



2019 ADEQ Air Quality Compliance Workshop



ADEQ Air Quality Compliance Workshop

Wayne Bixler, Permit Engineer



Types of Air Quality Permits

Registration

myDEQ General Permits (C&S, CBP, HMAP)

Non-myDEQ General Permits (SVEU, Air Curtain Incinerator)

Individual Permits

Class II, SM80

Class I



CERTIFICATION OF TRUTH, ACCURACY AND COMPLETENESS

Any document required to be submitted by this General Permit, including reports, shall contain a certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under this part shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

I Certification of Truth, Accuracy, and Completeness

Any application form, report, or compliance certification submitted pursuant to AAC Title 18 Chapter 2 shall contain certification by a responsible official of truth, accuracy, and completeness.

Report Type:
(check all that apply)

- Compliance Report
- Monthly Report
- Semiannual Compliance Certification
- Semiannual Compliance Report
- Annual Compliance Certification
- Other (specify): _____

Period Covered:
(provide exact dates) _____

Company/Customer Name : _____

Place/Facility Name : _____

Permit / LTF Number: _____

Responsible Official Name: _____

Title: _____

I certify that based on information and belief formed after reasonable inquiry, the statements and information contained in this submittal are true, accurate, and complete.

Signature: _____ Date: _____



<http://www.azdeq.gov/forms>

Forms

The following is a listing of some of the forms and applications ADEQ offers.

You use the search box to find forms by title or you can view the listing below that is sorted by name.

Displaying 1 - 298 of 298.

Search

APPLY

0-100 >

208 Consistency Review Authorization Form | [Download >](#)

A-B

Air Curtain Incinerators (ACIs) General Permit Application | [Download >](#)

Air Quality Change of Responsible Official Form | [Download >](#)

Air Quality Class I Permit Application | [Download >](#)

Air Quality Class II Permit Application | [Download >](#)

Air Quality Division Annual/Semiannual Deviation and Monitoring Report | [Download >](#)

Air Quality Division Certification of Truth, Accuracy, and Completeness Form | [Download >](#)

Air Quality Division Excess Emissions Report Form | [Download >](#)

Air Quality Division GP - Portable Source Notice of Equipment Transfer | [Download >](#)

Air Quality Division Individual Permit - Portable Source Notice of Equipment Transfer | [Download >](#)

Air Quality Division Upset Condition Deviation Report | [Download >](#)

Air Quality Dry Cleaner Registration Application | [Download >](#)

Air Quality Standard Registration Application | [Download >](#)

Alternative Medical Waste Treatment Method Registration Application | [Download >](#)



Excess Emissions and Permit Deviation Reporting

What is an excess emission?

“Excess emissions” –

means emissions of an air pollutant in excess of an emission standard as measured by the compliance test method applicable to such emission standard.

[A.A.C. R18-2-101.50]



REPORTING OF EXCESS EMISSIONS IS A TWO STEP PROCESS

- an initial notification within 24 hours, and
- a detailed follow up report within 72

Step One – Initial (24 hr) Notification

Notification by telephone or facsimile ***within 24 hours*** of the time when the Permittee first learned of the occurrence of excess emissions.

The initial notification shall include all available information as specified below.

Phone: 602-771-4109

FAX: 602-771-2299

Step Two - Detailed Follow Up Report

Within **72 hours of the initial notification**, the Permittee shall submit a detailed written excess emissions report, containing:

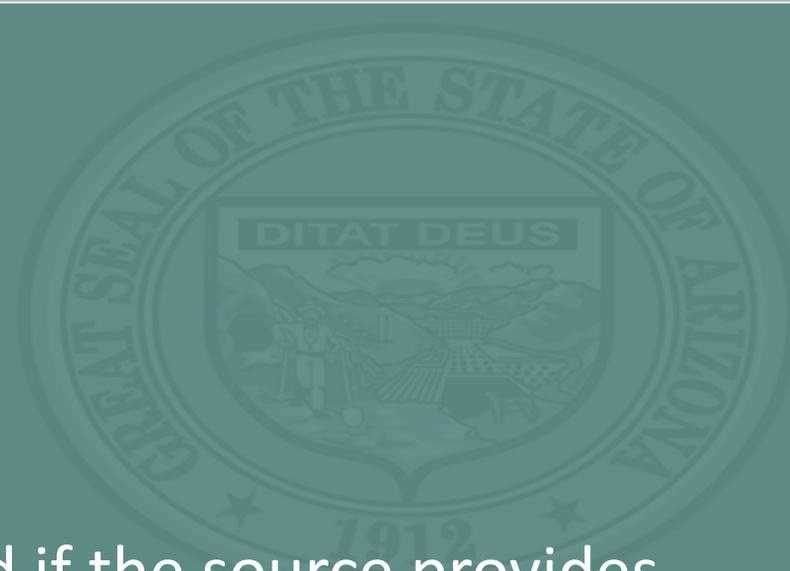
- (1) Identity of each stack or other emission point where the excess emissions occurred;
- (2) Magnitude of the excess emissions expressed
in the units of the applicable emission limitation
and the operating data and calculations used in determining
the magnitude of the excess emissions;
- (3) Date, time and duration, or expected duration, of the excess emissions;
- (4) Identity of the equipment from which the excess emissions emanated;



Detailed Follow Up Report (CONTINUED)

- (5) Nature and cause of such emissions;
- (6) If the excess emissions were the result of a malfunction, steps taken to remedy the malfunction and the steps taken or planned to prevent the recurrence of such malfunctions; and
- (7) Steps taken to limit the excess emissions.
- (8) If the excess emissions resulted from start-up or malfunction, the report shall contain a list of the steps taken to comply with the permit procedures.





Continuous or Recurring Excess Emissions

The notification requirements shall be satisfied if the source provides the required two step notification and includes in the notification an estimate of the time the excess emissions will continue.

Excess emissions occurring after the estimated time period, or changes in the nature of the emissions as originally reported, shall require additional 24 and 72 hour notifications.

Permit Deviations Reporting



What is a permit deviation?

- A permit deviation occurs when there is a departure from any permit term.
(It is a deviation from your permit)
- A permit deviation may be a nonconformity to permit terms that establish:
 - ✓ emission limitations or standards,
 - ✓ monitoring,
 - ✓ recordkeeping,
 - ✓ reporting,
 - ✓ or any other requirement
- A permit deviation is not necessarily a violation.



Permit Deviations Reporting

The Permittee is required to promptly report deviations from permit requirements.

The permit deviation report shall include

- the probable cause of deviation, and
- any corrective actions or preventive measures taken.

“Prompt” is defined in your permit...



Permit Deviations Reporting

“Prompt” reporting...
what is prompt?

- Where the applicable requirements contains a definition of prompt or otherwise specifies a timeframe for reporting deviations, that definition or time frame shall govern.

....OR...

Permit Deviations Reporting

“Prompt” reporting...

what is prompt?

Where the applicable requirement does not address the timeframe for reporting deviations, prompt reporting is in accordance with the following schedule:

- Notice that complies with the 24 and 72 hour requirement is prompt for deviations that constitute excess emissions;
- Notice regarding malfunctions or breakdowns of pollution control equipment or emissions monitoring systems that are submitted within two working days of discovery shall be considered prompt; and
- Notice of permit conditions identified in Attachment “B” that are submitted within two working days of discovery shall be considered prompt.

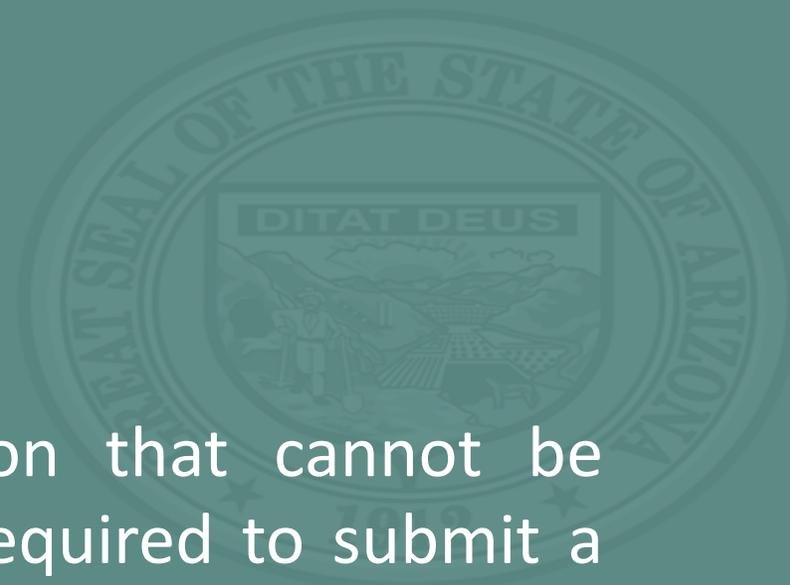
...OR...

Permit Deviations Reporting

“Prompt” reporting...
what is prompt?

- Except as provided above, notice included with your annual or semiannual compliance certification is prompt for all other types of deviation.





Compliance Schedule

For any excess emission or permit deviation that cannot be corrected within 72 hours, the Permittee is required to submit a compliance schedule to the Director within 21 days of such occurrence. The compliance schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with the permit terms or conditions that have been violated.



Material Permit Conditions

What is a material permit condition?

You can recognize a material permit condition in your permit as underlined and italicized text.

Material permit conditions meet one (or more) of the following five criteria:

1. It is an enforceable emission standard imposed to avoid classification as a major modification or major source or to avoid triggering any other applicable requirement;
2. It is a requirement for installation or certification of a monitoring device;
3. It is a requirement for installation of air pollutant control equipment;
4. It is a requirement for the operation of control equipment;
5. It is an opacity standard required by Section 111, or Title I, Part C or D of the Clean Air Act.

An emission standard imposed to avoid triggering an applicable requirement...

The Permittee shall not operate the crushing and screening plant equipment such that the throughput exceeds 4,095 tons per day (tpd).

The Permittee shall not operate the concrete batch plant equipment such that the throughput exceeds 1,275 cubic yards per day (yd³/day).

Installation or certification of a monitoring device...

Emergency Engines - Operating Requirements

*The Permittee shall install a non-resettable hour meter
prior to startup of the engine.*

Installation and operation of air pollution control equipment...

If an engine is equipped with a diesel particulate filter to comply with the emission standards, the Permittee shall install, maintain, and operate the particulate filter in accordance with good air pollution control practices for minimizing emissions.

For truck-mix facilities, a rubber sleeve, baghouse, or equivalent, shall be installed, maintained and operated in accordance with the vendor specifications on the product delivery system to minimize visible emissions during material transfer to trucks.

Installation and operation of air pollution control equipment...

The Permittee shall install, calibrate, maintain, and operate monitoring devices which can be used to determine daily the process weight of sand, gravel or crushed stone produced. The weighing devices shall have an accuracy of plus or minus 5 percent over their operating range.

Operation of pollution control equipment

Water spray bars or equivalent control equipment shall be used whenever the equipment is operating, or material shall be adequately wet to minimize visible emissions to the extent practical.

An opacity standard, from 40 CFR 60 Subpart 000...

The Permittee shall not allow to be discharged into the atmosphere from any crusher which commenced construction, modification, or reconstruction after August 31, 1983, but before April 22, 2008, at which a capture system is not used, any fugitive emissions which exhibit visible emissions greater than 15 percent opacity.

[40 CFR 60.672(b) and A.A.C. R18-2-331.A.3.f]

[Material permit conditions are indicated by underline and italics]

The Permittee shall not allow to be discharged into the atmosphere from any crusher which commenced construction, modification, or reconstruction on or after April 22, 2008, at which a capture system is not used, any fugitive emissions which exhibit visible emissions greater than 12 percent opacity.

[40 CFR 60.672(b) and A.A.C. R18-2-331.A.3.f]

[Material permit conditions are indicated by underline and italics]

Welcome To



Arizona Department of Environmental Quality

Online Portal





General Permit Applications

Hot Mix Asphalt

Concrete Batch Plant

Crushing and Screening

General Permit Report Submittals

Compliance Certifications

Move Notices

Individual Permit Report Submittals

Compliance Certifications (In Progress)

Excess Emission Reports (Projected July 2019)

Permit Deviations (Projected July 2019)

Air Permit Writer will reach out to you with a draft compliance certification. Make sure ADEQ has the correct contact info for responsible official or compliance contacts! If not sure, email airpermits@azdeq.gov.

Contact Information

Individual Permits

602-771-4420

General Permits

844-827-4768



Casey Bryan

Source Inspector

COMPLIANCE WITH PERMIT CONDITIONS (by obtaining a permit, you have agreed to this)

The Permittee shall comply with all conditions of this General Permit including all applicable requirements of Arizona air quality statutes and the air quality rules. Any permit noncompliance is grounds for enforcement action, for permit termination or revocation, or for denial of a renewal application. In addition, non-compliance with any federally enforceable requirements constitutes a violation of the Clean Air Act.

It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

INSPECTION AND ENTRY (permitted sources)

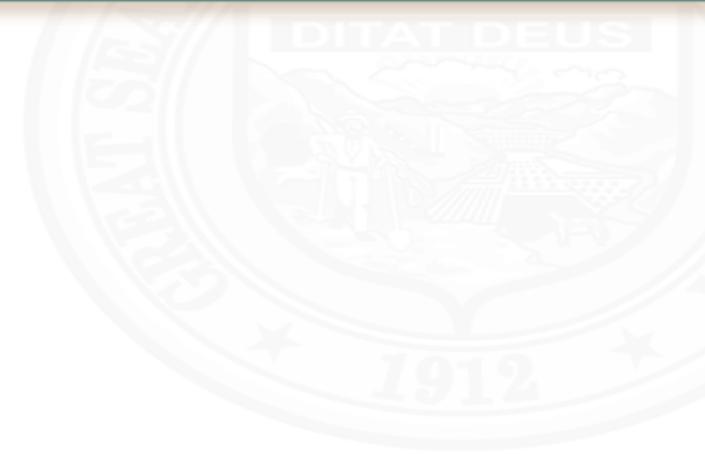
Upon presentation of credentials and other documents as may be required by law, Permittee shall allow the Department or an authorized representative (including an authorized contractor acting as a representative of the Department), to perform the following:

- A. Enter upon the Permittee's premises where a source is located or emissions-related activity is conducted, or where records are required to be kept under the conditions of this General Permit;
- B. Have access to and copy, at reasonable times, any records that must be kept under conditions of this General Permit;
- C. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this General Permit;
- D. Sample or monitor, at reasonable times, substances or parameters at any location for the purpose of assuring compliance with this General Permit or other applicable requirements; and
- E. Record any inspection by use of written, electronic, magnetic and photographic media.

If access denied, request search warrant



- Source Permit & ATOs (Authority to Operate)
- Production and Operating Records
- Method 9 Field Certifications (Smoke School)
- Visible Emission Monitoring Documentation
- Water Truck Log/Fugitive Dust Controls
- O&M Logs



Permit Conditions versus Checklist

Permit Conditions (100+ pages)

	General Permit for Crushing and Screening Plants p. 6 of 134 April 24, 2017
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Checklist (10-40+ pages)

ATTACHMENT B: FACILITYWIDE REQUIREMENTS	
II. CONDITIONS FOR COVERAGE	
Attachment B, Section II.B <i>The Permittee shall not operate the equipment covered under this permit with any other concrete batch plant, or crushing & screening plant not covered by this permit if they meet the definition of a stationary source under A.A.C. R18-2-101.140.</i>	Choose an item.
III. FACILITY WIDE REQUIREMENTS	
Operational Limitations Attachment B, Section III.A.1 <i>The Permittee shall not operate the equipment identified in the ATO for more than the number of annual hours limit specified in the ATO.</i>	Choose an item.
Operational Limitations Attachment B, Section III.A.2 The Permittee shall operate and maintain all equipment in accordance with manufacturer's specifications.	Choose an item.
PM₁₀ Attainment Area Throughput Limitations Attachment B, Section III.C.1 <i>The Permittee shall not operate the crushing and screening plant such that the throughput exceeds 6,500 tons per day (tpd).</i>	Choose an item.
PM₁₀ Attainment Area Throughput Limitations Attachment B, Section III.C.2 <i>The Permittee shall not operate the co-located concrete batch plant such that the throughput exceeds 1,275 cubic yards per day (yd³/day).</i>	Choose an item.
PM₁₀ Nonattainment Area Throughput Limitations Standalone Crushing and Screening Plant (No Co-location of Concrete Batch Plant). Attachment B, Section III.D.1 <i>The Permittee shall not operate the crushing and screening plant equipment such that the throughput exceeds 4,410 tons per day (tpd).</i>	Choose an item.
PM₁₀ Nonattainment Area Throughput Limitations	Choose an item.

Rated Design Capacity for calculating PTE

DITAT DEUS

*Capacities Capacity Short Tons Per Hour Passing Thru Crusher

Austin Weston Jan

Size	**DISCHARGE SETTING (CLOSED STROKE)														
	3/4"	1"	1 1/2"	2"	2 1/2"	3"	4"	5"	6"	7"	8"	9"	10"	11"	12"
1020	10	15	24	33	44	54									
1024	12	18	27	40	54	66									
1036	19	29	48	66	90	105									
1524			32	44	60	80	105								
1536			50	74	96	120	150								
2036				80	100	135	180	222	270						
2540						150	210	280	350						
3240							225	300	375	410	450				
4248								360	450	525	600	680	750	830	910

*Capacities shown are those expected for material weighing 100 lb.cu.ft. and constant maximum feed.
For other conditions capacity will vary. Consult factory for expected tonnage in your material.

**Consult factory for other settings

Long Tons Per Hr = STPH × 0.893

Yards Per Hour = STPH × 0.74

Metric Ton Per Hr = STPH × 0.907

Actual Running Conditions: Throughput
Limitation/Emission Inventory

Maximum Capacity = PTE:
Filing ATO or Source Permit



Performance Testing / Stack Testing

- Performance Test protocols must be submitted to ADEQ 14 working days prior to start of test.
- If no prior test, Initial Performance Test within 60 days after achieving maximum production, but no later than 180 days of initial start up or permit issuance;
 - Otherwise within 12 months of permit issuance.
- Test reports must be submitted to ADEQ within 30 days after the test is performed.

- If your Hot Mix Asphalt Plant passes its performance test by more than 75% of the standard, no additional performance testing is required for the remainder of the permit term.
- If your HMAP does not pass the performance test by 75% of the standard, you must continue annual performance testing.
- What IS the STANDARD:
 - NSPS Drum Dryer: 0.04 grains per dry standard cubic foot
 - To pass by 75%: ≤ 0.01 grains per dry standard cubic foot
 - Non-NSPS Drum Dryer: $E=4.10 P^{0.67}$ (lbs/mass hour)
 - To pass by 75%: $\leq 0.25 \times 4.10 P^{0.67}$

- Any deviation from the EPA promulgated test methods shall be approved by ADEQ prior to start of testing.
- Hot mix asphalt plant semi-annual black light inspection results should be included with the performance test reports, per Mr. Kim.
- ADEQ's Performance Test Contact:
Mr. David Kim
Office: 602-771-4365
Email: kim.david@azdeq.gov

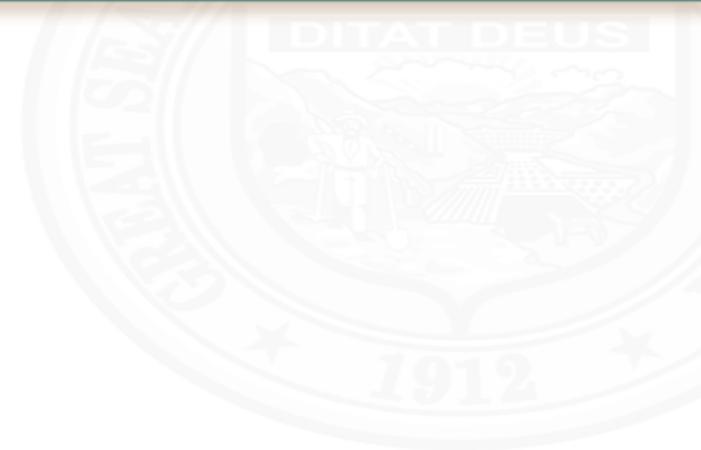


Asbestos

- If you conduct any renovation and/or demolition activity, an asbestos survey must be conducted to determine the presence or absence of asbestos-containing material, **REGARDLESS** of the age of the facility.
- Definition of Demolition in Asbestos NESHAP - The **wrecking or taking out of any load-supporting structural member** of a facility together with any related handling operations or the intentional burning of any facility - Can be one load bearing wall or entire building.
- **Asbestos has never been banned for use in the United States**
- Only two types of applications were banned in the 1970's
 - Spray-Applied Surfacing (fireproofing, popcorn ceilings) and Thermal System Insulation (TSI)

ADEQ's Asbestos Contact:
Mr. Brian Jones 602-771-2333

Mr. Jones can provide information on asbestos training opportunities and applicable regulations.



The Environmental Information Association Arizona Chapter
sponsors Asbestos Seminars around the State

www.eia-az.org





Spray Painting Operations

R18-2-727. Standards of Performance for Spray Painting Operations

A. No person shall conduct any spray paint operation without minimizing organic solvent emissions. Such operations other than architectural coating and spot painting, shall be conducted in an enclosed area equipped with controls containing no less than 96% of the overspray.

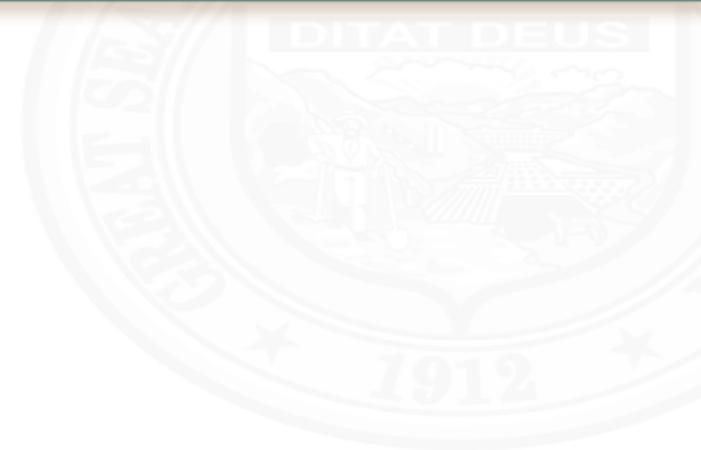
A.A.C. R18-2-702(B)(3)

Opacity of a plume or effluent greater than 20% in an area that is attainment or unclassifiable for each particulate matter standard

ADEQ Permitted sources have specific requirements.

Filters should be Installed





What is “Architectural coating”

A.A.C. R18-2-701.2 -

“Architectural coating” means a coating used commercially or industrially for residential, commercial or industrial buildings and their appurtenances, structural steel, and other fabrications such as storage tanks, bridges, beams and girders.



Abrasive Blasting Operations

R18-2-726. Standards of Performance for Sandblasting Operations

No person shall cause or permit sandblasting or other abrasive blasting without minimizing dust emissions to the atmosphere through the use of good modern practices. Examples of good modern practices include wet blasting and the use of effective enclosures with necessary dust collecting equipment.

A.A.C. R18-2-702(B)(3)

Opacity of a plume or effluent shall not be greater than 20% in an area that is attainment or unclassifiable for each particulate matter standard.

ADEQ Permitted sources have specific requirements.

... good modern practices for unconfined blasting:

Include the use of low PM-emitting blast media used in place of sand and other higher PM emitting blast media.

For example: crushed glass, specular hematite, steel or iron shot, aluminum oxide, copper slag and many of the CARB approved materials.

INVOICE P/S

Invoice No: N/A
Invoice Date: 07/02/18
Transaction #: 00297600
P/O #:
Salesperson:
Terms: Net 20th
Ship Via: Pickup

[Redacted] INC
Y 89
323

Bill To Account # MYER10
[Redacted] STING
89
323
Fax:
Page 1

Ship To
** SAME **

Item#	Description	Qty	B/O	UM	Unit Price	Total
SILSAND30	SAND SILICA, 30 GRIT 100 LB. NOT FOR SANDBLASTING	10.00	0.00	Ea	11.0000	110



Covered Loads

Department of Public Safety

28-1098. Vehicle loads; restrictions; civil penalties

A person shall not drive or move a vehicle on a highway unless the vehicle is constructed or loaded in a manner to prevent any of its load from dropping, sifting, leaking or otherwise escaping from the vehicle, except that Sand may be dropped for the purpose of securing traction.

Water or another substance may be sprinkled on a roadway in cleaning or maintaining the roadway.

A person shall not operate a vehicle on a highway with a load unless the load and any covering on the load are securely fastened in a manner to prevent the covering or load from becoming loose, detached or in any manner a hazard to other users of the highway.

If a person is found in violation of this section and the violation:

Does not cause any damage or injury and is the person's:

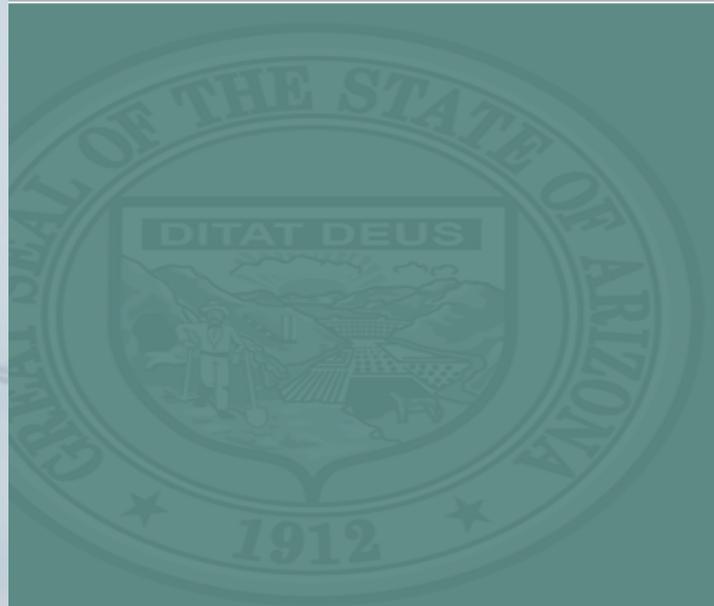
First violation in a sixty month period, the person is subject to a civil penalty of up to two hundred fifty dollars.

Second or subsequent violation in a sixty month period, the person is subject to a civil penalty of up to three hundred fifty dollars.

Results in an accident causing serious physical injury as defined in section 13-105 to another person, the person is subject to a civil penalty of up to five hundred dollars.

Results in an accident causing the death of another person, the person is subject to a civil penalty of up to one thousand dollars.







Rob Verville
Air Quality Source Inspector



What is ADEQ Air Quality Inspector Function?

To observe operating conditions of the Source,
inspect source specific equipment.

ADEQ has staff that conducts paperwork reviews
(compliance certifications, quarterly reports,
performance tests, etc.)

ADEQ Compliance Monitoring Strategy with EPA Title V sources and other selected sources

Physical Plant Inspection

Compliance Certification Review

Performance Test Review



Top Air Quality Violations Cited in 2018

Visible Emission Violations

Opacity greater than 20% or the applicable standard (excess emission)
Failure to have Method 9 observer onsite or oncall (permit deviation)



Air Pollution Control Violations

Failure to operate equipment per a permit condition

Failure to Conduct VE Survey

Failing to conduct weekly fugitive emissions monitoring
Failure to conduct monthly visible emission surveys

Failure to comply with other permit terms

Failure to Submit Reports, Compliance Certifications and Emission Inventory

Failure to report excess emissions or inadequately report

Failure to maintain air quality records

Other Air Quality violations

Asbestos NESHAP Violations

Failure to conduct performance tests (Stack Testing)

Unlawful Open Burning



Non-Road Engines

§ 89.2 Definitions.

Nonroad engine means:

(1) Except as discussed in paragraph (2) of this definition, a nonroad engine is any internal combustion engine:

(i) In or on a piece of equipment that is self-propelled or serves a dual purpose by both propelling itself and performing another function (such as garden tractors, off-highway mobile cranes and bulldozers); or

(ii) In or on a piece of equipment that is intended to be propelled while performing its function (such as lawnmowers and string trimmers); or

(iii) That, by itself or in or on a piece of equipment, is **portable or transportable, meaning designed to be and capable of being carried or moved from one location to another. Indicia of transportability include, but are not limited to, wheels, skids, carrying handles, dolly, trailer, or platform.**

§ 89.2 Definitions.

(2) An internal combustion engine is **not a nonroad engine if:**

(i) the engine is used to propel a motor vehicle or a vehicle used solely for competition, or is subject to standards promulgated under section 202 of the Act; or

(ii) the engine is regulated by a federal New Source Performance Standard promulgated under section 111 of the Act; or

§ 89.2 Definitions continued.

(iii) the engine otherwise included in paragraph (1)(iii) of this definition **remains or will remain at a location for more than 12 consecutive months** or a shorter period of time for an engine located at a seasonal source. **A location is any single site at a building, structure, facility, or installation. Any engine (or engines) that replaces an engine at a location and that is intended to perform the same or similar function as the engine replaced will be included in calculating the consecutive time period.** An engine located at a seasonal source is an engine that remains at a seasonal source during the full annual operating period of the seasonal source. A seasonal source is a stationary source that remains in a single location on a permanent basis (i.e., at least two years) and that operates at that single location approximately three months (or more) each year. This paragraph does not apply to an engine after the engine is removed from the location.

§ 89.1003 Prohibited acts.

(a) The following acts and the causing thereof are prohibited:

(5) For a person **to circumvent or attempt to circumvent the residence time requirements** of paragraph (2)(iii) of the nonroad engine definition in § 89.2

- Any engine (or engines) that replaces an engine at a location and that is intended to perform the same or similar function as the engine replaced will be included in calculating the consecutive time period.
- Cannot move NRE offsite, then back, to reset 12 month clock.

Nonroad engine log must contain the following information.

1. Date that the engine is brought to the facility;
2. Engine make;
3. Engine model;
4. Engine serial number;
5. Capacity of the engine; and
6. Date that the engine is removed from the facility.

If engine is not a non-road engine, add engine to Air Quality permit.

Operate engine according to permit requirements.

Permit requirements depend on dated of manufacture and horsepower.



Open Burn

Open Burn Permits follow-up from last year

ADEQ Agriculture Source Inspectors conducted inspections of all 60 jurisdictions that issue open burn permits throughout Arizona.

Burn permits are issued by local fire jurisdiction or ADEQ.

Exception: Maricopa, Pima & Pinal Counties and Tribal Lands have Authority to issue burn permits.

- Start ignition no earlier than one hour after sunrise and extinguish fire two hours before sunset.
- Burn only dry material.
- Maintain a clearance of 50 feet from any structure.
- Start the fire without use of items that can produce black smoke.
- Notify the local fire fighting agency prior to burning.
- Adhere to all local fire restrictions.
- Burn only during favorable wind conditions.
- Remain at the site of the fire until completely extinguished, and have equipment available to control the burn and put out the fire if necessary.
- Have a copy of the burn permit on site.

Proper Disposal of Flags (open burning)

Arizona Revised Statutes 49-501 - Unlawful Open Burning; exceptions;
civil penalty; definition



VFW disposing of flags

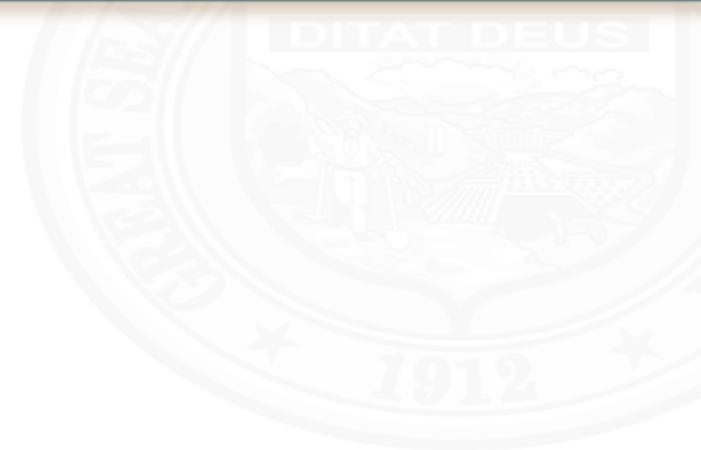




Non-permit stack opacity

A.A.C. R18-2-702(B)(3) **(Arizona Requirement)**

The opacity of any plume or effluent from a source shall not be greater than 20% in an area that is attainment or unclassifiable for each particulate matter standard.



20% opacity limit for these stacks



Stacks can be anywhere



Stacks can be anywhere



General Dust Control Requirements

Road Construction Projects
General Construction Sites

R18-2-604. Open Areas, Dry Washes, or Riverbeds (**Arizona Requirement**)

A. No person shall cause, suffer, allow, or permit a building or its appurtenances, or a building or subdivision site, or a driveway, or a parking area, or a vacant lot or sales lot, or an urban or suburban open area to be constructed, used, altered, repaired, demolished, cleared, or leveled, or the earth to be moved or excavated, without taking reasonable precautions to limit excessive amounts of particulate matter from becoming airborne. Dust and other types of air contaminants shall be kept to a minimum by good modern practices such as using an approved dust suppressant or adhesive soil stabilizer, paving, covering, landscaping, continuous wetting, detouring, barring access, or other acceptable means.

ADEQ Permitted sources have specific requirements.

Continuous Wetting means? Once per day? When the Inspector Arrives?

Merriam-Webster

Definition of *continuous*

1 : marked by uninterrupted extension in space, time, or sequence

// The batteries provide enough power for up to five hours of *continuous* use.

Oxford Dictionary

adjective

1. forming an unbroken whole; without interruption:
"the whole performance is enacted in one continuous movement"

Dictionary.com

adjective

- 1 uninterrupted in time; without cessation:
continuous coughing during the concert.

B. No person shall cause, suffer, allow, or permit a vacant lot, or an urban or suburban open area, to be driven over or used by motor vehicles, trucks, cars, cycles, bikes, or buggies, or by animals such as horses, **without taking reasonable precautions to limit excessive amounts of particulates from becoming airborne.** Dust shall be kept to a minimum by using an approved dust suppressant, or adhesive soil stabilizer, or by paving, or by barring access to the property, or by other acceptable means.

C. No person shall operate a motor vehicle for recreational purposes in a dry wash, riverbed or open area in such a way as to cause or contribute to visible dust emissions which then **cross property lines** into a residential, recreational, institutional, educational, retail sales, hotel or business premises. For purposes of this subsection “motor vehicles” shall include, but not be limited to trucks, cars, cycles, bikes, buggies and 3-wheelers.

Any person who violates the provisions of this subsection shall be subject to prosecution under A.R.S. § 49-463.

ADEQ Permitted sources have specific requirements.

Be trained in accordance with the Comprehensive Dust Control Training Class conducted or approved by the Director, successfully complete, at least once every three years, such Comprehensive Dust Control Training Class and have a valid dust training certification identification card readily accessible on-site while acting as a Fugitive Dust Control Technician.

Be authorized by the Permittee to install, maintain, and use fugitive dust control measures, deploy resources, and shutdown or modify activities as needed.

Be on-site at all times during primary dust-generating operations related to the purposes for which the permit was obtained.

Be certified to determine opacity as visible emissions in accordance with the provisions of the EPA Method 9.

Be authorized by the Permittee to ensure that the site superintendent or other designated on-site representative of the Permittee and water truck and water pull drivers for each site be trained in accordance with the Basic Dust Control Training Class conducted or approved by the Director with jurisdiction over the site and successfully complete, at least once every three years, such Basic Dust Control Training Class.

ADEQ Crushing & Screening Permit - Attachment E: Section I

The Permittee shall provide and maintain, readily available on-site at all times, an O&M plan for equipment associated with any process fugitive emissions and fugitive dust control measures (i.e. gravel pads, wheel washers, truck washers, rumble grates, watering systems, and street sweepers) that are implemented pursuant to these conditions.

All ADEQ General Permits for CBP, C&S and HMAP have attachments for Pinal, Pima and Maricopa County operations. Those attachments have more stringent operating requirements.

ADEQ Crushing & Screening Permit - Attachment E: Section V

The Permittee shall submit, to the Director, a Dust Control Plan that describes all fugitive dust control measures to be implemented, in order to comply with this permit.

(Through myDEQ)

Facility Information Sign

The Permittee shall erect and maintain a facility information sign at the main entrance such that members of the public can easily view and read the sign at all times. Such sign shall have a white background, have black block lettering that is at least four inches high, and shall contain at least all of the following information:

Facility name and Permittee's name;

Current number of the air quality permit or of authority to operate under a general permit;

Name and local phone number of the person(s) responsible for dust control matters; and

Text stating: "Dust Complaints? Call Maricopa County Air Quality Department – (602) 372-2703, or the Arizona Department of Environmental quality at (602) 771-2286."

ADEQ Crushing & Screening Permit - Attachment E: Section V

For emissions that are not already regulated by opacity limit, the Permittee shall not discharge or cause or allow to be discharged into the ambient air fugitive dust emissions exceeding 20 percent opacity.

The Permittee shall not cause or allow fugitive dust emissions from any active operation, open storage pile, or disturbed surface area associated with such facility such that the presence of such fugitive dust emissions remain visible in the atmosphere beyond the property line of such facility.

Dust Control Tech

The Permittee with a rated or permitted capacity of 25 tons or more of material per hour or with five acres or more of disturbed surface area subject to a permit, whichever is greater, shall have in place a Fugitive Dust Control Technician.

Be authorized by the Permittee to have full authority to ensure that fugitive dust control measures are implemented on-site and to conduct routine inspections, recordkeeping, and reporting to ensure that all fugitive dust control measures are installed, maintained, and used in compliance with this rule.



Do you operate sufficient water trucks at your site?

Do you have water log?

No water truck at site, it's on the grade.

H₂O, Agua, dihydrogen monoxide

Water spray bars installed at inlets, outlets, transfer points.
Must be installed, operate as needed

Adequately wetting material entering primary crusher appears to
have most significant impact on reducing dust generation.



Are your water sprays effective?





Routine dust control and cleanup?

Trackout Control



Trackout Control



Trackout Control

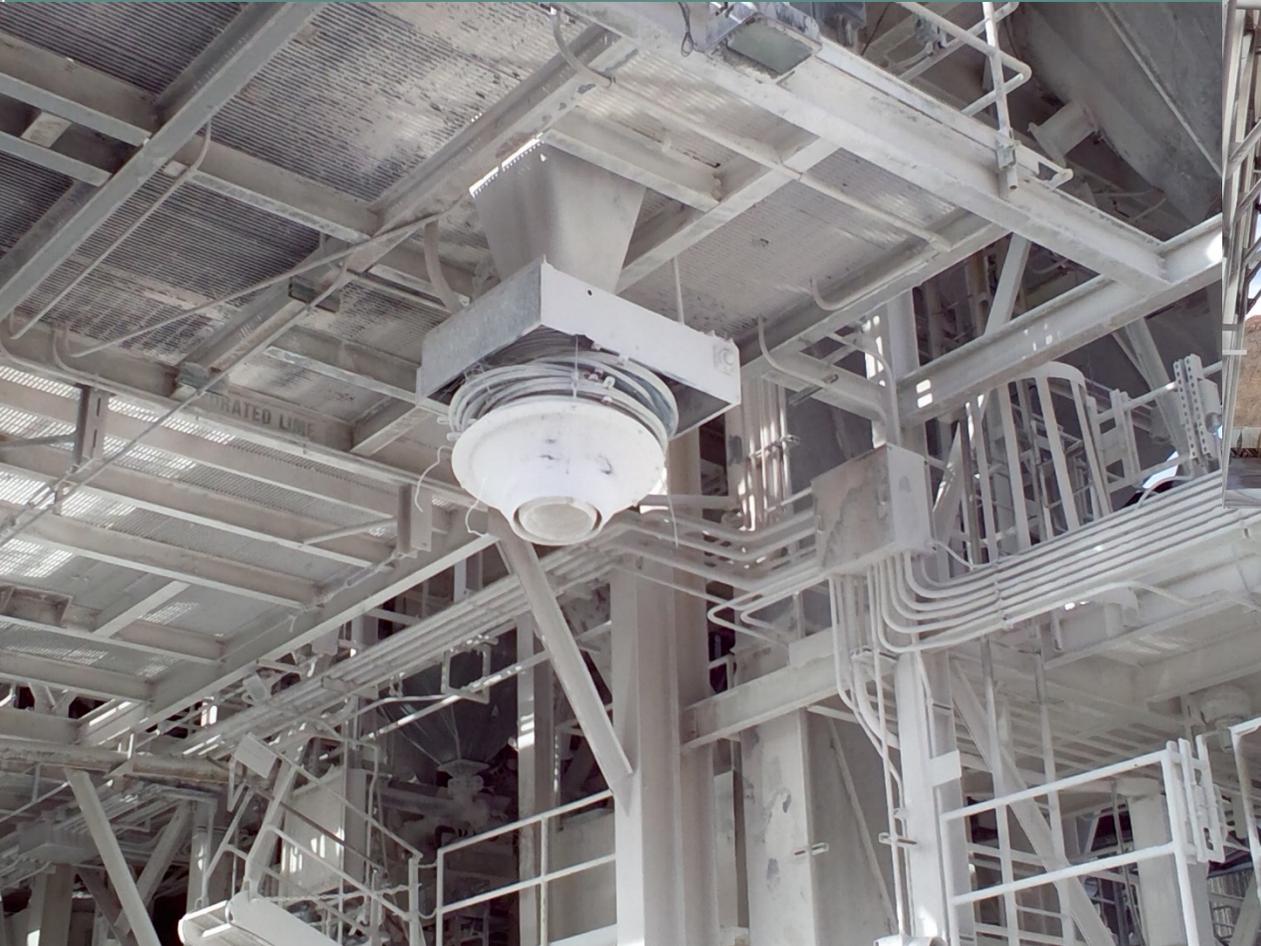






Equipment in Good Repair?

Expandable loading shoot needed repair.





Began additional wetting during inspection.



Evidence of Wetting?



No evidence of wetting



Safety Hazards during inspections



Properly contain and transport chemicals

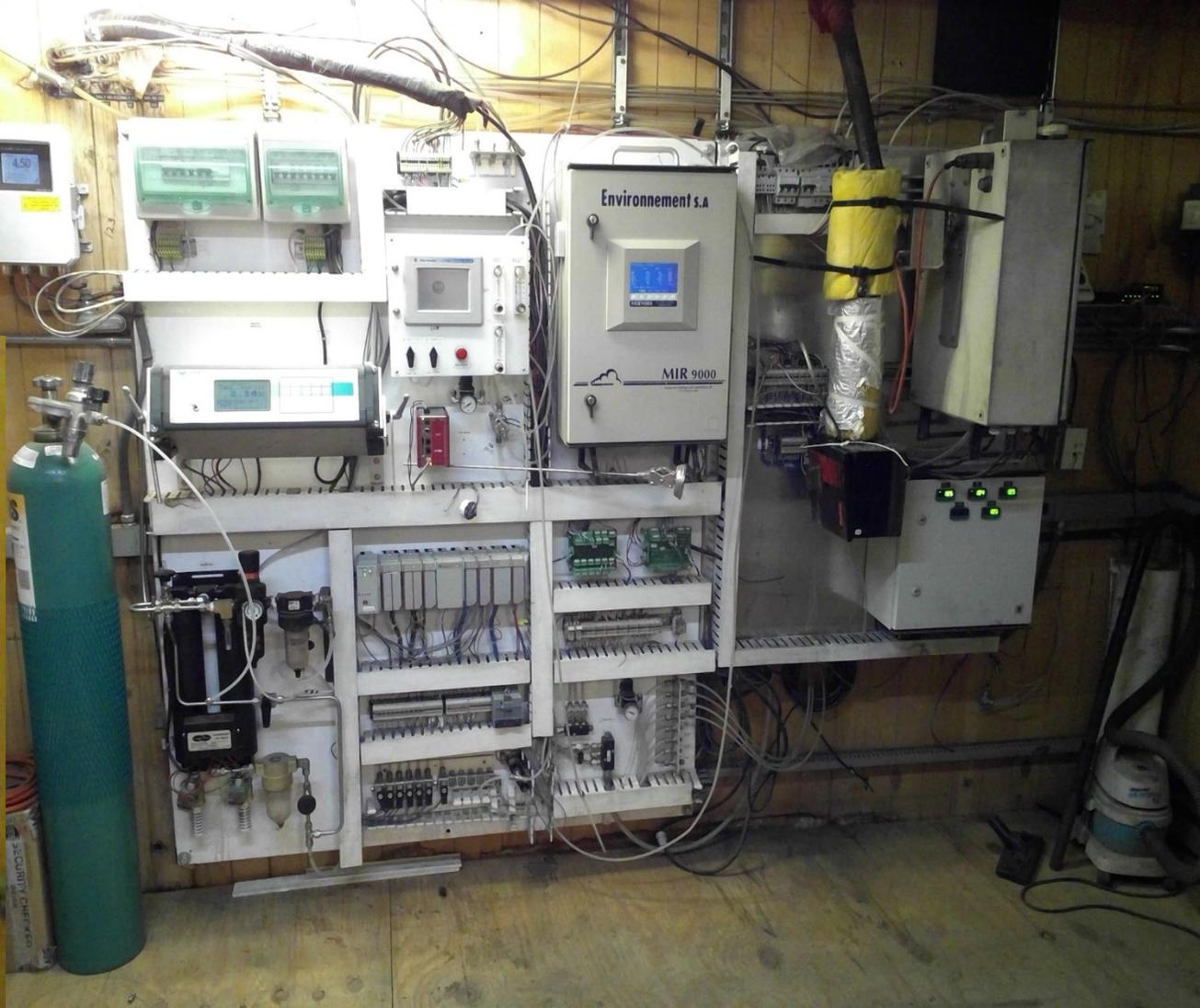
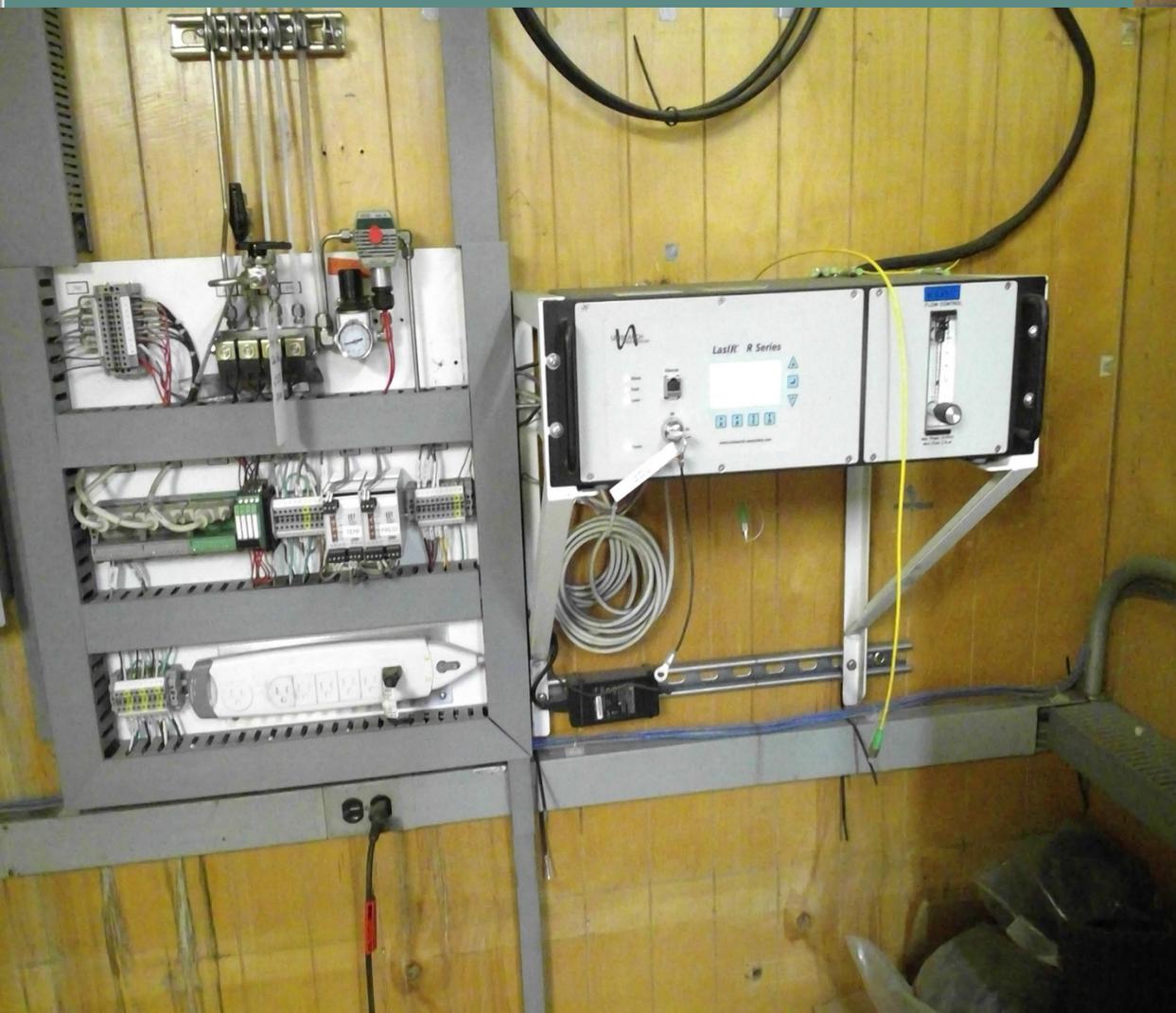
Some Sources have rigorous dust control requirements.

A rail car of coal is being tipped inside a building with water sprays operating.



Continuous Emission Monitoring System (CEMS)

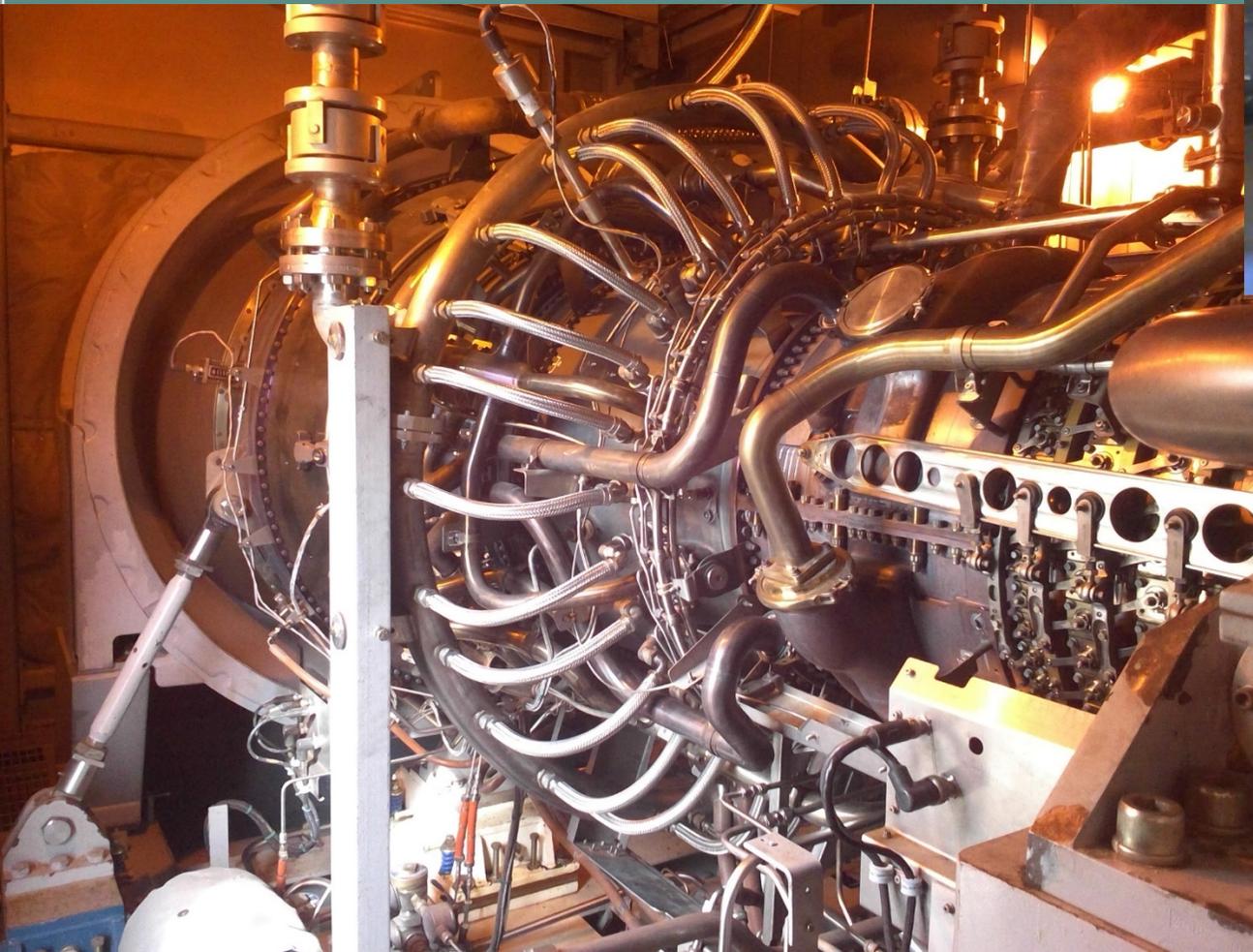
Continuous Opacity Monitoring System (COMS)



What type of engine do you operate?

Reciprocating internal combustion engine (RICE) diesel

Stationary gas turbine, natural gas



What type of engine do you operate?

Emergency Diesel Fire Pump (RICE)

Spark ignition (natural gas, propane or unleaded)



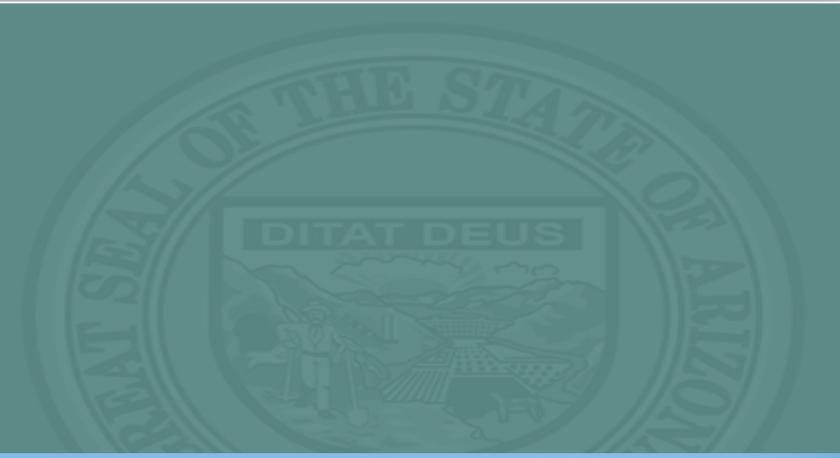
Digital Opacity Compliance System (DOCS)

Can use DOCS system at significant distance, can be used in inclement weather, can be used at night.

Over Long Distances
This observation 3,920ft



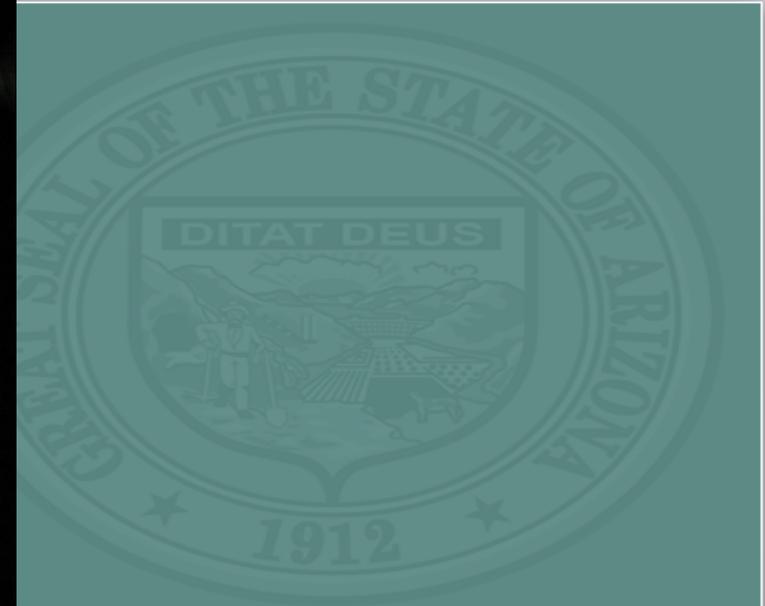
Over Long Distances
This observation 11,200ft





Through Rain & Snow





At night



Turned off equipment during DOCS observations

Method 9 average opacity 57.5%

5



File Name IMG_3318.JPG Camera Mfg/Model Canon Canon PowerShot SX60 HS Date Taken 5/8/2018 2:20:42 PM

Notes

80



File Name IMG_3303.JPG Camera Mfg/Model Canon Canon PowerShot SX60 HS Date Taken 5/8/2018 2:16:57 PM

Notes

Complaint follow up from last year

ADEQ responded to 562 complaints in 2018.

How to handle these complaints?

“The air from the dryer is blowing toxic chemicals onto my property. They need to put a regular filter hose on their dryer and washer and point it away from my house. Please. The entire neighborhood is affected, I get hit the worst because I am right next door. The air quality disruption is so bad I can smell it in my house with all the windows and doors shut. Be careful, they are cartel drug dealers. My neighbors are violent and aggressive they have destroyed my property multiple times”

Transferred to AZ DPS Drug Unit.



“Planes leaving trails of white cloudy aerosol up in the sky. Today they started on the NS horizon, usually 2 at a time. There seems to be a pattern to block the sun.” Refer to ADEQ Contrail Webpage

What are those white lines in the sky?

Revised on: March 8, 2018 - 1:24pm

If you've ever seen a jet fly across the sky, you may have noticed that there is sometimes a thin white line behind it. These clouds are contrails, short for condensation trails.

Water vapor is one of the byproducts of jet fuel combustion and will turn into ice crystals in the cold air at the high elevations where jet airplanes fly. Those ice crystals create a cloud (the contrail), which does not pose any public health risk.

Contrails can evaporate quickly if humidity is low, or they can linger, and even grow by taking in water from the surrounding atmosphere, when humidity is high.

These contrails may appear to be grid-shaped, which is due to flight patterns generally following routes or corridors established by the National Airspace System (NAS). Just as there are highways for vehicles crisscrossing the United States, there are similar corridors in the sky most air travel follows.

You may sometimes hear contrails mistakenly called chemtrails. Occasionally, ADEQ is contacted by members of the public who wonder if these contrails might contain harmful chemicals or metals. All the data ADEQ has gathered from air, soil, and water across the state of Arizona do not show any evidence of this.

Example of ADEQ Air Monitoring Data | [View Data >](#)

CONTACT

[Leave Feedback >](#)



HOURLY AIR QUALITY FORECAST

[Phoenix >](#)

[Yuma >](#)

[Nogales >](#)

[Tucson >](#)

[Understanding the Hourly Forecast >](#)



SEE MORE

[Air Pollutants Defined >](#)

[What to Do When AQ Is at Unhealthy Levels? >](#)

[What Is Inversion and How Does It Affect AQ? >](#)

[What Is Area A & B? >](#)

[Contrails Vs. Chemtrails >](#)

[Air Quality Flag Program >](#)

[Air Quality Monitoring >](#)



“Tesla is charging vehicles utilizing a portable diesel generator. Vehicles with Plates saying "ZERO EMISSIONS". Vehicles that receive special dispensation from the State based on their "Zero Emissions". I filed Complaint #276311 with Maricopa County DEQ who investigated and reported the generator fell within their jurisdiction and it was in compliance. They shared my view of the hypocrisy of this and suggested ADEQ was perhaps the proper authority to address the legality. Are there any State regulations that would prevent a Tesla owner from pulling a trailer mounted diesel generator plugged into his car down the HOV lane on the way to the bank to deposit their State refunds while paying \$0 in Highway Taxes?”

How would you classify the diesel generator? Nonroad

When you charge a Tesla, is it Zero Emissions?

What is fuel source of electricity? Coal, Natural Gas, Nuclear, Solar, Wind or something else.

I want to remain anonymous because in small towns like ours, retribution is huge, when you snitch on someone. But my health and the health of the entire neighborhood surrounding the plant. It got so bad and I could not breath my throat swelled up just from going to check the mail, that I had to give myself and Epi-pen shot. The dust, sand, concrete dust is horrible. The air that comes in always comes in from the south and goes right over the plant and continues north spreading this deadly dust everywhere. The plant, used to water all the streets, water down the roads, their vast acreage of dirt property many many times per day. With all the people who live immediately north of the plant, even when they use to water down the roads, the dirty filthy air would rip straight away north of the plant and go (down the alley that runs South and North that is between the two streets. If you were to put one of your Air Quality portable trailer air stations in the alley that runs south to north immediately north of the plant down to where that alley runs into another alley that runs west to east. Without telling the town who tells their friends at the plant what you are doing. Don' let them know your plans to test the air or they will then start watering down again LIKE THEY WERE TOLD THEY HAD TO DO. The filthy air that goes into every home is the dirtiest air and many of the people are now suffering with acute chronic lung problems. Please do something to stop or someone may die, yes it is that bad. Thank you

ADEQ Conducted Site Inspection of permitted CBP

SEE NEXT SLIDE



Complaint findings from previous slide



Run-off from a CBP, started as air complaint
Refer to Water Quality Division





Forward to Pima County Air

Forward to ADEQ Waste Programs





Odor Complaint at Weed Farm

No odors detected by Inspector,
Source has two different odor eaters.
Approvals from AZ DHS: To Operate,
Cultivate, Dispense & make Edibles.
County Conditional Use Permit and
State Tax License.

Voluntary

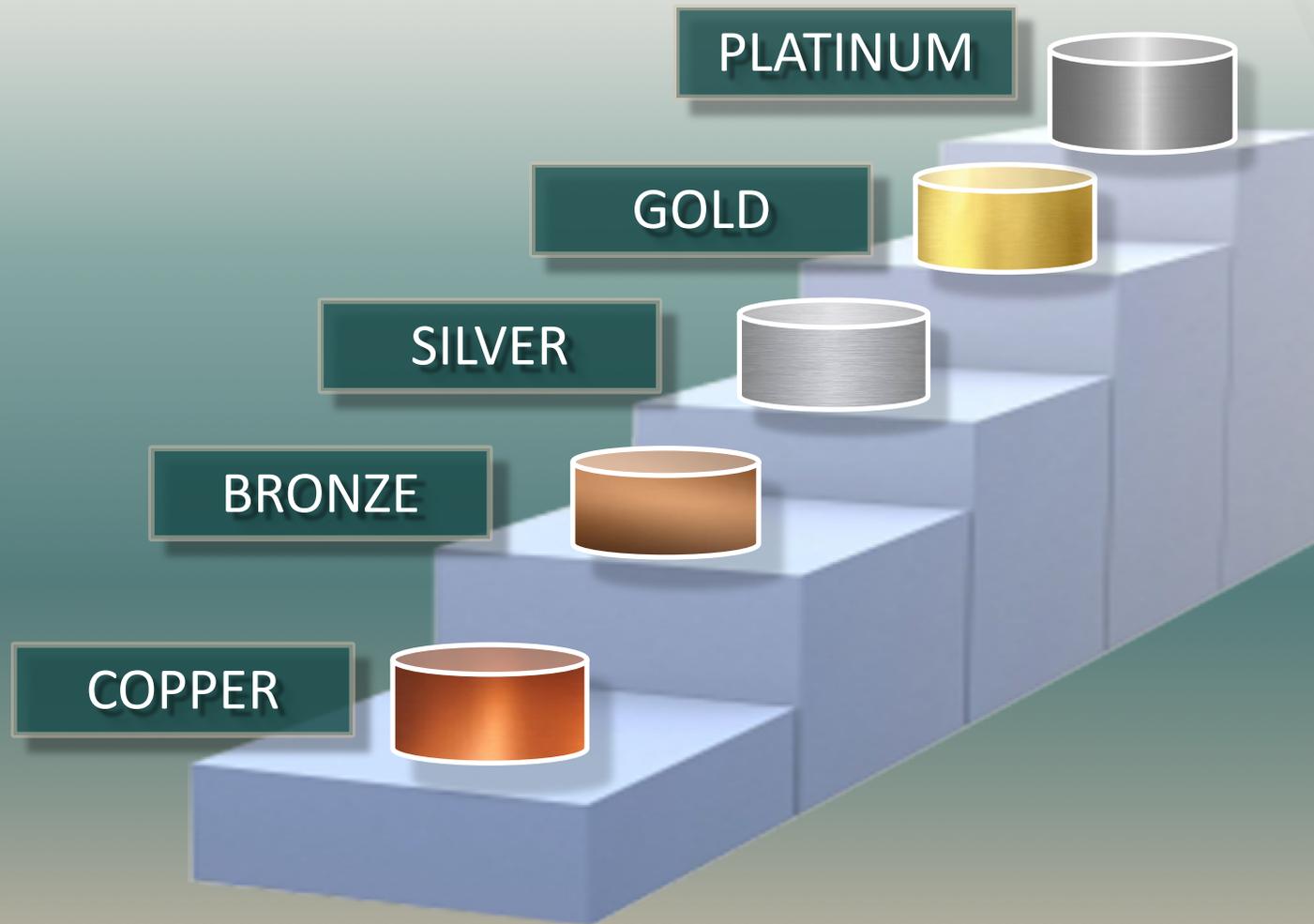
Environmental

Stewardship

Program



Levels of Recognition



Levels of Recognition



For partnerships,
collaborations or
regulated facilities
that have completed a
project that resulted
in measurable
improvements to the
environment

Levels of Recognition



For regulated facilities making a demonstrated effort to comply with environmental regulations

Levels of Recognition



For organizations
improving their
environmental
footprint by
preventing pollution
and conserving natural
resources

Levels of Recognition



For organizations willing to develop and maintain an Environmental Management System (EMS) that is consistent with the ISO 14001 standard

Levels of Recognition



For organizations with
a fully implemented
Environmental
Management
System
(EMS)

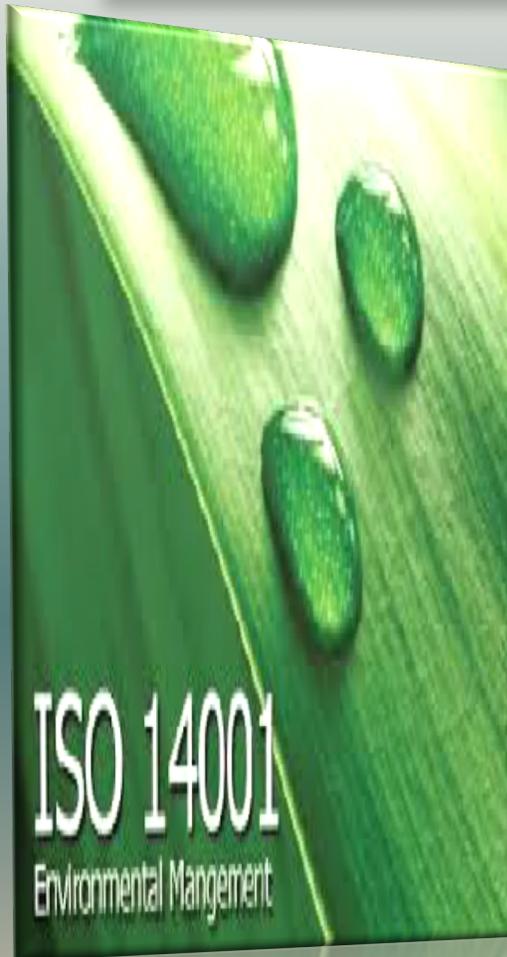


Potential Benefits and Incentives



- Inspection pre-notification
- Reduced Inspection Frequency
- Enforcement Notice
- Reporting Consolidation
- Recognition
- Permit Flexibility

Environmental Management System (EMS)



- Policy
- Planning
- Implementation and Operation
- Checking and Corrective Action
- Management Review

Program Logistics



➤ Electronic Application Process



➤ Membership good for three years



➤ Copper-One time, one year recognition



➤ Annual Report documenting progress on commitment(s) due each year on April 1st



➤ Renewals good for three years



➤ Demotions and Revocations possible

Voluntary Environmental Stewardship Program

Arizona Voluntary Environmental Stewardship Program Application

ADEQ

Type of Submittal: Initial Application Update Application First Annual Report Second Annual Report Third Annual Report

Type of Membership: (Please select from either the Regulated or Non-Regulated Facility dropdown list)

Regulated Facility: (Facility subject to environmental requirements)

Non-Regulated Facility or Collaboration: (Organization not subject to environmental requirements)

Name of organization: _____

City: _____ State: _____ Location/street address: _____ Zip Code: _____

Is there a parent company?

Parent Company name: _____

City: _____ State: _____ Location/street address: _____ Zip Code: _____

Facility Contact Name: _____

Contact Title: _____ Contact fax: _____

Contact Phone: _____ Contact Email: _____

Company web address: _____

Is mailing address the same as facility address?

Mailing address: _____

City: _____ State: _____ Zip Code: _____

Number of Full time equivalents? _____ Primary NAICS Industry Title: _____ Secondary NAICS Industry Title: _____

How did you learn about the Arizona Voluntary Environmental Stewardship Program? (Select all that apply)

Press Release Social Network Outlet At a professional conference, meeting, event ADEQ Employee Through an Environmental Consultant Media ADEQ Webpage An environmental event An existing member I'm a peer in your sector Other (Specify below: _____)

If Other, identify source: _____

Facility Specific Information

Total square footage of facility: _____ Total acreage of facility: _____

What activities, products, or services does your facility or collaboration engage in, make, or provide? (Please feel free to send as an attachment):

Identify any applicable environmental permits, from the dropdown list, that apply to the buildings and locations included in this application and provide the associated permit or identification number:

Permitting Agency	Type of Permit	Permit Number	Permitting Agency	Type of Permit	Permit Number

Has your facility been inspected by an environmental regulatory agency within the past three years?

Who was/were the regulatory agency(ies)? _____

Were you cited for violations?

Have all violations been addressed?

If outstanding violations exist, describe the steps being taken to resolve them (attach explanation if necessary):

Apply on ADEQ website

Voluntary Environmental Stewardship Program (VESP)

Program Logistics

The image shows a screenshot of the 'Arizona Voluntary Environmental Stewardship Program Application' form. The form is titled 'Arizona Voluntary Environmental Stewardship Program Application' and features the ADEQ logo. It includes sections for 'Type of Membership', 'Regulated Facility', 'Non-Regulated Facility or Collaboration', 'Facility Contact Information', and 'Facility Specific Information'. The 'Facility Specific Information' section contains a table for listing applicable environmental permits.

Permitting Agency	Type of Permit	Permit Number	Permitting Agency	Type of Permit	Permit Number

VESP
IS
NOT
A
LICENSE

Contact Information

Len Drago, Ombudsman & Tribal Liaison

Arizona Department of Environmental Quality

1110 West Washington Street

Phoenix, AZ. 85007

602.771.4322

drago.leonard@azdeq.gov

www.azdeq.gov

VESP Webpage:

www.azdeq.gov/other/VESP

myCommunity

<http://azdeq.gov/MyCommunity>





Jean Ziga
Air Quality Compliance Officer





1110 W. Washington St.
Phoenix, AZ 85007

 printed on recycled paper

Jean H. Ziga
Compliance Officer
ziga.jean@azdeq.gov

office: (602) 771-3090
fax: (602) 771-2299
toll free: 1-800-234-5677

www.azdeq.gov



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Phoenix, AZ 85007

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Katie Ebertz
Air Quality Compliance Officer
ebertz.katie@azdeq.gov

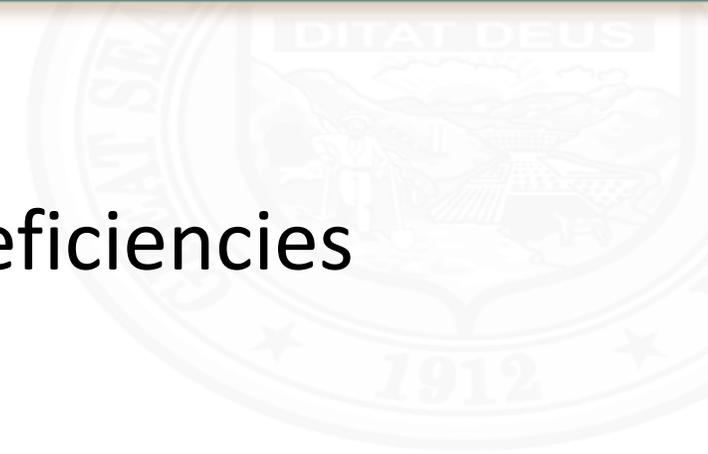
office: (602) 771-2324
toll free: 1-800-234-5677
fax: (602) 771-2299

www.azdeq.gov

- Compliance / Enforcement
NEI / NCI / NPP
- Goal: Return to Compliance as quickly as possible.



- Informal
 - NOC: Notice of Opportunity to Correct Deficiencies
 - **Field- Issued**
 - Office Issued
 - NOV: Notice of Violation
 - Reserve right to seek civil penalty
- Administrative
 - Consent Order or Abatement Order
- Formal
 - Civil (Consent Judgement) or Criminal



1. Equipment not marked
2. No Annual emissions certification
3. No Method 9 person
4. No Method 9 observations
5. No records of dust control activities
6. No throughput records / operating hours
7. No monitoring devices used to determine daily PWR of sand, gravel or crushed stone
8. Opacity Exceedance
9. Engine requirements not followed
10. Insufficient wetting
11. Failure to take reasonable dust precautions
12. Opacity > 40% for Non-Point Source
13. No pollution control maintenance log
14. Uncontrolled Spray painting
15. No black light testing
16. No Non-road engine log

Submit documentation that the alleged deficiencies have been corrected: photographs, receipts, standard operating procedures, etc. Certification of Truth, Accuracy and Completeness should be included.

“Once ADEQ has received the requested documentation, the case will be closed and a letter will be issued stating that the agency will take no further action as a result of this inspection.”



Permit Overview

Permits by Business Type

Listing of All Permits & Registrations

Compliance Assistance

Small Communities Compliance Assistance

Compliance

Revised on: February 2023

Arizona's Aquifer

- APP for Mining

Drinking Water

- Public Water Systems | [Learn More >](#)

Small Communities

[Learn More >](#)

Additional compliance assistance for other permits will be coming soon!

ADEQ's Compliance Enforcement Handbook for your reference | [View Handbook >](#)

View/Download forms listed in the ADEQ's Compliance Enforcement Handbook | [View Forms >](#)



CONTACT US

ADEQ Main Office
1110 W. Washington Street
Phoenix, AZ 85007

602-771-2300 - General Information
800-234-5677 - Toll-Free
711 - Teleprinter Services

[Directions to ADEQ >](#)
[Parking at ADEQ >](#)

[Community Liaisons >](#)
[Ombudsman Citizen's-Aide >](#)
[ADEQ Contact List >](#)

Southern Regional Office (SRO)
400 W. Congress Street
Suite 433

Rob Verville verville.rob@azdeq.gov

Casey Bryan Bryan.Casey@azdeq.gov

Shawn McFatter mcfatter.shawn@azdeq.gov

Adam Bankhead Bankhead.adam@azdeq.gov

Compliance Officers

Jean Ziga

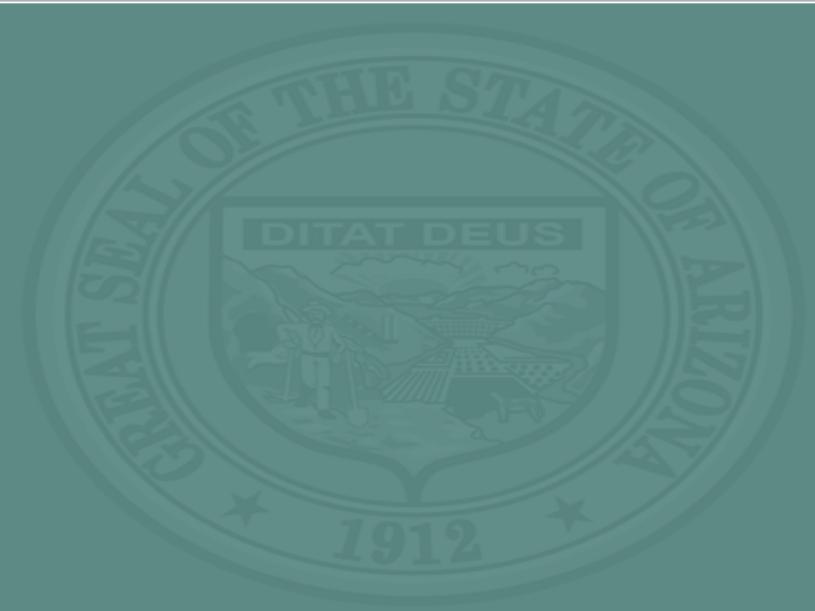
Katie Ebertz

Facilities Emissions Control Section:

Contact (602) 771-2338

AQ Compliance Unit Manager: kim.david@azdeq.gov

AQ Permits Unit Acting Manger: valerie.thorsen@azdeq.gov



Thank you for attending the ADEQ Air Quality Workshop

Arizona Department of Environmental Quality

1110 West Washington Street

Phoenix, AZ. 85007

www.azdeq.gov

