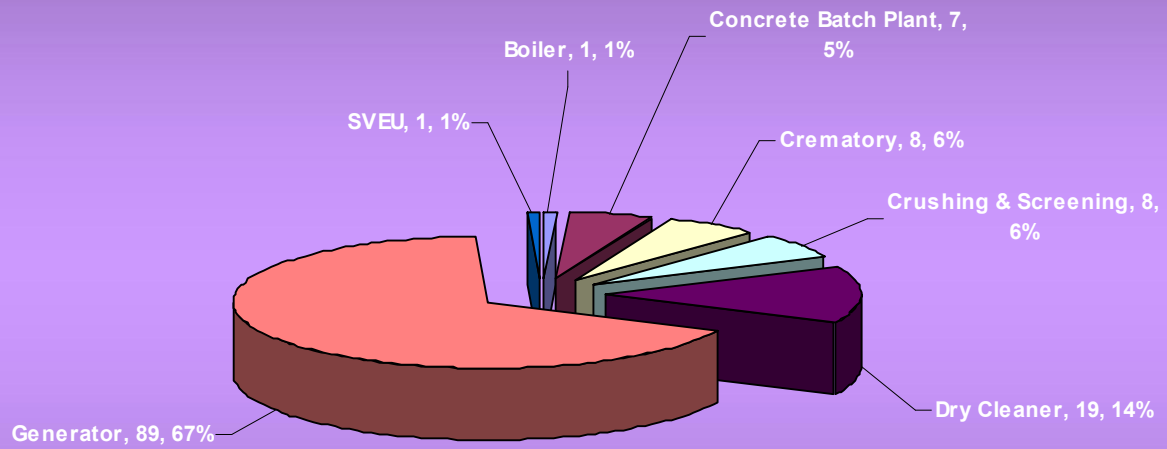
- Individual permits
 - Issued specifically for one facility
 - Hourly processing cost to develop permit
- General permits (GP)
 - Generally used when there are several of the same type of source. Have to follow GP provisions
 - Issued a pre-approved permit with an authorization to operate (ATO)
 - Flat fee

Individual/General Permit Split

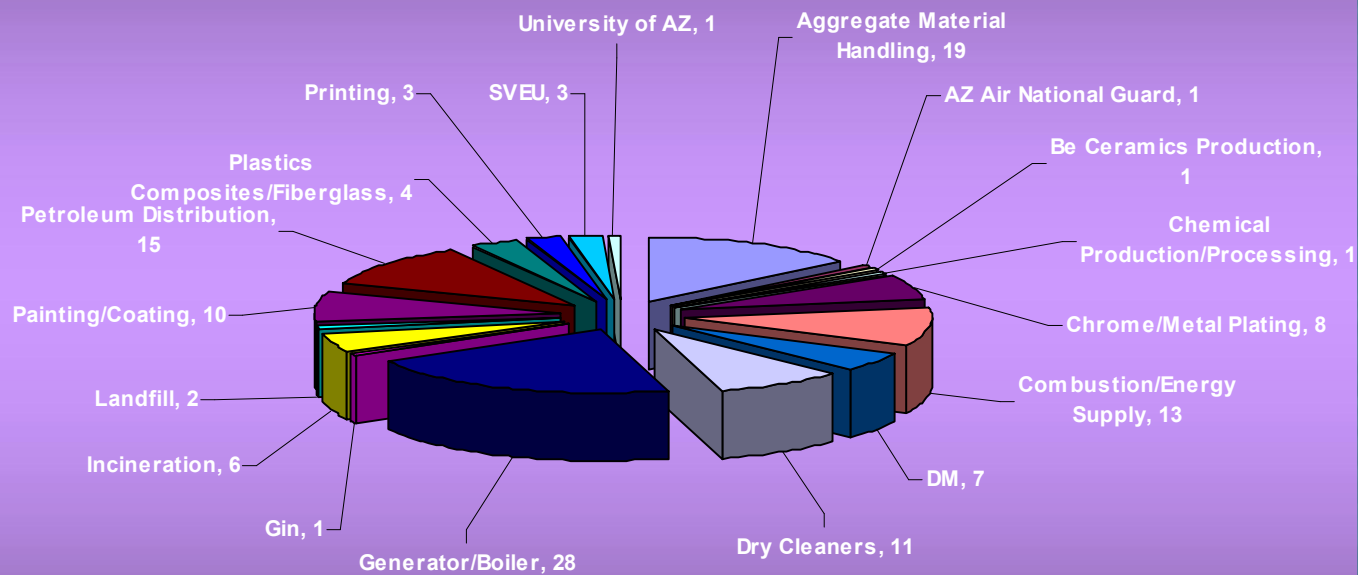


Individual General

General Permit Spread



Individual Permit Spread



Permit Applications

- Class I permit applications require:
 - Administrative Information
 - Standard Industrial Code (SIC)
 - Date of Commencement
 - Signature of Responsible Official
 - Equipment List
 - Emission Sources and PTE
 - Applicable requirements
 - Certification of Truth, Accuracy, and Completeness
- Class II & III permit applications require:
 - Administrative Information
 - Equipment List
 - Emission Sources and PTE
 - Applicable requirements

Class I Permit Requirements

- Title V Permits under the CAA
- Consist of federally required elements found under 40 CFR Part 70
- Two part permit
 - Part A: General provisions
 - Part B: Specific Conditions
- Requires
 - Semi-annual reporting of monitoring
 - Annual compliance certifications
- Annual fees consist of administrative fee and emissions fee
- Title V requires PDEQ to develop a Statement of Basis referred to as a Technical Support Document (TSD)

Class II/III Permit Requirements

- Minor source permits
- Streamline permits by
 - Eliminating Part A
 - Eliminating semi-annual and annual reports (unless required under NSPS or NESHAP)
 - Simplified the permit
- Goal is to increase compliance by issuing permits that are easy to follow with equipment or process applicable requirements only

Timeline

- Source submits an application
- PDEQ performs administrative and technical review to ensure completeness
- Preliminary draft is prepared
- Draft sent to source for review and comment
- Comments are discussed and incorporated, may meet with source
- Draft permit and TSD are put out for public notice for comment and review
- If necessary a public hearing is held
- Changes due to public comments addressed
- If the permit is a Class I (Title V) permit, sent to EPA for required 45 day review
- Permit is issued

Time Frames For New Permits

- Class I permits: ~ 1 year
- Class II/III permits: ~ 6 months
- General permits: ATO issued within 2 weeks
- All permits depend on:
 - Completeness of application
 - If public comments are received
 - If alternate operating scenarios are requested

Contact Information

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