

Air Quality Permitting Guidelines for Industrial Sources

Pinal County Air Quality Workshop

Florence – January 27, 2016

Kale Walch & Anu Jain – Permit Engineers

Who needs an industrial permit?

Facilities that have a potential to emit 5.5 pounds per day or 1 ton per year of any regulated pollutant.

Regulated Pollutants

Nitrogen Oxides (NO_x)

Carbon Monoxide (CO)

Sulfur Dioxide (SO₂):

Volatile Organic Compounds (VOCs)

Hazardous Air Pollutants (HAPs)

Particulate Matter (PM₁₀/PM_{2.5})

What is the purpose of a Permit?

- Identifies air quality rules that a source is subject to: local (PCAQCD), State (Statutes) or Federal (EPA).
- Contains emission limits for each significant emission unit.
- Defines allowable hourly, monthly or annual throughputs.
- Monitoring, recordkeeping, and reporting requirements.
- May contain limitations to avoid stringent air quality requirements or higher fees.

Types of Permits

Class I

- New Source Review sources (PSD or NNSR)
- Title V sources (above “major source” thresholds)

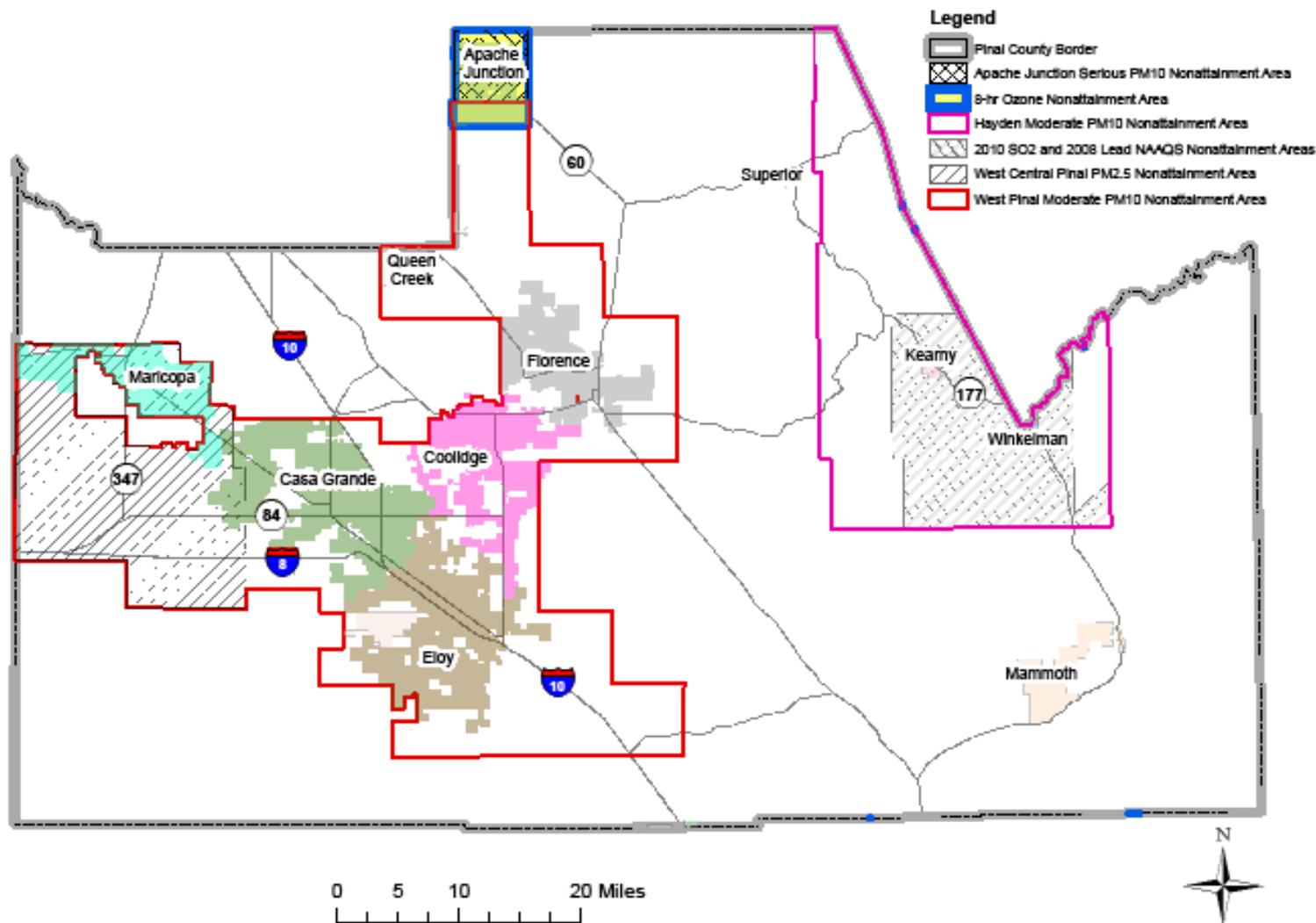
Class II

- Synthetic minor sources
- Medium & small spray paint operations, feed mills, metal fabrication crushing/screening, cotton gins, crematories etc.

Class III

Small gas stations, auto body shops, dry cleaners...

Pinal County Nonattainment Areas



Stationary Sources and PM Nonattainment

Small sources

- Area source rules may be incorporated into permits

Medium sources

- Area source rules may be incorporated into permits
- Source might have to take Federally Enforceable limits to stay under 100 tons per year (tpy)
- May have to implement Reasonably Available Control Technology (RACT) level controls

Large sources

- Nonattainment New Source Review (NNSR) for sources with a PM₁₀ potential to emit (PTE) over 100 tpy
- New sources must install Lowest Achievable Emission Rate Technology (LAER) which does not consider economic impacts
- Existing sources must implement Reasonably Available Control Technology (RACT) level controls
- Offsets at a ratio of at least 1:1 will be required
- Area source rules may be incorporated into permits

New Permit

- Permit Application

- Additional Forms (if applicable) for Fuel Burning equipment, Storage Tanks, Crushing and Screening equipment, Cotton Gins, Generators, Soil Vapor Extraction Units, Spray Paint Booths and Wastewater Treatment Plants.

- Generic Outline or Air Quality Permit Filing Instructions (process description, site plan, flow diagram, plant and equipment capacities, MSDS sheets etc.)

- Application fee

Forms available at

<http://www.pinalcountyaz.gov/Departments/AirQuality/Pages/IndustrialPermits.aspx>

New Source Performance Standards NSPS (40 CFR Part 60)

**Db – Industrial-Commercial-Institutional Steam
Generating Units**

GG – Stationary Gas turbines

LL – Metallic Mineral Processing Plants

OOO – Nonmetallic Mineral Processing Plants

UUU – Calciners and Dryers in Mineral Industries

**III – Compression Ignition Internal Combustion
Engines**

JJJJ – Spark Ignition Internal Combustion Engines

KKKK – Stationary Combustion Turbines

Area Source NESHAPs (40 CFR Part 63)

6H's – Paint Stripping and Miscellaneous Surface Coating (includes Autobody shops)

6W's – Plating/Polishing

6X's – Metal Fabrication/Finishing

6Z's – Aluminum, Copper and other non-ferrous Foundries

7C's – Paint Manufacturers

7D's – Prepared Feed Manufacturers.

4Z's (RICE) – Diesel and Natural Gas Engines.

-Each one contains a specific Compliance Date.

-Must submit INITIAL NOTIFICATION.

-Brochures available at

www.epa.gov/ttn/atw/area/arearules.html

Fees

- Application Fee (Non-refundable)
- Permit Processing Fee (not applicable to Class III sources or transfers)
- Annual Fee
- Emissions Fee (only for Class I sources)

*Fees for 2016 are posted on our website.

*Fees are adjusted annually by the Consumer Price Index (CPI).

Renewals

Permits valid for 5 years.

Letters to renew permits are mailed at least couple of months before the permit expiration date.



Revisions/Transfers do not start the clock.

Permit Changes

TYPES:

-Permit Revision: Changes in equipment, process, products.

-Permit Transfer: Ownership or facility name change

Permit Revision Application

- Same application form as for “New” permits, but check “Revision” box.
- Same information needed as for “New” permits, but only in relation to changes and or modifications.
- Revision application fee applicable to Class I permits only.

Permit Transfers

- Same Application form but check “Transfer” box.
- Apply before the transfer occurs.
- No processing fee associated with transfers.
- Transfers cannot be used for location changes, a new permit must be issued.

Permit Issuance Timeframes

- Mandatory Public Notice period of 30 days for new permits, significant revisions and renewals.
- Class I permits have an additional mandatory EPA review period of 45 days.
- Permit processing time depends on the complexity and the completeness of the application.

IMPORTANT

- New sources subject to Pinal County's permitting thresholds are required to obtain an air quality industrial permit before starting construction and or operation of an emission unit.
- Current permit holders are required to obtain a revised permit before making any modifications or changes.
- When in doubt call.

Who to call?

Kale Walch, Senior Permit Engineer

(520) 866-6860

kale.walch@pinalcountyaz.gov

Anu Jain, Permit Engineer

(520) 866-6931

anu.jain@pinalcountyaz.gov

QUESTIONS?