TECHNICAL SUPPORT DOCUMENT (TSD)

February 2010

1. GENERAL COMMENTS:

A. Company Information

Business Name: University of Arizona

Mailing Address: University of Arizona
Department of Risk Management and Safety
P.O. Box 210300
Tucson, Arizona 85721-0300

Facility Address: University of Arizona
Tucson, Arizona 85721

B. Background

The University of Arizona (herein known as the facility) was first permitted in November of 1991 for the operation of a pathological waste incinerator. The initial permit (containing a one year permit term) was renewed annually until the facility received their first 5-year permit effective November 13, 2001.

The November 2001 permit detailed regulations and conditions applicable to the waste incinerator and various fuel fired equipment. A complete list of the emission sources at the facility is presented in section II.A of this TSD.

Inspections have been conducted at least biennially and past enforcement actions include: The issuance of a Compliance Status Letter for the failure to store VOC containing materials without taking necessary and feasible measures to control evaporation, and issuance of Notice of Violations (NOV) for a failure to comply with several permit conditions included within the monitoring, recordkeeping and reporting requirements of the permit. The last NOV was issued in June 2008 and has subsequently been resolved.

No other violations of air quality standards or permit conditions have been noted. The facility is currently in compliance with the permit conditions.

C. Attainment Classification

The facility is located in a portion of Pima County that is currently classified as attainment for all criteria pollutants.

2. SOURCE DESCRIPTION

The facility is a non-profit, public education institution whose primary role is to provide student education and maintain research facilities for advanced degree programs. The facility operates under Standard Industry Classification (SIC) Code 8221 and North America Industry Classification System (NAICS) Code 611310.

A. Process Description

The facility is subject to air permitting due to emissions of regulated pollutants generated primarily by fuel-fired equipment. The emission sources at the facility include:

- natural gas fired boilers;
- diesel fired emergency generators;
- natural gas emergency generators;
- gasoline fired engines;
- natural gas fired turbines;
- a single pathological waste incinerator;
- a confined paint spray booth; and
- Various painting, coating and degreasing operations.

The facility has federally imposed operating limitations for NSPS subject **emergency** compression ignition internal combustion engines. These limitations are summarized in Table 1.

Table 1
Federally Enforceable Operating Hour Limits for NSPS Subject Emergency Compression Ignition Internal Combustion Engines

Equipment ID	Voluntary Operating Hour Limits (hrs/yr)
All emergency CI ICE (subject to NSPS)	100

The facility has proposed voluntary operating limitations for compression ignition internal combustion engines (not subject to NSPS) and spark ignition combustion internal combustion engines. These limitations are summarized in Table 2 and Table 3.

Table 2
Voluntary Operating Hour Limits for Compression Ignition Internal Combustion Engines (not subject to NSPS)

Equipment ID	Voluntary Operating Hour Limits (hrs/yr)
440116	600
1740101	1500
All other Compression Ignition Internal Combustion Engines (not subject to NSPS)	200

Table 3
Voluntary Operating Hour Limits for Spark Ignition Internal Combustion Engines

Equipment ID	Voluntary Operating Hour Limits (hrs/yr)
440110	400
440114	600
All other Spark Ignition Internal Combustion Engines	200

B. Air Pollution Control Equipment

The following emission source groups include air pollution control equipment:

- Paint spray booth ;
- Boilers with Lo-NO_X burners incorporating flue gas recirculation (intrinsic to the boilers); and
- A pathological waste incinerator with a secondary combustion chamber (intrinsic to the incinerator).

3. REGULATORY HISTORY

A. Testing & Inspections

Regular inspections have been conducted by Pima County Department of Environmental Quality (PDEQ) since the initial permit was issued. The following past enforcement actions were a result of those inspections:

- Following the May 2000 and December 2001 inspections, a Compliance Status Letter and a Notice of Violation was issued respectively for failure to store VOCs containing materials without taking necessary and feasible measures to control evaporation. This compliance and violation was adequately resolved on July 5, 2000 and July 17, 2002 respectively.

- Following the August 2004 inspection, a Notice of Violation was issued for the following violations:

  1) Failure to submit the appropriate permit amendment following changes in equipment and operations at the facility;

  2) Failure to monitor the hours of operation of each engine using a required non-resettable hour meter;

  3) Failure to provide the Control Officer notification of actual date of initial startup of an effected facility;

  4) Failure to record and report malfunctioning equipment;

  5) Failure to retain complete and accurate records for a period of five years;

  6) Failure to conduct a required performance test on an effected facility; and

  7) Failure to submit the initial performance test results conducted on an effected facility.

  These violations were adequately resolved on June 17, 2005.

B. Excess Emissions

No reports of permit deviations as a result of excess emissions.

4. EMISSIONS ESTIMATES

A summary of the facility's annual potential to emit (PTE) of regulated pollutants is presented in Table 4.

Detailed calculations of these emissions have been provided by the Permittee and have been reviewed and approved by PDEQ. Based on these emission estimates, the facility is a Class I, major source for NO_X and CO, and a true minor for all other pollutants.

Table 4
Annual Potential to Emit

Pollutant	NO_X	CO	SO_2	VOC	PM_{10}[1]	HAP_S
Potential to Emit	133.15	102.48	6.35	12.88	17.61	4.09

[1] Particulate matter emissions are assumed to be predominately of PM_{10} size fraction.

Insignificant activities are identified in section 5.1.1 of the permit application pursuant to the definition in PCC 17.04.340.

5. APPLICABLE REQUIREMENTS

New Source Performance Standards (NSPS)

The following NSPS rules are applicable to the source:

- 40 CFR Part 60 Subpart A - General Provisions - applicable to equipment subject to 40 CFR Part 60, Subparts Dc and GG as described below.

- 40 CFR Part 60 Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units - applicable to the six boilers rated between 10 MMBtu/hr and 100 MMBtu/hr, and installed after June 9, 1989.

- 40 CFR Part 60 Subpart GG - Standards of Performance for Stationary Gas Turbines - applicable to the two natural gas turbines with heat input at peak load greater than 10 MMBtu/hr, and installed after October 3, 1977.

- 40 CFR Part 60 Subpart IIII - New Source Performance Standards (NSPS) for Stationary Compression Ignition Internal Combustion Engines – applicable to three stationary compression ignition internal combustion engines (CI ICE) that are not certified National Fire Protection Association (NFPA) fire pump engines and are model year 2007 or later.

The following NSPS rules could, but do not apply for the following reason(s):

- 40 CFR Part 60 Subpart D - Standards of Performance for Fossil Fuel Fired Steam Generators for Which Construction is Commenced After August 17, 1971 - does not apply because the affected facilities (boilers) at the facility do not have a capacity greater than 73 megawatts (250 MMBTU).

- 40 CFR Part 60 Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units - does not apply because the affected facilities (boilers) at the facility do not have a heat input capacity greater than 29 MW (100 million Btu/hour).

- 40 CFR Part 60 Subpart EEEE - Standards of Performance for Other Solid Waste Incineration Units for Which Construction is Commenced After December 9, 2004, or for Which Modification or Reconstruction is Commenced on or After June 16, 2006. – does not apply provided that the Permittee burns in the incinerator 90 percent or more by weight (on a calendar quarter basis and excluding the weight of auxiliary fuel and combustion air) of pathological waste, low-level radioactive waste, and/or chemotherapeutic waste as defined in §60.2977 and you notify the Administrator that the unit meets these criteria. (See 40 CFR 60.2877(l) for the definition of pathological waste).

National Emissions Standards for Hazardous Air Pollutants (NESHAP)

The following NESHAP rules could, but do not apply for the following reason(s):

- 40 CFR Part 63 Subpart Q - National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers (Section 63.400 - 63.406 & Table) - does not apply because the facility does not use chromium based chemicals in the cooling towers and is not a major source for HAPs.

State Implementation Plan (SIP)

The following SIP rules apply to the facility:

- Fugitive Dust Producing Activities ..... SIP Rule 224
- Incinerators ..... SIP Rule 313
- Petroleum Liquids ..... SIP Rule 314
- Particulates Material. (Subsections A, C, and D) ..... SIP Rule 316
- Emissions Discharge Opacity Limiting Standards, Standards and Applicability (Includes NESHAP) SIP Rule 321
- Compilation of Mass Rates and Concentrations. (NESHAPS) ..... SIP Rule 332
- Visibility Limiting Standard. ..... SIP Rule 343
- Odor Limiting Standards ..... SIP Rule 344

Pima County Code (PCC)

The following PCC rules apply to the facility:

- Permits Containing Voluntarily Accepted Emission Limits and Standards, The facility has self imposed limits on all gasoline engines and emergency generators as summarized in Tables 2A through 2C of the May 2006 permit application. ..... PCC 17.12.190
- Local rules and Standards ..... PCC 17.16.010
- Visible Emissions Standards - Standards and applicability (Includes NESHAP) ..... PCC 17.16.040
- Visibility limiting standard ..... PCC 17.16.050
- Standards of performance for fossil-fuel fired steam generators and general fuel burning equipment ..... PCC 17.16.160
- Standards of performance for fossil-fuel fired industrial and commercial equipment ..... PCC 17.16.165

- Incinerators ..... PCC 17.16.170
- Standards of performance for storage vessels for petroleum liquids PCC 17.16.230
- Organic solvents and other organic materials (sections A and C) .... PCC 17.16.400

6. PERMIT CONTENTS

Category A: NSPS for Small Industrial-Commercial-Institutional Steam Generating Units (Boilers rated between 10 MMBtu/hr and 100 MMBtu/hr, and installed after June 9, 1989) (40CFR Part 60, Subpart Dc)

I. Emission Limitations/ Standards:

The facility is not subject to any emission limit under 40 CFR 60 Subpart Dc. The source is however subject to the monitoring and recordkeeping requirements of the subpart identified in section VI.A.II and VI.A.III of this TSD respectively.

Opacity Standard. ..... SIP Rule 321 & PCC 17.16.040.A
Fuel Limitation. ..... PCC 17.12.190.B

II. Monitoring Requirements: ..... PCC 17.12.180.A.3

Opacity monitoring ..... PCC 17.12.180.A.3
Fuel limitation requirement ..... PCC 17.12.180.A.3
Daily amounts of fuel combusted ..... 40 CFR 60.48c(g)(2) & (3)

Federal New Source Performance Standards require the Permittee to record and maintain records of the amount of fuel combusted during each day. [Pursuant to 40 CFR 60.48c(g)]

Various Environment Protection Agency (EPA) 'Applicability Determination Index' documents are available detailing the EPA's position to allow changes to the daily fuel usage recordkeeping and reporting frequency under Subpart Dc for boilers fired with only natural gas. EPA's reasoning has been that it is unnecessary to keep daily fuel usage records since none of the emission standards in Subpart Dc apply to units fired with natural gas. As such, the facility shall be exempt from monitoring the daily fuel use in the NSPS applicable boilers. The facility is however required to keep separate records of the amount of natural gas burned in the NSPS applicable boilers. [Reference: EPA Applicability Determination Index, Determination Detail Control, Number 0300118] also [030018 0300114, 0300113, 0400002, 0300108, 0300103, 0300107, 0300102, 0200005, 0100050 and 0400020].

40 CFR 60.48c(g)(3) allows the Permittee to record the total amount of natural gas delivered to each affected boiler set, during each calendar month.

Determination of total monthly amount of fuel combusted ..... PCC 17.12.190.B & EPA Determination Detail Control Number 0300118

III. Recordkeeping Requirements:

Retention of fuel combustion records ..... 40 CFR 60.48c(i) & EPA Determination Detail Control Number 0300118

IV. Reporting Requirements:

Excess emissions reporting	PCC 17.12.180.A.5 & PCC 17.12.040

V. Testing Requirements:

No applicable NSPS performance test requirements on associated effected facilities (boilers) because the facility is not subject to the compliance and performance test methods and procedures for sulfur dioxide, 60.44c(a) through (j).

The facility is however subject to the locally enforceable performance test requirements identified below:

Opacity	PCC 17.12.040.B & PCC 17.20.010
Fuel Limitation	PCC 17.12.180.A.3 & PCC 17.20.010
Alternative Test Method	PCC 17.12.045.D

VI. Miscellaneous Comments

- NSPS SO_2 standard not applicable as the facility boilers combust only natural gas. [40 CFR 60.42c(j)];
- No performance tests required, as the boiler is not subject to (a) through (j) of 40 CFR 60.44c;
- Pursuant to 40 CFR 60.48c(g), the source is required to maintain records of the amounts of fuel combusted during each day, however see exclusion to this rule detailed in Section 6, Permit Contents, Category A.II of this TSD.
- The facility has demonstrated compliance with the notification of the date of construction or re-construction, anticipated startup and actual startup pursuant to 40 CFR 60.7 and thus the specific conditions 40 CFR 60.48c(a), 40 CFR 60.48c(a)(1), and 40 CFR 60.48c(3) are not included in the reporting requirements of the permit.

Category B : New Source Performance Standards (NSPS) for Stationary Gas Turbines (40 CFR Part 60, Subpart GG):

I. Emission Limitations/ Standards:

Nitrogen Oxide Limitation	40 CFR 60.332 (c) & 40 CFR 60.332(a)(2)
Sulfur Dioxide Fuel Limitation	40 CFR 60.333(b)
Fuel Limitation	PCC 17.12.190.B
Operational Restrictions	40 CFR 60.11(d), PCC 17.16.020, 40 CFR 60.12 & PCC 17.20.040

II. Monitoring Requirements: PCC 17.12.180.A.3

Nitrogen Oxide, Sulfur Dioxide, and Fuel Limitation	40 CFR 60.334(h)(3) & PCC 17.12.180.A.2

III. Recordkeeping Requirements: PCC 17.12.180.A.4

Operational Records	40 CFR 60.7(b)
Retention of Monitoring Records	40 CFR 60.7(f) & PCC 17.12.180.A.4.b

IV. Reporting Requirements: ..... PCC 17.12.180.A.5

Compliance certifications ..... 40 CFR 60.11(g)

V. Testing Requirements: ..... PCC 17.12.010

No applicable NSPS performance test requirements on associated effected facilities (gas turbines). The facility is however subject to the locally enforceable performance test requirements identified below:

Periodic Performance Testing for NO_X ..... PCC 17.12.010.B

VI. Miscellaneous Comments

- The facility is not subject the monitoring requirement under 60.334(a) or (b) as the facility does not use water or steam injection to control NO_X emissions.

  Calculated allowable NO_X emission concentration (STD) for the Solar Tauras 60 Gas Turbine:

  Y = 11380 kJ/kW-hr = 11.38 kJ/W-hr
  F = 0 (zero) [compliance emission test report dated 12/05-06/02 & 12/09/02]

  STD = 0.0150 x (14.4/11.38) = 0.0190 ppm

  Calculated allowable NO_X emission concentration (STD) for the Solar Tauras 70 Gas Turbine:

  Y = 10180 kJ/kW-hr = 10.18 kJ/W-hr
  F = 0 (zero) [compliance emission test report dated 12/05-06/02 & 12/09/02]

  STD = 0.0150 x (14.4/10.18) = 0.0212 ppm

- Compliance with the NO_X, SO_X and Fuel Limitation requirements can be demonstrated by certifying that the fuel used in the process was "natural gas." The federal criteria for natural gas from [40 CFR 60.322(u)] is as follows:

  Natural gas means a naturally occurring fluid mixture of hydrocarbons (e.g. , methane, ethane, or propane) produced in geological formations beneath the Earth's surface that maintains a gaseous state at standard atmospheric temperature and pressure under ordinary conditions. Natural gas contains 20.0 grains or less of total sulfur per 100 standard cubic feet. Equivalents of this in other units are as follows: 0.068 weight percent total sulfur, 680 parts per million by weight (ppmw) total sulfur, and 338 parts per million by volume (ppmv) at 20 degrees Celsius total sulfur. Additionally, natural gas must either be composed of at least 70 percent methane by volume or have a gross calorific value between 950 and 1100 British thermal units (Btu) per standard cubic foot.

  Natural gas does not include the following gaseous fuels: landfill gas, digester gas, refinery gas, sour gas, blast furnace gas, coal-derived gas, producer gas, coke oven gas, or any gaseous fuel produced in a process which might result in highly variable sulfur content or heating value.

- The Permittee may demonstrate compliance with the PM_{10} standard by also certifying that the fuel used in the process was "natural gas".

  Calculated Particulate Emission Limitation (E) for the Solar Tauras 60 Gas Turbine:

  Heat Input (Q) = 7965 Btu/hp-hr = 7.965E-3 MMBtu/hp-hr

  E = 1.02 x 7.965E-30.769 = 0.0248 lb/hr

Calculated Particulate Emission Limitation (E) for the Solar Tauras 70 Gas Turbine:

Heat Input = 7310 Btu/hp-hr = 7.310E-3 MMBtu/hp-hr

E = 1.02 x 7.310E-30.769 = 0.0232 lb/hr

- The Permittee shall demonstrate compliance with the sulfur dioxide standard of 40 CFR 60.333 (applicable to the gas turbines) by ensuring the sulfur content of fuel fired does not exceed 0.8% by weight. This fuel sulfur content limitation approach to demonstrate compliance with the sulfur dioxide standard has been chosen by PDEQ. The alternative demonstration as presented in 40 CFR 60.333(a) has not been chosen as it would require the source to perform a source emissions test. Compliance with the fuel content approach can be readily demonstrated by making available to the Control Officer for his inspection, documentation, such as invoices or statements from the fuel supplier, showing that only commercial natural gas was purchased for use in the equipment.

- The two gas turbines are not subject to Acid Rain provisions. Utility units are exempt from the Acid Rain provisions if the total name-plate capacity is equal to or less than 25 MWe, do not burn coal or coal-derived gaseous fuel with a sulfur content greater than natural gas, and burn gaseous fuel with an annual average sulfur content of 0.05% or less by weight (40 CFR, 72.7(a)).

- CAM provisions do not apply to the two gas turbines nor the six NSPS boilers. 40 CFR Part 64.2(a) defines the applicability of CAM to emissions units. For CAM to apply, the unit must be subject to an emission limit or standard for the applicable regulated pollutant, the unit must use a control device to achieve compliance with that limitation or standard, and the unit must have a pre-control emission potential that would classify it as a major source. The gas turbines have an emission standard for NOx in 40 CFR Part 60, Subpart GG, the larger turbine will be using a CO catalyst add-on control device, but both unit's potential-to-emit is less than major source levels. The six NSPS boilers have no add-on control devices as defined in 40 CFR 64.1 and, additionally, each unit's potential-to-emit is less than major source levels.

Category C: RESERVED

New and Existing Stationary Source Performance Standards for Compression Ignition Internal Combustion Engines (40 CFR Part 60, Subpart IIII)
(Non Emergency CI ICE)

Category D: New and Existing Stationary Source Performance Standards for Compression Ignition Internal Combustion Engines (40 CFR Part 60, Subpart IIII)
(Emergency CI ICE)

I.	Applicability	40 CFR 60.4200
II.	Operational Limitations	PCC 17.12.185.A.2, 40 CFR 60.4201(a)
	A. Emission Limits	40 CFR 60.4201, 40 CFR 60.4203 & , 40 CFR 60.4204, 40 CFR 60.4206 & 40 CFR 60.4211(a)
	B. Fuel Requirements	40 CFR 60.4207(a) & 40 CFR 80.510(a) &(b) 40 CFR 60.4207(b), 40 CFR 80.510(b) & 40 CFR 60.4207(c)
	C. Installation Restrictions	40 CFR 60.4208(a), 40 CFR60.4208(b) & 40 CFR 4208(g) & (h)
	D. Operational Hours (Emergency Designation)	40 CFR 60.4211(e)
	E. Compliance	40 CFR 60.4211, 40 CFR 40211(a) & 40 CFR 4209(a)
III.	Monitoring Requirements	PCC 17.12.180.A.3, 40 CFR 89.1113(b)
	A. Opacity	40 CFR 89.113(b) & PCC 17.12.180.A.3

IV. Recordkeeping ..... PCC 17.12.180.A.4
- A. Hourly Operational Records ..... PCC 17.12.180.A.4
- B. Manufacturer Certifications ..... PCC 17.12.180.A.4
- C. Diesel Fuel Recordkeeping ..... PCC 17.12.180.A.4
- D. Opacity ..... PCC 17.12.180.A.3
- E. Facility Recordkeeping ..... PCC 17.12.180.A.4

V. Reporting Requirements ..... 40 CFR 60.4214 (a)(1) & PCC 17.12.180.A.5

VI. Testing Requirements ..... 40 CFR 60.4212 & PCC 17.12.180.A.3.a

VII. Additional Requirements ..... 40 CFR 60.4218 & 40 CFR 60.4214(b)

Category E : New and Existing Stationary Source Performance Standards for Internal Combustion Engines, Compression and Spark Ignition.
(Locally Enforceable Conditions, unless otherwise stated):

I. Emission Limitations/ Standards:

- A. Particulate Matter Limitation ..... PCC 17.16.340.C
- B. Opacity limitations ..... SIP Rule 321, PCC 17.16.340.E & PCC 17.16.040
- C. Sulfur Dioxide Limitation ..... PCC 17.16.340.F
- D. Operational limitation ..... PCC 17.12.190.B
- E. Fuel limitation ..... PCC 17.12.190.B

II. Monitoring Requirements: ..... PCC 17.12.180.A.3

- A. Compliance with the Particulate matter limitation when required by the Control Officer ..... PCC 17.12.180.A.3
- B. Opacity ..... PCC 17.12.180.A.3
- C. Sulfur Dioxide – compliance with fuel limitation
- D. Operational Hours ..... PCC 17.12.180.A.3
- E. Fuel use verification ..... PCC 17.12.180.A.3

III. Recordkeeping Requirements:

- A. Visible emissions checks/observations ..... PCC 17.12.180.A.4
- B. Daily sulfur content and lower heating value of fuel being fired ..... PCC 17.16.340.I
- C. Operational Hour Logs and rolling monthly totals ..... PCC 17.12.180.A.4

IV. Reporting Requirements: ..... PCC 17.12.180.A.5

- A. Excess emissions reporting ..... PCC 17.12.040
- B. Excess sulfur content of fuel ..... PCC 17.16.340.J

V. Testing Requirements:

- A. Opacity ..... PCC 17.12.050, PCC 17.12.040.B & PCC 17.20.010
- B. Fuel Limitation ..... PCC 17.12.180.A.3, & PCC 17.20.010
- C. Alternative Test Method ..... PCC 17.12.045.D

Category F : New and Existing Stationary Source Performance Standards for Fossil-Fuel Fired Industrial and Commercial Equipment (Boilers, not subject to NSPS)

(Locally Enforceable Conditions, unless otherwise stated):

I. Emission Limitations/ Standards:

A.	Particulate Matter	SIP Rule 332, PCC 17.16.165.C. & PCC 17.16.165.D
B.	Opacity Limitation	PCC 17.16.040
C.	Fuel Limitations	PCC 17.12.190.B & PCC 17.16.165.G

II. Monitoring Requirements: PCC 17.12.180.A.3

A.	Particulate matter	PCC 17.12.180.A.3
B.	Opacity	PCC 17.12.180.A.3
C.	Fuel	PCC 17.12.180.A.3

III. Recordkeeping Requirements:

Fuel supplier specification retention requirements ..... PCC 17.12.180.A.4

IV. Reporting Requirements: PCC 17.12.180.A.5

Excess emissions ..... PCC 17.12.040

V. Testing Requirements:

A.	Opacity	PCC 17.12.050, PCC 17.12.040.B & PCC 17.20.010
B.	Fuel Limitation	PCC 17.12.180.A.3, & PCC 17.20.010
C.	Alternative Test Method	PCC 17.12.045.D

Category G : New and Existing Performance Standards for the Pathological Incinerator (Locally Enforceable Conditions, unless otherwise stated):

I. Emission Limitations/ Standards:

A.	Opacity Limitation	SIP Rule 321.A, PCC 17.16.170.B & PCC 17.16.170.E.1
B.	Particulate Matter Limitation	SIP Rule 332.A, PCC 17.16.170.C.1, PCC 17.16.170.E.1 & PCC 17.16.510.B
C.	Visibility Limitation	PCC 17.16.050.D
D.	Operational Limitations	
1.	Allowable Waste for Incineration	PCC 17.12.180.B [Ref: 40 CFR 60.2887(l)]
2.	Hour Limitation	SIP Rule 313.A & PCC 17.16.170.A
3.	Fuel Limitation	PCC 17.12.190.B

II. Monitoring Requirements: ..... PCC 17.12.180.A.3

A. Opacity and visible emissions ..... PCC 17.12.180.A.3
B. Particulate Matter ..... PCC 17.12.180.A.3
C. Allowable waste ..... PCC 17.12.180.A.3
D. Operational Hour ..... PCC 17.16.170.F
E. Operational Fuel ..... PCC 17.12.180.A.3 & PCC 17.12.180.A.4

III. Recordkeeping Requirements: ..... PCC 17.12.180.A.4

A. Opacity ..... PCC 17.12.180.A.4
B. Operational log ..... PCC 17.16.170.F
B. Waste Percentage ..... PCC 17.12.180.A.4
C. Fuel limitation ..... PCC 17.12.180.A.4
D. Operational Log Update ..... PCC 17.12.180.A.4

IV. Reporting Requirements:

Excess Emissions ..... PCC 17.12.040

V. Testing Requirements:

A. Opacity ..... PCC 17.12.050, PCC 17.12.040.B & PCC 17.20.010
B. Particulate Matter ..... PCC 17.12.180.A.3.a, PCC 17.16.170.G.1.a. & PCC 17.20.010
C. Fuel ..... PCC 17.12.180.A.3, & PCC 17.20.010
D. Alternative Test Method ..... PCC 17.12.045.D

Category H: New and Existing Performance Standards for the Surface Coating and Solvent Degreasing Activities.
(Locally Enforceable Conditions, unless otherwise stated)

I. Emission Limits/ Standards:

A. Surface Coating Overspray Control ..... PDEQ Technical Procedure, TECH-202
B. Standard Operating Procedure ..... PCC 17.12.180.A.2
C. Solvent Degreasing Gaseous/Odorous Materials and VOC Control ..... PCC 17.16.430.D, SIP Rule 344 & PCC 17.16.430.F

II. Monitoring Requirements: ..... PCC 17.12.180.A.3

Conditions for Confined Paint Spray Operations ..... PCC 17.12.180.A.3 & PCC 17.12.180.A.4
Conditions for Solvent Degreasing Activities ..... PCC 17.12.010 & PCC 17.12.180.A.3

III. Reporting Requirements:

Excess Emissions ..... PCC 17.12.040

IV. Testing Requirements:

None specified in Pima County Code.

Category I. General Facility-Wide Standards

I. General Facility-Wide Specific Conditions

A.	Facility Changes	PCC 17.12.180.A.2
B.	Air Pollution Control Equipment	PCC 17.16.020.B
C.	Odor Limiting Standard	PCC 17.12.030 & PCC 17.12.010

II. Recordkeeping Requirements — PCC 17.12.180.A.4.b

A.	Retention of all records	PCC 17.12.080
B.	Retention of permit at the permit site or an approved alternative location	PCC 17.12.080

III. Reporting Requirements — PCC 17.12.180.A.5

A.	Excess Emissions	PCC 17.12.040
B.	Semiannual Reports of Required Monitoring	PCC 17.12.180.A.5.a
C.	Compliance Certifications	PCC 17.12.220.A.2
D.	Emissions Inventory Reporting	PCC 17.12.320

IV. Testing Requirements

There are no facility-wide testing requirements. Specific testing requirements are addressed in each individual category.

7. ALTERNATE OPERATING SCENARIOS:

The applicant has not requested any alternate operating scenarios.

8. IMPACTS TO AMBIENT AIR QUALITY

The facility is currently not subject to PSD or NSR review.

9. CONTROL TECHNOLOGY DETERMINATION

No control technologies needed to be determined. This facility is in an area of attainment and is not a new source.

10. PREVIOUS PERMIT CONDITIONS

None omitted.