

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



**Arizona Department of Environmental Quality**

**Air Quality Division**

**1110 West Washington • Phoenix, AZ 85007 • Phone: (602) 771-2338**

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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@azdeg.gov](mailto:airpermits@azdeg.gov) or Mabel Hutchison at (602) 771-2338.

### **1.2 WHEN TO SUBMIT THE FACILITY CHANGE WITHOUT PERMIT REVISIONS (317 CHANGE\*) NOTIFICATION**

Submit the notification in a timely manner so that the Director and the Administrator would receive it within a minimum of seven working days in advance of the change. If the notification is associated with emergency conditions, such as malfunctions necessitating the replacement of equipment, it may be provided less than seven working days in advance of the change but must be provided as far in advance of the change or, if advance notification is not practicable, as soon after the change as possible.

\* Facility change without permit revisions is made under A.A.C. R18-2-317 for Class I permit, so it is also referred to as 317 change.

### **1.3 ADEQ TIMEFRAME FOR CLASS I 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 I 317 CHANGE**

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

### **1.5 ADVERSE DETERMINATION BY ADEQ**

ADEQ requires 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?**

### **2.1 A facility with a Class I permit may make changes that contravene an express permit term without a permit revision if all of the following apply:**

- 2.1.1 The changes are not modifications under any provision of Title I of the Act or under A.R.S. § 49-401.01(24);
- 2.1.2 The changes do not exceed the emissions allowable under the permit whether expressed therein as a rate of emissions the permit whether expressed therein as a rate of emissions or in terms of total emissions;
- 2.1.3 The changes do not violate any applicable requirements or trigger any additional applicable requirements;
- 2.1.4 The changes satisfy all requirements for a minor permit revision under R18-2-319(A);
- 2.1.5 The changes do not contravene federally enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements; and
- 2.1.6 The changes do not constitute a minor NSR modification.

Notifiers are suggested to refer to Minor NSR Review Guidance Document available at:

<http://www.azdeq.gov/enviro/air/permits/permitapplications.html>.

- 2.1.7 The substitution of an item of process or pollution control equipment for an identical or substantially similar item of process or pollution control equipment shall qualify as a change that does not require a permit revision, if the substitution meets all of the requirements of A.A.C. R18-2-317.A, D, and E.

### **2.2 If emission trading within the facility is allowed by the permit under R18-2-306(A)(12), then such emission trading may be performed with this notification form.**

## **SECTION 3.0 – CLASS I PERMIT APPLICATION PACKAGE**

**3.1 STANDARD CLASS I APPLICATION FORM**  
**ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY**  
**Air Quality Division**  
**1110 West Washington • Phoenix, AZ 85007 • Phone: (602) 771-2338**

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 Owners/ Principals: \_\_\_\_\_  
Phone: \_\_\_\_\_ Fax: \_\_\_\_\_ Email: \_\_\_\_\_
4. Name of Owner's Agent: \_\_\_\_\_  
Phone: \_\_\_\_\_ Fax: \_\_\_\_\_ Email: \_\_\_\_\_
5. Plant/Site Manager/ Contact Person and Title: \_\_\_\_\_  
Phone: \_\_\_\_\_ Fax: \_\_\_\_\_ Email: \_\_\_\_\_
6. Plant Site Name: \_\_\_\_\_
7. Plant Site Location Address: \_\_\_\_\_  
City: \_\_\_\_\_ County: \_\_\_\_\_ Zip Code: \_\_\_\_\_  
Indian Reservation (if applicable, which one): \_\_\_\_\_  
Latitude/ Longitude, Elevation: \_\_\_\_\_  
Section/ Township/ Range: \_\_\_\_\_
8. General Nature of Business: \_\_\_\_\_
9. Type of Organization:  
☐ Corporation    ☐ Individual Owner    ☐ Partnership    ☐ Government Entity (Government Facility Code )  
☐ Other \_\_\_\_\_
10. Existing permit number (and exp. date): \_\_\_\_\_  
Date of Commencement of the Change: \_\_\_\_\_  
Primary Standard Industrial Classification Code: \_\_\_\_\_
11. 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 I 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:** asks for the Plant/Site Manager or Contact Person. This should be the person who is responsible for implementing the permit at the facility and the person ADEQ may contact for additional information.

**Item #7:** requests the current or proposed location of the facility.

**Item #8:** asks for the general nature of business. This should be in terms of what is produced at the plant.

**Item #9:** if the "other" box is checked, please be specific as to what the organization is.

**Item #10:** 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 #11:** The "Responsible Official" is the owner or a partner of the company in most cases. Please see the definition of "Responsible Official" in Section SECTION 3.0 – CLASS I

PERMIT APPLICATION PACKAGE of this package.



## 3.2

PAGE        OF       

DATE \_\_\_\_\_

Estimated "Potential to Emit" per A.A.C. R18-2-101.

Review of notification and issuance of permits will be expedited by supplying all necessary information on this Table.

[illegible]

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

**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<sub>x</sub>), Sulfur Dioxide (SO<sub>2</sub>), Volatile Organic Compounds (VOC), particulate matter (PM), particulate no larger than 10 microns (PM<sub>10</sub>), 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
<b>Removed Equipment</b>						
<b>Added Equipment</b>						
<b>Updated Equipment</b>						

### **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 requirements. 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 according to Section SECTION 2.0 – DOES THE CHANGE PROPOSED QUALIFY FOR A 317 CHANGE?. 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;
  - d. The pollutants emitted subject to the emissions trade, if any;
  - e. The provisions in the implementation plan that provide for the emissions trade with which the source will comply and any other information as may be required by the provisions in the implementation plan authorizing the trade;
  - f. If the emissions trading provisions of the implementation plan are invoked, then the permit requirements with which the source will comply; and
  - g. 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 NOTIFICATION FORM FILING INSTRUCTIONS 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 to emit of the affected emission units. Emission estimates allow ADEQ to determine the applicability of 317 change, the notification 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

Some commonly seen methodologies that were approved by ADEQ in the past:

- 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 application 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?				
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 electronic format been submitted by email?				
7	If applicable, has the applicant submitted all the information as may be required by the provisions in the implementation plan authorizing the emissions trade?				
8	If applicable, has the applicant included any permit term or condition that is no longer applicable as a result of the change?				
9	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?				
10	Has the applicant submitted the manufacturer's spec sheet(s) for the equipment that are involved in the proposed change(s)?				