

**Notification Packet
For
Facility Changes Allowed Without Permit Revisions
To a Class II Permit**



Arizona Department of Environmental Quality

Air Quality Division

1110 West Washington • Phoenix, AZ 85007 • Phone: 602-771-4365

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SECTION 1.0 – GENERAL INFORMATION

1.1 OPPORTUNITIES TO CONSULT

The Department is available for consultation meetings. All requests should be made by contacting the Department at airpermits@azdeq.gov or David Kim 602-771-4365.

1.2 WHEN TO SUBMIT THE 317 CHANGE NOTIFICATION

See Section **Error! Reference source not found.**

1.3 ADEQ TIMEFRAME FOR CLASS II 317 CHANGE

ADEQ usually responds to the notification within 4 calendar days either concurring that the proposed change qualified for a 317 change or whether a permit revision is required.

1.4 FEE FOR CLASS II 317 CHANGE

There is no processing fee for a Class II 317 change.

1.5 ADVERSE DETERMINATION BY ADEQ

We require that all notifications submitted for processing are complete and ready for technical review upon receipt. Complete and accurate information is required in order to keep processing timelines reasonable.

When preparing a notification, please be aware that ADEQ may make an adverse determination (i.e. that the change does not qualify under rule 317) based on the contents of the notification without requesting supplemental information. Adverse decisions may result from the following:

- Notification is incomplete.
- The contact information on the notification is incorrect, or the contact cannot be reached to answer questions about the project.

If you receive an adverse determination from ADEQ:

- You will be informed specifically why the determination was made.
- You will have the right to re-apply with additional information.
- You will be able to consult with ADEQ on what information is required before re-submitting.
- You will have the right to appeal.

If you are unsure if you may receive an adverse determination, we suggest a pre-notification consultation meeting (see Section 1.1 above)

SECTION 2.0 – DOES THE CHANGE PROPOSED QUALIFY FOR A 317 CHANGE OR NEED A 317 CHANGE?

2.1 Changes allowed using the 317 Change Notification Form

The following changes may be made with a 317 change notification, provided that: (1) the permittee provides the appropriate amount of notice before the change, (2) the change does not require a permit revision (see the next section).

Change	Required Notice
Replacing an item of air pollution control equipment listed in the permit with one that is not identical but that is substantially similar and has the same or better pollutant removal efficiency	7 days
A physical change or change in the method of operation that increases actual emissions more than 10% of the major source threshold for any conventional pollutant but does not require a permit revision	7 days
Replacing an item of air pollution control equipment listed in the permit with one that is not substantially similar but that has the same or better efficiency	30 days
A change that would trigger an applicable requirement that already exists in the permit	30 days (unless otherwise required by the applicable requirement)
A change that amounts to reconstruction of the source or an affected facility. (Reconstruction is assumed if the fixed capital cost of the new components exceeds 50% of a comparable new source or affected facility and the changes have occurred over 12 consecutive months)	7 days
A change that will result in the emissions of: (1) a new regulated air pollutant above an applicable regulatory threshold; or (2) a conventional air pollutant above 10% of the major source threshold for that pollutant; but that does not trigger a new applicable requirement for that source category.	30 days
Change described above made in response to an emergency	As soon as practicable

2.2 Changes which require a permit revision

Even if the change is described in section 2.1, the permittee must submit a permit revision (not a 317 change notification) for the following types of changes:

- 2.2.1 A change that would trigger a new applicable requirement or violate an existing applicable requirement;
- 2.2.2 Establishment of, or change in, an emissions cap under A.A.C. R18-2-306.02;
- 2.2.3 A change that will require a case-by-case determination of an emission limitation or other standard, or a source specific determination of ambient impacts, or a visibility or increment analysis;
- 2.2.4 A change that results in emissions that are subject to monitoring, recordkeeping or reporting under A.A.C. R18-2-306(A)(3), (4), or (5) if the emissions cannot be measured or otherwise adequately quantified by monitoring, recordkeeping, or reporting requirements already in the permit;
- 2.2.5 A change that will authorize the burning of used oil, used oil fuel, hazardous waste, or hazardous waste fuel, or any other fuel not currently authorized by the permit;
- 2.2.6 A change that requires the source to obtain a Class I permit;
- 2.2.7 Replacement of an item of air pollution control equipment listed in the permit with one that does not have the same or better pollutant removal efficiency;
- 2.2.8 Establishment or revision of a limit under A.A.C. R18-2-306.01;
- 2.2.9 Increasing operating hours or rates of production above the permitted level;
- 2.2.10 A change that relaxes monitoring, recordkeeping, or reporting requirements, except when the change results:
 - a. From removing equipment that results in a permanent decrease in actual emissions, if the source keeps onsite records of the change in a log that satisfies Appendix 3 of A.A.C. R18-2 and if the requirements that are relaxed are present in the permit solely for the equipment that was removed; or
 - b. From a change in an applicable requirement; and
- 2.2.11 A minor NSR modification.

Notifiers are suggested to refer to Minor NSR Review Guidance Document available at: <http://www.azdeq.gov/environ/air/permits/permitapplications.html>.
- 2.2.12 Any change, when considered together with other changes made during the permit term, constitute a change described in this section.

SECTION 3.0 – CLASS II PERMIT APPLICATION PACKAGE

3.1 STANDARD CLASS II PERMIT APPLICATION FORM
ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY
Air Quality Division
1110 West Washington • Phoenix, AZ 85007 • Phone: (602) 771-4365

1. Permit to be issued to (Business license name of organization that is to receive permit):

2. Mailing Address: _____
City: _____ State: _____ ZIP: _____
3. Name (or names) of Responsible Official: _____
Phone: _____ Fax: _____ Email: _____
4. Facility Manager/Contact Person and Title: _____
Phone: _____ Fax: _____ Email: _____
5. Facility Name: _____
Facility Location/Address: _____
City: _____ County: _____ Zip Code: _____
Indian Reservation (if applicable, which one): _____
Latitude/ Longitude, Elevation: _____
Section/ Township/ Range: _____
6. General Nature of Business: _____
7. Type of Organization:
 Corporation Individual Owner Partnership Government Entity LLC
 Other _____
8. Existing permit number (and exp. date): _____
Date of Commencement of the Change: _____
Primary Standard Industrial Classification Code: _____
9. I certify that I have knowledge of the facts herein set forth, that the same are true, accurate and complete to the best of my knowledge and belief, and that all information not identified by me as confidential in nature shall be treated by ADEQ as public record. I also attest that I am in compliance with the applicable requirements of the Permit and will continue to comply with such requirements and any future requirements that become effective during the life of the Permit. I will present a certification of compliance to ADEQ no less than annually and more frequently if specified by ADEQ. I further state that I will assume responsibility for the construction, modification, or operation of the source in accordance with Arizona Administrative Code, Title 18, Chapter 2 and any permit issued thereof.
- Signature of Responsible Official: _____
Official Title of Signer: _____
Typed or Printed Name of Signer: _____
Date: _____ Telephone Number: _____

Instructions for Standard Class II Permit Application Form

ADEQ requires all applicants to submit a completed Standard Permit Application Form.

Items #1 through **#5** of the application form are self-explanatory. The rest are explained below in detail.

Item #6: General Nature of Business - This should be in terms of what is produced at the facility.

Item #7: Type of Organization. If the "other" box is checked, specify what the organization is.

Item #8: The Date of Commencement of the Change is the expected date that the change will begin. The Standard Industrial Classification Code is a number which describes the type of facility.

Item #9: Signature and Printed Name of **Responsible Official**. If unsure who the responsible official is for your company, refer to the definition in Section 4, Definitions.

REGULATED AIR POLLUTANT NAME ^[3]	TOTAL EMISSION CHANGES (LB/HR. ^[4])	TOTAL EMISSION CHANGES (TPY ^[5])

General Instructions:

1. **Only the emissions related to the unit(s) affected by the proposed change(s) need to be listed above. Emission calculations in Excel Spreadsheets also should be submitted by email along with this notification to expedite the review process.**
2. Identify each emission point with a unique number for this plant site, consistent with emission point identification used on plot plan, previous permits, and Emissions Inventory Questionnaire. Include fugitive emissions. Limit emission point number to eight (8) character spaces. For each emission point use as many lines as necessary to list regulated air pollutant data. Typical emission point names are: heater, vent, boiler, tank, reactor, separator, baghouse, fugitive, etc. Abbreviations are O.K.
3. Components to be listed include regulated air pollutants as defined in A.A.C. R18-2-101. Examples of typical component names are: Carbon Monoxide (CO), Nitrogen Oxides (NO_x), Sulfur Dioxide (SO₂), Volatile Organic Compounds (VOC), particulate matter (PM), particulate no larger than 10 microns (PM₁₀), etc. Abbreviations are O.K.
4. Pounds per hour (LB/HR) is maximum potential emission rate expected by applicant.
5. Tons per year (TPY) is annual maximum potential emission expected by applicant, which takes into account process operating schedule.

3.3 EQUIPMENT LIST UPDATES

The following table should include the equipment list updates at the facility resulted from the proposed change(s), and should be completed with all the requested information. Be sure to notate the units (tons/hour, horsepower, etc.) when recording the Maximum Rated Capacity information, the Serial Number and/or the Equipment ID Number. The date of manufacture must be included in order to determine if portions of the facility are NSPS applicable. Make additional copies of this form if necessary.

Type of Equipment	Maximum Rated Capacity	Make	Model	Serial Number	Date of Manufacture	Equipment ID Number
Removed Equipment						
Added Equipment						
Updated Equipment						

3.4 NOTIFICATION FORM FILING INSTRUCTIONS

No notification shall be considered properly filed until the Director has determined that all information required by this notification form has been submitted. The Director may waive certain notification requirements for specific source types. The notifier need only supply the information directly related to the proposed change(s). In addition to the information required on this notification form, the notifier shall supply the following if related to the proposed change(s):

1. Provide the following information. The information should demonstrate why the proposed change(s) qualifies (qualify) for a 317 change or needs (need) a 317 change according to Section 2.1. If the proposed change(s) does (do) not qualify for a 317 change, submit a minor or significant permit revision instead.
 - a. When the proposed change will occur,
 - b. A description of the change,
 - c. Any change in emissions of regulated air pollutants, and
 - d. Any permit term or condition that is no longer applicable as a result of the change.
2. Provide a description of all process and control equipment that are involved in the proposed change(s) including:
 - a. Name.
 - b. Make (if available).
 - c. Model (if available).
 - d. Serial number (if available).
 - e. Date of manufacture (if available).
 - f. Size/production capacity.
 - g. Type.
3. Submit the manufacturer's spec sheet(s) for the equipment that are involved in the proposed change(s).
4. Calculations on which all information requested in this notification is based.

SUBMITTING A COMPLETE NOTIFICATION

These directions are to be used in conjunction with the Standard Permit Application and Filing Instructions contained in Section 3.4 of this package.

The standard application form and filing instructions are designed to assist the notifier in providing the information which will allow the Arizona Department of Environmental Quality (ADEQ) to determine the applicability of 317 change, the applicable regulations, and determine if the standards will be met.

Standard Permit Application Form (Page 6 of the Notification Packet)

Emissions

Notifiers must submit the potential emissions of the affected emission units. Emission estimates allow ADEQ to determine the applicability of 317 change, the applicable requirements, and whether or not the standards can be met.

Emission Sources Form

The Emissions Sources Form is to be used to submit the emission changes in a concise manner. The emission point name and number should correspond to the site diagram. The potential emissions must be reported in terms of pounds per hour and tons per year.

Calculating Emissions

Emission changes should be calculated using commonly accepted calculation methodologies, such as:

- EPA's Compilation of Air Pollutant Emission Factors (AP-42)
 - most commonly used and always accepted
 - generally does not include HAPs emissions
 - generally does not speciate VOCs
- Emission tests from a similar plant or the actual plant
- Other published studies provided conditions are similar (will be used most often to estimate HAPs)
- Engineering calculations such as a material balance
- Include all information and references used to estimate emissions (ADEQ prefers copies of the references used)

Information Used to Estimate Emissions

- Maximum annual and hourly process rates for each piece of equipment
- The net emission changes from the proposed change(s)
- Type and composition of fuels used (e.g. sulfur content)
- Annual and hourly quantity of fuel used
- Heating value of fuel
- Annual and hourly quantity of raw materials used
- Operating schedule
 - Hours per day
 - Days Per year
 - Percent of annual production by season
- Material balance (if used)
- All calculations

SECTION 4.0 – NOTIFICATION ADMINISTRATIVE COMPLETENESS CHECKLIST

	REQUIREMENT	MEETS REQUIREMENTS			COMMENT
		YES	NO	N/A	
1	Has the standard notification form been completed?				
2	Has the responsible official signed the standard application form?				
3	Has the applicant demonstrated why the proposed change(s) qualifies (qualify) for a 317 change or needs (need) a 317 change?				
4	Has a description of the proposed change and when it will occur been provided?				
5	Are the facility's emission changes documented with all appropriate supporting information?				
6	Has the emission calculations in Excel Spreadsheet been submitted by email?				
7	If applicable, has the applicant included any permit term or condition that is no longer applicable as a result of the change?				
8	Has the applicant provided a description of all process and control equipment that are involved in the proposed change(s), with the type, name, make, model, serial number, maximum rated capacity, and date of manufacture?				
9	Has the applicant submitted the manufacturer's spec sheet(s) for the equipment that are involved in the proposed change(s)?				