

CLASS II AIR QUALITY PERMIT

DRAFT PERMIT No. 89020

PERMITTEE: Boral Materials LLC
FACILITY: Boral Kirkland Mine
PLACE ID: 207247
DATE ISSUED: DRAFT
EXPIRY DATE: DRAFT

SUMMARY

This Class II air quality permit is issued to Boral Materials LLC, the Permittee, for the construction and operation of the Boral Kirkland Mine. The facility is located at 7855 Iron Springs Rd, Skull Valley, AZ 86338.

Although the facility's controlled potential to emit (PTE) is below the significant level, a Class II permit has been required by the Director in accordance with Arizona Administrative Code (A.A.C.) R18-2-302.01.D. The facility's PTE is greater than the permitting exemption thresholds for particulate matter less than 10 microns (PM₁₀), particulate matter less than 2.5 microns (PM_{2.5}), and nitrogen oxides (NO_x); and consequently, triggers the requirements of A.A.C. R18-334 for Minor New Source Review (NSR) for these pollutants. The facility has met the requirements of Minor NSR by electing to implement reasonably available control technology (RACT) for each emission unit. Additionally, an ambient air impact assessment was conducted through a refined air dispersion modeling analysis to demonstrate compliance with the National Ambient Air Quality Standards (NAAQS) for particulate matter and nitrogen oxides.

This permit is issued in accordance with Arizona Revised Statutes (ARS) 49-426. It contains requirements from Title 18, Chapter 2 of the A.A.C. and Title 40 of the Code of Federal Regulations. All definitions, terms, and conditions used in this permit conform to those in the Arizona Administrative Code R18-2-101 et. seq. (A.A.C.) and Title 40 of the Code of Federal Regulations (CFR), except as otherwise defined in this permit.

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ATTACHMENT "A": GENERAL PROVISIONS

I. PERMIT EXPIRATION AND RENEWAL

- A.** This permit is valid for a period of five (5) years from the date of issuance.
[ARS § 49-426.F, A.A.C. R18-2-306.A.1]
- B.** The Permittee shall submit an application for renewal of this permit at least six (6) months, but not more than eighteen (18) months, prior to the date of permit expiration.
[A.A.C. R18-2-304.D.2]

II. COMPLIANCE WITH PERMIT CONDITIONS

- A.** The Permittee shall comply with all conditions of this permit including all applicable requirements of the Arizona Revised Statutes (A.R.S.) Title 49, Chapter 3, and the air quality rules under Title 18, Chapter 2 of the Arizona Administrative Code. Any permit noncompliance is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application. In addition, noncompliance with any federally enforceable requirement constitutes a violation of the Clean Air Act.
[A.A.C. R18-2-306.A.8.a]
- B.** 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.
[A.A.C. R18-2-306.A.8.b]

III. PERMIT REVISION, REOPENING, REVOCATION AND REISSUANCE, OR TERMINATION FOR CAUSE

- A.** The permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a permit revision, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[A.A.C. R18-2-306.A.8.c]
- B.** The permit shall be reopened and revised under any of the following circumstances:
- 1.** The Director or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; and
[A.A.C. R18-2-321.A.1.c]
 - 2.** The Director or the Administrator determines that the permit needs to be revised or revoked to assure compliance with the applicable requirements.
[A.A.C. R18-2-321.A.1.d]
- C.** Proceedings to reopen and issue a permit, including appeal of any final action relating to a permit reopening, shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening

shall be made as expeditiously as practicable. Permit reopenings shall not result in a resetting of the five-year permit term.

[A.A.C. R18-2-321.A.2]

IV. POSTING OF PERMIT

A. The Permittee shall post this permit or a certificate of permit issuance on location where the equipment is installed in such a manner as to be clearly visible and accessible. All equipment covered by this permit shall be clearly marked with one of the following:

[A.A.C. R18-2-315.A]

1. Current permit number; or
2. Serial number or other equipment ID number that is also listed in the permit to identify that piece of equipment.

B. A copy of the complete permit shall be kept on site.

[A.A.C. R18-2-315.B]

V. FEE PAYMENT

The Permittee shall pay fees to the Director pursuant to ARS § 49-426(E) and A.A.C. R18-2-326.

[A.A.C. R18-2-306.A.9 and -326]

VI. ANNUAL EMISSION INVENTORY QUESTIONNAIRE

A. The Permittee shall complete and submit to the Director an emissions inventory questionnaire no later than June 1 every three years beginning June 1, 2021. At the Director's request, the Permittee may be required to complete and submit emissions inventory questionnaires in addition to the triennial emissions inventory questionnaire. The Director shall notify the Permittee in writing of the decision to require additional emissions inventory questionnaires.

[A.A.C. R18-2-327.A.1.b]

B. The emissions inventory questionnaire shall be on an electronic or paper form provided by the Director and shall include the information required by A.A.C. R18-2-327.A.3 for the previous calendar year.

[A.A.C. R18-2-327.A.3]

VII. COMPLIANCE CERTIFICATION

A. The Permittee shall submit a compliance certification to the Director semiannually which describes the compliance status of the source with respect to each permit condition. The certification shall be submitted no later than May 15 and November 15. The May 15 compliance certification shall report the compliance status of the source during the period between October 1 of the previous year and March 31 of the current year. The November 15 compliance certification shall report the compliance status of the source during the period between April 1 and September 30 of the current year.

[A.A.C. R18-2-309.2.a]

B. The compliance certifications shall include the following:

1. Identification of each term or condition of the permit that is the basis of the certification;
[A.A.C. R18-2-309.2.c.i]
 2. Identification of the methods or other means used by the Permittee for determining the compliance status with each term and condition during the certification period;
[A.A.C. R18-2-309.2.c.ii]
 3. Status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certifications shall identify each deviation (including any deviations reported pursuant to Condition XII.B of this Attachment) during the period covered by the certification and take it into account for consideration in the compliance certification
[A.A.C. R18-2-309.2.c.iii]
 4. For emission units subject to 40 CFR Part 64, the certification shall also identify as possible exceptions to compliance any period during which compliance is required and in which an excursion or exceedance defined under 40 CFR Part 64 occurred;
[A.A.C. R18-2-309.2.c.iii]
 5. Other facts the Director may require in determining the compliance status of the source.
[A.A.C. R18-2-309.2.c.iv]
- C. A progress report on all outstanding compliance schedules shall be submitted every six months beginning six months after permit issuance.
[A.A.C. R18-2-309.5.d]

VIII. CERTIFICATION OF TRUTH, ACCURACY AND COMPLETENESS

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

[A.A.C. R18-2-309.3]

IX. INSPECTION AND ENTRY

Upon presentation of proper credentials, the Permittee shall allow the Director or the authorized representative of the Director to:

- A. Enter upon the Permittee's premises where a source is located, emissions-related activity is conducted, or where records are required to be kept under the conditions of the permit;
[A.A.C. R18-2-309.4.a]
- B. Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;

[A.A.C. R18-2-309.4.b]

- C. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
[A.A.C. R18-2-309.4.c]
- D. Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements; and
[A.A.C. R18-2-309.4.d]
- E. Record any inspection by use of written, electronic, magnetic and photographic media.
[A.A.C. R18-2-309.4.e]

X. PERMIT REVISION PURSUANT TO FEDERAL HAZARDOUS AIR POLLUTANT STANDARD

If this source becomes subject to a standard promulgated by the Administrator pursuant to Section 112(d) of the Act, then the Permittee shall, within twelve months of the date on which the standard is promulgated, submit an application for a permit revision demonstrating how the source will comply with the standard.

[A.A.C. R18-2-304.D.3]

XI. ACCIDENTAL RELEASE PROGRAM

If this source becomes subject to the provisions of 40 CFR Part 68, then the Permittee shall comply with these provisions according to the timeline specified in 40 CFR Part 68.

[40 CFR Part 68]

XII. EXCESS EMISSIONS, PERMIT DEVIATIONS, AND EMERGENCY REPORTING

A. Excess Emissions Reporting

[A.A.C. R18-2-310.01.A, B, and C]

1. Excess emissions shall be reported as follows:

- a. The Permittee shall report to the Director any emissions in excess of the limits established by this permit. Such report shall be in two parts as specified below:

[A.A.C. R18-2-310.01.A]

- (1) Notification by telephone or facsimile within 24 hours of the time when the Permittee first learned of the occurrence of excess emissions including all available information from Condition XII.A.1.b below.
- (2) Detailed written notification by submission of an excess emissions report within 72 hours of the notification pursuant to Condition XII.A.1.a(1) above.

- b. The report shall contain the following information:

- (1) Identity of each stack or other emission point where the excess emissions occurred;
[A.A.C. R18-2-310.01.B.1]
- (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;
[A.A.C. R18-2-310.01.B.2]
- (3) Time and duration, or expected duration, of the excess emissions;
[A.A.C. R18-2-310.01.B.3]
- (4) Identity of the equipment from which the excess emissions emanated;
[A.A.C. R18-2-310.01.B.4]
- (5) Nature and cause of the emissions;
[A.A.C. R18-2-310.01.B.5]
- (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;
[A.A.C. R18-2-310.01.B.6]
- (7) Steps that were or are being taken to limit the excess emissions; and
[A.A.C. R18-2-310.01.B.7]
- (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 governing source operation during periods of startup or malfunction..
[A.A.C. R18-2-310.01.B.8]

2. In the case of continuous or recurring excess emissions, the notification requirements shall be satisfied if the source provides the required notification after excess emissions are first detected and includes in such 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 notification pursuant to Condition XII.A.1 above.
[A.A.C. R18-2-310.01.C]

B. Permit Deviations Reporting

The Permittee shall promptly report deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the applicable requirement contains a definition of prompt or otherwise specifies a timeframe for reporting deviations, that definition or timeframe shall govern. Where the applicable

requirement does not address the timeframe for reporting deviations, the Permittee shall submit reports of deviations according to the following schedule:

1. Notice that complies with Condition XII.A above is prompt for deviations that constitute excess emissions;
[A.A.C. R18-2-306.A.5.b.i]
2. Notice that is submitted within two working days of discovery of the deviation is prompt for deviations of permit conditions identified by Condition II.B.1 of Attachment “B”;
[A.A.C. R18-2-306.A.5.b.ii]
3. Except as provided in Conditions XII.B.1 and 2, prompt notification of all other types of deviations shall be semiannually, concurrent with the semiannual compliance certifications required in Section VI.A, and can be submitted via myDEQ, the Arizona Department of Environmental Quality’s online portal.
[A.A.C. R18-2-306.A.5.b.ii]

C. Emergency Provision

1. An “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, that require immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
[A.A.C. R18-2-306.E.1]
2. An emergency constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if Condition XII.C.3 below is met.
[A.A.C. R18-2-306.E.2]
3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
[A.A.C. R18-2-306.E.3]
 - a. An emergency occurred and that the Permittee can identify the cause(s) of the emergency;
[A.A.C. R18-2-306.E.3.a]
 - b. The permitted facility was being properly operated at the time of the emergency;
[A.A.C. R18-2-306.E.3.b]
 - c. During the period of the emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
[A.A.C. R18-2-306.E.3.c]

- d. The Permittee submitted notice of the emergency to the Director by certified mail, facsimile, or hand delivery within two working days of the time when emission limitations were exceeded due to the emergency. This notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective action taken.

[A.A.C. R18-2-306.E.3.d]

4. In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

[A.A.C. R18-2-306.E.4]

5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.

[A.A.C. R18-2-306.E.5]

D. Affirmative Defenses for Excess Emissions Due to Malfunctions, Startup, and Shutdown

1. Applicability

A.A.C. R18-2-310 establishes affirmative defenses for certain emissions in excess of an emission standard or limitation and applies to all emission standards or limitations except for standards or limitations:

- a. Promulgated pursuant to Sections 111 or 112 of the Act;
[A.A.C. R18-2-310.A.1]
- b. Promulgated pursuant to Titles IV or VI of the Clean Air Act;
[A.A.C. R18-2-310.A.2]
- c. Contained in any Prevention of Significant Deterioration (PSD) or New Source Review (NSR) permit issued by the U.S. EPA;
[A.A.C. R18-2-310.A.3]
- d. Contained in A.A.C. R18-2-715.F; or
[A.A.C. R18-2-310.A.4]
- e. Included in a permit to meet the requirements of A.A.C. R18-2-406.A.5.
[A.A.C. R18-2-310.A.5]

2. Affirmative Defense for Malfunctions

Emissions in excess of an applicable emission limitation due to malfunction shall constitute a violation. When emissions in excess of an applicable emission limitation are due to a malfunction, the Permittee has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the Permittee has complied with the reporting requirements of A.A.C. R18-2-310.01 and has demonstrated all of the following:

[A.A.C. R18-2-310.B]

- a. The excess emissions resulted from a sudden and unavoidable breakdown of process equipment or air pollution control equipment beyond the reasonable control of the Permittee;
[A.A.C. R18-2-310.B.1]
- b. The air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
[A.A.C. R18-2-310.B.2]
- c. If repairs were required, the repairs were made in an expeditious fashion when the applicable emission limitations were being exceeded. Off-shift labor and overtime were utilized where practicable to ensure that the repairs were made as expeditiously as possible. If off-shift labor and overtime were not utilized, the Permittee satisfactorily demonstrated that the measures were impracticable;
[A.A.C. R18-2-310.B.3]
- d. The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;
[A.A.C. R18-2-310.B.4]
- e. All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;
[A.A.C. R18-2-310.B.5]
- f. The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance;
[A.A.C. R18-2-310.B.6]
- g. During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in Title 18, Chapter 2, Article 2 of the Arizona Administrative Code that could be attributed to the emitting source;
[A.A.C. R18-2-310.B.7]
- h. The excess emissions did not stem from any activity or event that could have been foreseen and avoided, or planned, and could not have been avoided by better operations and maintenance practices;
[A.A.C. R18-2-310.B.8]
- i. All emissions monitoring systems were kept in operation if at all practicable; and
[A.A.C. R18-2-310.B.9]
- j. The Permittee's actions in response to the excess emissions were documented by contemporaneous records.
[A.A.C. R18-2-310.B.10]

3. Affirmative Defense for Startup and Shutdown

- a. Except as provided in Condition XII.D.3 below, and unless otherwise provided for in the applicable requirement, emissions in excess of an applicable emission limitation due to startup and shutdown shall constitute a violation. When emissions in excess of an applicable emission limitation are due to startup and shutdown, the Permittee has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the Permittee has complied with the reporting requirements of A.A.C. R18-2-310.01 and has demonstrated all of the following:
- [A.A.C. R18-2-310.C.1]
- (1) The excess emissions could not have been prevented through careful and prudent planning and design;
[A.A.C. R18-2-310.C.1.a]
 - (2) If the excess emissions were the result of a bypass of control equipment, the bypass was unavoidable to prevent loss of life, personal injury, or severe damage to air pollution control equipment, production equipment, or other property;
[A.A.C. R18-2-310.C.1.b]
 - (3) The air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
[A.A.C. R18-2-310.C.1.c]
 - (4) The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;
[A.A.C. R18-2-310.C.1.d]
 - (5) All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;
[A.A.C. R18-2-310.C.1.e]
 - (6) During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in Title 18, Chapter 2, Article 2 of the Arizona Administrative Code that could be attributed to the emitting source;
[A.A.C. R18-2-310.C.1.f]
 - (7) All emissions monitoring systems were kept in operation if at all practicable; and
[A.A.C. R18-2-310.C.1.g]
 - (8) Contemporaneous records documented the Permittee's actions in response to the excess emissions.
[A.A.C. R18-2-310.C.1.h]

XIII. RECORDKEEPING REQUIREMENTS

- b. If excess emissions occur due to a malfunction during routine startup and shutdown, then those instances shall be treated as other malfunctions subject to Condition XII.D.2 above.

[A.A.C. R18-2-310.C.2]

4. Affirmative Defense for Malfunctions During Scheduled Maintenance

If excess emissions occur due to a malfunction during scheduled maintenance, then those instances will be treated as other malfunctions subject to Condition XII.D.2 above.

[A.A.C. R18-2-310.D]

5. Demonstration of Reasonable and Practicable Measures

For an affirmative defense under Condition XII.D.2 or XII.D.3, the Permittee shall demonstrate, through submission of the data and information required by this Condition XII.D and Condition XII.A.1 above, that all reasonable and practicable measures within the Permittee's control were implemented to prevent the occurrence of the excess emissions.

[A.A.C. R18-2-310.E]

XIII. RECORDKEEPING REQUIREMENTS

- A. The Permittee shall keep records of all required monitoring information including, but not limited to, the following:

1. The date, place as defined in the permit, and time of sampling or measurements;
[A.A.C. R18-2-306.A.4.a.i]
2. The date(s) any analyses were performed;
[A.A.C. R18-2-306.A.4.a.ii]
3. The name of the company or entity that performed the analyses;
[A.A.C. R18-2-306.A.4.a.iii]
4. A description of the analytical techniques or methods used;
[A.A.C. R18-2-306.A.4.a.iv]
5. The results of analyses; and
[A.A.C. R18-2-306.A.4.a.v]
6. The operating conditions as existing at the time of sampling or measurement.
[A.A.C. R18-2-306.A.4.a.vi]

- B. The Permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings or other data recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

[A.A.C. R18-2-306.A.4.b]

XIV. DUTY TO PROVIDE INFORMATION

- A. The Permittee shall furnish to the Director, within a reasonable time, any information that the Director may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the Director copies of records required to be kept by the permit. For information claimed to be confidential, the Permittee shall furnish an additional copy of such records directly to the Administrator along with a claim of confidentiality.

[A.A.C. R18-2-304.G and -306.A.8.e]

- B. If the Permittee has failed to submit any relevant facts or has submitted incorrect information in the permit application, the Permittee shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.

[A.A.C. R18-2-304.H]

XV. PERMIT AMENDMENT OR REVISION

The Permittee shall apply for a permit amendment or revision for changes to the facility which does not qualify for a facility change without revision under Section XVII below, as follows:

- A. Facility Changes that Require a Permit Revision; [A.A.C. R18-2-317.01]
- B. Administrative Permit Amendment; [A.A.C. R18-2-318]
- C. Minor Permit Revision; and [A.A.C. R18-2-319]
- D. Significant Permit Revision. [A.A.C. R18-2-320]
- E. The applicability and requirements for such action are defined in the above referenced regulations.

XVI. FACILITY CHANGE WITHOUT A PERMIT REVISION

- A. Except for a physical change or change in the method of operation at a Class II source requiring a permit revision under A.A.C. R18-2-317.01, or a change subject to logging or notice requirements in Conditions XVI.B and XVI.C, a change at a Class II source shall not be subject to revision, notice, or logging requirements under this Section.

[A.A.C. R18-2-317.02.A]

- B. Except as otherwise provided in the conditions applicable to an emissions cap created under A.A.C. R18-2-306.02, the following changes may be made if the source keeps on site records of the changes according to Appendix 3 of the Arizona Administrative Code:

[A.A.C. R18-2-317.02.B]

1. Implementing an alternative operating scenario, including raw materials changes;

2. Changing process equipment, operating procedures, or making any other physical change if the permit requires the change to be logged;
 3. Engaging in any new insignificant activity listed in A.A.C. R18-2-101.68 but not listed in the permit;
 4. Replacing an item of air pollution control equipment listed in the permit with an identical (same model, different serial number) item. The Director may require verification of efficiency of the new equipment by performance tests; and
 5. A change that results in a decrease in actual emissions if the source wants to claim credit for the decrease in determining whether the source has a net emissions increase for any purpose. The logged information shall include a description of the change that will produce the decrease in actual emissions. A decrease that has not been logged is creditable only if the decrease is quantifiable, enforceable, and otherwise qualifies as a creditable decrease.
- C. Except as provided in the conditions applicable to an emissions cap created under A.A.C. R18-2-306.02, the following changes may be made if the source provides written notice to the Department in advance of the change as provided below:
- [A.A.C. R18-2-317.02.C]
1. 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. The Director may require verification of efficiency of the new equipment by performance tests;
 2. 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;
 3. 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. The Director may require verification of efficiency of the new equipment by performance tests;
 4. A change that would trigger an applicable requirement that already exists in the permit: 30 days unless otherwise required by the applicable requirement;
 5. A change that amounts to reconstruction of the source or an affected facility: 7 days. For the purposes of this subsection, reconstruction of a source or an affected facility shall be presumed if the fixed capital cost of the new components exceeds 50% of the fixed capital cost of a comparable entirely new source or affected facility and the changes to the components have occurred over the 12 consecutive months beginning with commencement of construction; and
 6. A change that will result in the emissions of a new regulated air pollutant above an applicable regulatory threshold but that does not trigger a new applicable requirement for that source category: 30 days. For purposes of this requirement,

an applicable regulatory threshold for a conventional air pollutant shall be 10% of the applicable major source threshold for that pollutant.

- D.** For each change under Condition XVI.C, the written notice shall be by certified mail or hand delivery and shall be received by the Director the minimum amount of time in advance of the change. Notifications of changes associated with emergency conditions, such as malfunctions necessitating the replacement of equipment, may be provided with less than required notice, 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. The written notice shall include:

[A.A.C. R18-2-317.02.D]

1. When the proposed change will occur;
2. A description of the change;
3. Any change in emissions of regulated air pollutants; and
4. Any permit term or condition that is no longer applicable as a result of the change.

- E.** A source may implement any change in Condition XVI.C without the required notice by applying for a minor permit revision under A.A.C. R18-2-319.

[A.A.C. R18-2-317.02.E]

- F.** The permit shield described in A.A.C. R18-2-325 shall not apply to any change made under this Section, other than implementation of an alternate operating scenario under Condition XVI.B.1.

[A.A.C. R18-2-317.02.F]

- G.** Notwithstanding any other part of this Section, the Director may require a permit to be revised for any change that, when considered together with any other changes submitted by the same source under this Section over the term of the permit, constitutes a change under subsection A.A.C. R18-2-317.01.A.

[A.A.C. R18-2-317.02.G]

- H.** If a source change is described under both Conditions XVI.B and C, the source shall comply with Condition XVI.C. If a source change is described under both Condition XVI.C and A.A.C. R18-2-317.01.B, the source shall comply with A.A.C. R18-2-317.01.B.

[A.A.C. R18-2-317.02.H]

- I.** A copy of all logs required under Condition XVI.B shall be filed with the Director within 30 days after each anniversary of the permit issuance date. If no changes were made at the source requiring logging, a statement to that effect shall be filed instead.

[A.A.C. R18-2-317.02.I]

- J.** Logging Requirements

[Arizona Administrative Code, Appendix 3]

1. Each log entry required by a change under Condition XVI.B shall include at least the following information:

- a. A description of the change, including:
 - (1) A description of any process change;
 - (2) A description of any equipment change, including both old and new equipment descriptions, model numbers, and serial numbers, or any other unique equipment ID number; and
 - (3) A description of any process material change.
 - b. The date and time that the change occurred.
 - c. The provision of A.A.C. R18-2-317.02.B that authorizes the change to be made with logging.
 - d. The date the entry was made and the first and last name of the person making the entry.
2. Logs shall be kept for five (5) years from the date created. Logging shall be performed in indelible ink in a bound log book with sequentially number pages, or in any other form, including electronic format, approved by the Director.

XVII. TESTING REQUIREMENTS

- A.** The Permittee shall conduct performance tests as specified in the permit and at such other times as may be required by the Director.

[A.A.C. R18-2-312.A]

- B.** Operational Conditions during Performance Testing

Performance tests shall be conducted under such conditions as the Director shall specify to the plant operator based on representative performance of the source. The Permittee shall make available to the Director such records as may be necessary to determine the conditions of the performance tests. Operations during periods of start-up, shutdown, and malfunction (as defined in A.A.C. R18-2-101) shall not constitute representative conditions of performance tests unless otherwise specified in the applicable standard.

[A.A.C. R18-2-312.C]

- C.** Performance Tests shall be conducted and data reduced in accordance with the test methods and procedures contained in the Arizona Testing Manual unless modified by the Director pursuant to A.A.C. R18-2-312.B.

[A.A.C. R18-2-312.B]

- D.** Test Plan

At least 14 working days prior to performing a test, the Permittee shall submit a test plan to the Director, which must include the following, in addition to all other applicable requirements, as identified in the Arizona Testing Manual:

[A.A.C. R18-2-312.B]

1. Test duration;

2. Test location(s);
3. Test method(s); and
4. Source operation and other parameters that may affect test results.

E. Stack Sampling Facilities

The Permittee shall provide, or cause to be provided, performance testing facilities as follows:

[A.A.C. R18-2-312.E]

1. Sampling ports adequate for test methods applicable to the facility;
2. Safe sampling platform(s);
3. Safe access to sampling platform(s); and
4. Utilities for sampling and testing equipment.

F. Interpretation of Final Results

Each performance test shall consist of three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard, the arithmetic mean of the results of the three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the three runs is required to be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the Permittee's control, compliance may, upon the Director's approval, be determined using the arithmetic mean of the results of the other two runs. If the Director or the Director's designee is present, tests may only be stopped with the Director's or such designee's approval. If the Director or the Director's designee is not present, tests may only be stopped for good cause. Good cause includes: forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the Permittee's control. Termination of any test without good cause after the first run is commenced shall constitute a failure of the test. Supporting documentation, which demonstrates good cause, must be submitted.

[A.A.C. R18-2-306.A.3.c and A.A.C. R18-2-312.F]

G. Report of Final Test Results

A written report of the results of performance tests conducted pursuant to 40 CFR 63, shall be submitted to the Director within 60 days after the test is performed. A written report of the results of all other performance tests shall be submitted within 4 weeks after the test is performed, or as otherwise provided in the Arizona Testing Manual. All performance testing reports shall be submitted in accordance with the Arizona Testing Manual and A.A.C. R18-2-312.A.

[A.A.C. R18-2-312.A and B]

H. Extension of Performance Test Deadline

For performance testing required under Condition XVII.A above, the Permittee may request an extension to a performance test deadline due to a force majeure event as follows:
[A.A.C. R18-2-312.J]

1. If a force majeure event is about to occur, occurs, or has occurred for which the Permittee intends to assert a claim of force majeure, the Permittee shall notify the Director in writing as soon as practicable following the date the Permittee first knew, or through due diligence should have known that the event may cause or caused a delay in testing beyond the regulatory deadline. The notification must occur before the performance test deadline unless the initial force majeure or a subsequent force majeure event delays the notice, and in such cases, the notification shall be given as soon as practicable.
[A.A.C. R18-2-312.J.1]
2. The Permittee shall provide to the Director a written description of the force majeure event and a rationale for attributing the delay in testing beyond the regulatory deadline to the force majeure; describe the measures taken or to be taken to minimize the delay; and identify a date by which the Permittee proposes to conduct the performance test. The performance test shall be conducted as soon as practicable after the force majeure event occurs.
[A.A.C. R18-2-312.J.2]
3. The decision as to whether or not to grant an extension to the performance test deadline is solely within the discretion of the Director. The Director shall notify the Permittee in writing of approval or disapproval of the request for an extension as soon as practicable.
[A.A.C. R18-2-312.J.3]
4. Until an extension of the performance test deadline has been approved by the Director under Conditions XVII.H.1, 2, and 3 above, the Permittee remains subject to the requirements of Section XVII.
[A.A.C. R18-2-312.J.4]
5. For purposes of this Section XVII, a “force majeure event” means an event that will be or has been caused by circumstances beyond the control of the Permittee, its contractors, or any entity controlled by the Permittee that prevents it from complying with the regulatory requirement to conduct performance tests within the specified timeframe despite the Permittee's best efforts to fulfill the obligation. Examples of such events are acts of nature, acts of war or terrorism, or equipment failure or safety hazard beyond the control of the Permittee.
[A.A.C. R18-2-312.J.5]

XVIII. PROPERTY RIGHTS

This permit does not convey any property rights of any sort, or any exclusive privilege.
[A.A.C. R18-2-306.A.8.d]

XIX. SEVERABILITY CLAUSE

XX. PERMIT SHIELD

The provisions of this permit are severable. In the event of a challenge to any portion of this permit, or if any portion of this permit is held invalid, the remaining permit conditions remain valid and in force.

[A.A.C. R18-2-306.A.7]

XX. PERMIT SHIELD

Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements identified in the portions of this permit subtitled "Permit Shield". The permit shield shall not apply to minor revisions pursuant to Condition XV.B of this Attachment and any facility changes without a permit revision pursuant to Section XVII of this Attachment.

[A.A.C. R18-2-317.F, - 320, and -325]

XXI. PROTECTION OF STRATOSPHERIC OZONE

If this source becomes subject to the provisions of 40 CFR Part 82, then the Permittee shall comply with these provisions accordingly.

[40 CFR Part 82]

XXII. APPLICABILITY OF NSPS/NESHAP GENERAL PROVISIONS

For all equipment subject to a New Source Performance Standard or a National Emission Standard for Hazardous Air Pollutants, the Permittee shall comply with all applicable requirements contained in Subpart A of Title 40, Chapter 60 and Chapter 63 of the Code of Federal Regulation.

[40 CFR Part 60 Subpart A and Part 63 Subpart A]

ATTACHMENT "B": SPECIFIC CONDITIONS

I. RELATIONSHIP OF PERMIT TO APPLICABLE STATE IMPLEMENTATION PLAN

This permit is issued pursuant to the provisions of the Arizona Revised Statutes (ARS) and constitutes an installation permit for the purpose of the applicable State Implementation Plan.

[ARS § 49-404.c and -426]

II. FACILITY-WIDE REQUIREMENTS

A. Opacity

1. Instantaneous Surveys and Six-Minute Observations

a. Instantaneous Surveys

Any instantaneous survey required by this permit shall be determined by EPA Reference Method 9.

[A.A.C. R18-2-311.b]

b. Six-Minute Observations

Any six-minute observation required by this permit shall be determined by EPA Reference Method 9.

[A.A.C. R18-2-311.b]

c. The Permittee shall have on site or on call a person certified in EPA Reference Method 9.

[A.A.C. R18-2-306.A.3.c]

2. Monitoring, Recordkeeping, and Reporting Requirements

[A.A.C. R18-2-306.A.3.c]

a. At the frequency specified in the following sections of this permit, the Permittee shall conduct an instantaneous survey of visible emissions from both process stack sources, when in operation, and fugitive dust sources.

b. If the visible emissions on an instantaneous basis appears less than or equal to the applicable opacity standard, then the Permittee shall keep a record of the name of the observer, the date on which the instantaneous survey was made, and the results of the instantaneous survey.

c. If the visible emissions on an instantaneous basis appears greater than the applicable opacity standard, then the Permittee shall immediately conduct a six-minute observation of the visible emissions.

(1) If the six-minute observation of the visible emissions is less than or equal to the applicable opacity standard, then the Permittee shall record the name of the observer, the date on which the six-minute observation was made, and the results of the six-minute observation.

III. POZZOLAN PROCESSING REQUIREMENTS

- (2) If the six-minute observation of the visible emissions is greater than the applicable opacity standard, then the Permittee shall do the following:
 - (a) Adjust or repair the controls or equipment to reduce opacity to less than or equal to the opacity standard;
 - (b) Record the name of the observer, the date on which the six-minute observation was made, the results of the six-minute observation, and all corrective action taken; and
 - (c) Report the event as an excess emission for opacity in accordance with Condition XII.A of Attachment "A".
 - (d) Conduct another six-minute observation to document the effectiveness of the adjustments or repairs completed.

B. Reporting Requirements

1. Deviations from the following Attachment "B" permit conditions shall be promptly reported in accordance with Condition XII.B.2 of Attachment "A":

[A.A.C. R18-2-306.A.5.b]

 - a. Condition III.C.1;
 - b. Condition III.C.2;
 - c. Condition III.C.3;
 - d. Condition III.C.4;
 - e. Condition III.C.5;
 - f. Condition III.C.6;
 - g. Condition III.C.7; and
 - h. Condition IV.C.

III. POZZOLAN PROCESSING REQUIREMENTS

A. Applicability

Section III applies to operation of the grinding mill; belt conveyors; bucket elevators; silos; storage bins; and associated baghouses, bin vents, dust collectors, and filter modules subject to New Source Performance Standard (NSPS) Subpart OOO (Standards of Performance for Non-Metallic Mineral Processing Facilities).

[40 CFR 60.670(a)(1)]

B. Opacity and Particulate Matter

1. The Permittee shall not allow to be discharged into the atmosphere from any affected facility stack emissions which contain particulate matter in excess of 0.032 grams per dry standard cubic meter (0.014 grains per dry standard cubic foot).

[40 CFR 60.672(a) and Table 2 to 40 CFR 60 Subpart OOO]

2. The Permittee shall not allow to be discharged into the atmosphere from any affected facility stack emissions which contain particulate matter in excess of the limits identified in the table below corresponding to each control device:

[A.A.C. R18-2-306.A.2]

Table 1: Emission Limits

Equipment ID	Emission Point	Emission Limit
1651-BF01	Product Recovery Baghouse	1.69 lb/hr
1621-DE01	Mill Feed Breaker Discharge Baghouse	.00579 lb/hr

3. The Permittee shall not allow to be discharged into the atmosphere dry control device stack emissions which exhibit visible emissions greater than 7 percent opacity from any individual enclosed storage bin.

[A.A.C. R18-2-331.A.3.f, 40 CFR 60.672(a) and Table 2 to 40 CFR 60 Subpart OOO]

[Material permit conditions are indicated by underline and italics]

4. Any baghouse that controls emissions from an individual, enclosed storage bin is exempt from the applicable stack PM concentration limit in Condition III.B.1, but must meet the applicable stack opacity limit in Condition III.B.3.

[40 CFR 60.672(f)]

5. Truck dumping of nonmetallic minerals into any screening operation, feed hopper, or crusher is exempt from the requirements of this Section.

[40 CFR 60.672(d)]

C. Air Pollution Control

The Permittee shall install the following control equipment prior to start-up of the corresponding process unit(s) and shall operate the equipment at all times when any of the corresponding process unit(s) are in operation:

1. The Permittee shall install, operate, and maintain the product recovery baghouse (1651-BF01) in accordance with vendor specifications to recover product from the mill.

[A.A.C. R18-2-306.A.2]

2. The Permittee shall install, operate, and maintain the mill feed breaker baghouse (1621-DE01) in accordance with vendor specifications to control particulate matter emissions associated with the mill feed breaker discharge.

[A.A.C. R18-2-306.A.2 and -331.A.3.d and e]

[Material permit conditions are indicated by underline and italics]

3. The Permittee shall install, operate, and maintain the mill feed to rotary valve filter (1621-DE02) in accordance with vendor specifications to control particulate matter emissions associated with the conveyer belt feeding materials into the grinding mill.

[A.A.C. R18-2-306.A.2 and -331.A.3.d and e]
[Material permit conditions are indicated by underline and italics]
4. The Permittee shall install, operate, and maintain the product storage transfer baghouse (BF-5066) in accordance with vendor specifications to control particulate matter emissions associated with the transfer of product from the product recovery baghouse to the bucket elevator.

[A.A.C. R18-2-306.A.2 and -331.A.3.d and e]
[Material permit conditions are indicated by underline and italics]
5. The Permittee shall install, operate, and maintain the storage silo bin vents (BF-5251 and BF-5351) in accordance with vendor specifications to control particulate matter emissions associated with transferring and storing product in the storage silos.

[A.A.C. R18-2-306.A.2]
6. The Permittee shall install, operate, and maintain the cartridge filter modules (CF-5260 and CF-5360) in accordance with vendor specifications to control particulate matter emissions associated with product truck loading.

[A.A.C. R18-2-306.A.2 and -331.A.3.d and e]
[Material permit conditions are indicated by underline and italics]
7. The Permittee shall install, operate, and maintain the off-spec bin vent (BF-5041) in accordance with vendor specifications to control particulate matter emissions associated with storage of materials in the off-spec bin.

[A.A.C. R18-2-306.A.2 and -331.A.3.d and e]
[Material permit conditions are indicated by underline and italics]
8. At points where material may accumulate around process equipment, Best Management Practices will be implemented to ensure areas are maintained to minimized emissions of particulate matter.

[A.A.C. R18-2-306.A.2]

D. Monitoring, Recordkeeping, and Reporting

1. The Permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring devices is inoperative.

[40 CFR 60.7(b)]
2. The Permittee shall conduct quarterly 30-minute visible emissions inspections using EPA Method 22 (40 CFR part 60, appendix A-7) on the product recovery baghouse (1651-BF01), mill feed breaker discharge baghouse (1621-DE01), product storage transfer baghouse (BF-5066), storage silo bin vents (BF5251 and BF-5351), and off spec bin vent (BF-5041). The Method 22 test shall be conducted while the baghouse is operating. The test is successful if no visible emissions are

observed. If any visible emissions are observed, the Permittee must initiate corrective action within 24 hours to return the baghouse to normal operation. The Permittee shall record each Method 22 test, including the date and any corrective actions taken, in the logbook required under Condition III.D.4. The Permittee may establish a different baghouse-specific success level for the visible emissions test (other than no visible emissions) by conducting a PM performance test according to Condition III.F.3 simultaneously with a Method 22 to determine what constitutes normal visible emissions from that affected facility's baghouse when it is in compliance with the applicable PM concentration limit in Condition III.B.3. The revised visible emissions success level must be incorporated into the permit for the affected facility.

[40 CFR 60.674(c)]

3. As an alternative to the periodic Method 22 visible emissions inspections specified in Condition III.D.1, the Permittee may use a bag leak detection system. The Permittee shall install, operate, and maintain the bag leak detection system according to the following conditions:

[40 CFR 60.674(d)]

- a. Each bag leak detection system must meet the following specifications and requirements:

- (1) The bag leak detection system must be certified by the manufacturer to be capable of detecting PM emissions at concentrations of 1 milligram per dry standard cubic meter (0.00044 grains per actual cubic foot) or less.

[40 CFR 60.674(d)(1)(i)]

- (2) The bag leak detection system sensor must provide output of relative PM loadings. The Permittee shall continuously record the output from the bag leak detection system using electronic or other means (e.g., using a strip chart recorder or a data logger).

[40 CFR 60.674(d)(1)(ii)]

- (3) The bag leak detection system must be equipped with an alarm system that will sound when the system detects an increase in relative particulate loading over the alarm set point established according to Condition III.D.3.a(1) of this Section, and the alarm must be located such that it can be heard by the appropriate plant personnel.

[40 CFR 60.674(d)(1)(iii)]

- (4) In the initial adjustment of the bag leak detection system, the Permittee shall establish, at a minimum, the baseline output by adjusting the sensitivity (range) and the averaging period of the device, the alarm set points, and the alarm delay time.

[40 CFR 60.674(d)(1)(iv)]

- (5) Following initial adjustment, the Permittee shall not adjust the averaging period, alarm set point, or alarm delay time without approval from the Director except as provided in Condition III.D.3.a(6).

[40 CFR 60.674(d)(1)(v)]

- (6) Once per quarter, the Permittee may adjust the sensitivity of the bag leak detection system to account for seasonal effects, including temperature and humidity, according to the procedures identified in the site-specific monitoring plan required by Condition III.D.3.b.

[40 CFR 60.674(d)(1)(vi)]

- (7) The Permittee shall install the bag leak detection sensor downstream of the fabric filter.

[40 CFR 60.674(d)(1)(vii)]

- (8) Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.

[40 CFR 60.674(d)(1)(viii)]

- b. The Permittee shall develop and submit to the Director for approval of a site-specific monitoring plan for each bag leak detection system. The Permittee shall operate and maintain the bag leak detection system according to the site specific monitoring plan at all times. Each monitoring plan must describe the following items:

[40 CFR 60.674(d)(2)]

- (1) Installation of the bag leak detection system;

[40 CFR 60.674(d)(2)(i)]

- (2) Initial and periodic adjustment of the bag leak detection system, including how the alarm set-point will be established;

[40 CFR 60.674(d)(2)(ii)]

- (3) Operation of the bag leak detection system, including quality assurance procedures;

[40 CFR 60.674(d)(2)(iii)]

- (4) How the bag leak detection system will be maintained, including a routine maintenance schedule and spare parts inventory list;

[40 CFR 60.674(d)(2)(iv)]

- (5) How the bag leak detection system output will be recorded and stored; and

[40 CFR 60.674(d)(2)(v)]

- (6) Corrective action procedures as specified in Condition III.D.3.c of this Attachment. In approving the site-specific monitoring plan, the Director may allow Permittees more than 3 hours to alleviate a specific condition that causes an alarm if the owner or operator

III. POZZOLAN PROCESSING REQUIREMENTS

identifies in the monitoring plan this specific condition as one that could lead to an alarm, adequately explains why it is not feasible to alleviate this condition within 3 hours of the time the alarm occurs, and demonstrates that the requested time will ensure alleviation of this condition as expeditiously as practicable.

[40 CFR 60.674(d)(2)(vi)]

- c. For each bag leak detection system, the Permittee shall initiate procedures to determine the cause of every alarm within 1 hour of the alarm. Except as provided in Condition III.D.3.b(6), the Permittee shall must alleviate the cause of the alarm within 3 hours of the alarm by taking whatever corrective action(s) are necessary. Corrective actions may include, but are not limited to the following:

[40 CFR 60.674(d)(3)]

- (1) Inspecting the fabric filter for air leaks, torn or broken bags or filter media, or any other condition that may cause an increase in PM emissions;

[40 CFR 60.674(d)(3)(i)]

- (2) Sealing off defective bags or filter media;

[40 CFR 60.674(d)(3)(ii)]

- (3) Replacing defective bags or filter media or otherwise repairing the control device;

[40 CFR 60.674(d)(3)(iii)]

- (4) Sealing off a defective fabric filter compartment;

[40 CFR 60.674(d)(3)(iv)]

- (5) Cleaning the bag leak detection system probe or otherwise repairing the bag leak detection system; or

[40 CFR 60.674(d)(3)(v)]

- (6) Shutting down the process producing the PM emissions.

[40 CFR 60.674(d)(3)(v)]

4. The Permittee shall record each periodic inspection required under Condition III.D.2, including dates and any corrective actions taken, in a logbook (in written or electronic format). The Permittee shall keep the logbook onsite and make hard or electronic copies (whichever is requested) of the logbook available to the Director upon request.

[40 CFR 60.676(b)(1)]

5. For each bag leak detection system installed and operated according to Condition III.D.3, the Permittee shall keep the following records:

[40 CFR 60.676(b)(2)]

- a. Records of bag leak detection system output;

[40 CFR 60.676(b)(2)(i)]

- b. Records of bag leak detection system adjustments, including the date and time of the adjustment, the initial bag leak detection system settings, and the final bag leak detection system settings; and
[40 CFR 60.676(b)(2)(ii)]
- c. The date and time of all bag leak detection system alarms, the time that procedures to determine the cause of the alarm were initiated, the cause of the alarm, an explanation of the actions taken, the date and time the cause of the alarm was alleviated, and whether the cause of the alarm was alleviated within 3 hours of the alarm.
[40 CFR 60.676(b)(2)(iii)]
6. The Permittee shall submit written reports of the results of all performance tests conducted to demonstrate compliance with the standards set forth in Condition 0 of this Attachment, including reports of opacity observations made using Method 9 (40 CFR part 60, appendix A-4) to demonstrate compliance with Conditions III.B.3 and III.B.4.
[40 CFR 60.676(f)]
7. The Permittee shall install and maintain instrumentation that measures pressure drop across the mill feed to rotary valve filter (1621-DE02), product storage transfer baghouse (BF-5066), cartridge filter silo loadouts (CF-5260 and CF-5360), storage silo bin vents (BF-5251 and BF-5351), and off spec bin vent (BF-5041).
[A.A.C R18-2-306.A.3.c and -331.A.3.c]
8. The Permittee shall conduct weekly inspections of pressure drop across the equipment specified in Condition III.D.7 above. The Permittee shall record each inspection, including date and time of inspection, pressure drop reading, and corrective actions taken (if any).
[A.A.C R18-2-306.A.3.c]
9. Black Light Inspection
- If the Permittee opts to conduct quarterly EPA Method 22 visible emissions inspections to comply with the requirements of this Section, the Permittee shall also conduct black light inspections for the Product Recovery Baghouse (1651-BF01) and Mill Feed Breaker Discharge Baghouse (1621-DE01) according to the following requirements:
- a. The Permittee shall conduct periodic black light inspections on the bags contained in the Product Recovery Baghouse (1651-BF01) and Mill Feed Breaker Discharge Baghouse (1621-DE01) in an effort to detect broken or leaking bags. The black light inspections shall be performed every 6 months.
[A.A.C. R-18-2-306.A.3.c]
- b. If broken or leaking bags are detected, the Permittee shall repair or replace the bags as soon as practicable. Upon completion of the inspection, the Permittee shall record the name of the inspector, the date, the time, and the results of the inspections and repairs.

[A.A.C. R-18-2-306.A.3.c]

- c. If the facility is not operating, the black light inspection is not required to be performed for the duration of non-operation. Within 15 days of resumption of operation, the Permittee shall perform the black light inspection. The Permittee shall document periods of non-operation.

[A.A.C. R-18-2-306.A.3.c]

E. Notification

1. The Permittee shall submit a notification of the actual date of initial startup of each affected facility to the Director. For a combination of affected facilities in a production line that begin actual initial startup on the same day, a single notification of startup may be submitted by the Permittee to the Director. The notification shall be postmarked within 15 days after such date and shall include a description of each affected facility, equipment manufacturer, and serial number of the equipment, if available.

[40 CFR 60.676(i)(1) and 60.7(a)(3)]

2. The Permittee shall submit a notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in 40 CFR 60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Director may request additional relevant information subsequent to this notice.

[40 CFR 60.7(a)(4)]

F. Performance Testing

1. Within 60 days after achieving maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility, the Permittee shall demonstrate initial compliance with the applicable PM and opacity limits for stack emissions contained in Condition 0 by conducting initial performance tests according to 40 CFR 60.8 and the test methods and procedures of Condition III.F.3.

[40 CFR 60.8(a) and Table 2 to 40 CFR 60 Subpart 000]

2. The Permittee shall conduct subsequent performance tests for the PM Standards in Condition III.B.2 on an annual basis (between 11 and 13 months from the date of the previous test) for the Product Recovery Baghouse (1651-BF01). For the Mill Feed Breaker Discharge Baghouse (1621-DE01), if the result of the performance test required by Condition III.F.1 above is below 75% of the applicable emission limit in Condition III.B.2, subsequent performance tests shall be conducted on a biannual basis (between 23 and 25 months from the date of the previous test). If the test result for these baghouses is above 75% of the applicable emission limit, subsequent performance test shall be conducted on an annual basis (between 11 and 13 months from the date of the previous test).

III. POZZOLAN PROCESSING REQUIREMENTS

[A.A.C. R18-2-306.A.3.c and -312]

3. The Permittee shall determine compliance with the PM standards in Condition III.B.2 as follows:

[40 CFR 60.675(b)]

 - a. Except as specified in Conditions III.F.6.c and III.F.6.d, Method 5 or Method 17 shall be used to determine the particulate matter concentration. The sample volume shall be at least 1.70 dscm (60 dscf). For Method 5, if the gas stream being sampled is at ambient temperature, the sampling probe and filter may be operated without heaters. If the gas stream is above ambient temperature, the sampling probe and filter may be operated at a temperature high enough, but no higher than 121 °C (250 °F), to prevent water condensation on the filter.

[40 CFR 60.675(b)(1)]
4. In determining compliance with the opacity of stack emissions from any baghouse that controls emissions only from an individual enclosed storage bin under Condition III.B.3 of this Attachment, using Method 9, the duration of the Method 9 observations shall be 1 hour (ten 6-minute averages).

[40 CFR 60.675(c)(2)(i)]
5. The duration of the Method 9 observations may be reduced to the duration the affected facility operates (but not less than 30 minutes) for baghouses that control storage bins or enclosed truck or railcar loading stations that operate for less than 1 hour at a time.

[40 CFR 60.675(c)(2)(ii)]
6. The Permittee may use the following as alternative to the reference methods and procedures specified in this Section:

[40 CFR 60.675(e)]

 - a. For the method and procedure of Conditions III.F.4 and III.F.5 of this section, if emissions from two or more facilities continuously interfere so that the opacity of fugitive emissions from an individual affected facility cannot be read, either of the following procedures may be used:

[40 CFR 60.675(e)(1)]

 - (1) Use for the combined emission stream the highest fugitive opacity standard applicable to any of the individual affected facilities contributing to the emissions stream.

[40 CFR 60.675(e)(1)(i)]
 - (2) Separate the emissions so that the opacity of emissions from each affected facility can be read.

[40 CFR 60.675(e)(1)(ii)]
 - b. A single visible emission observer may conduct visible emission observations for up to three fugitive, stack, or vent emission points within a 15-second interval if the following conditions are met:

[40 CFR 60.675(e)(2)]

III. POZZOLAN PROCESSING REQUIREMENTS

- (1) No more than three emission points may be read concurrently.
 [40 CFR 60.675(e)(2)(i)]
- (2) All three emission points must be within a 70 degree viewing sector or angle in front of the observer such that the proper sun position can be maintained for all three points.
 [40 CFR 60.675(e)(2)(ii)]
- (3) If an opacity reading for any one of the three emission points equals or exceeds the applicable standard, then the observer must stop taking readings for the other two points and continue reading just that single point.
 [40 CFR 60.675(e)(2)(iii)]

c. Method 5I of appendix A-3 of this part may be used to determine the PM concentration as an alternative to the methods specified in Condition III.F.3.a of this Section. Method 5I (40 CFR part 60, appendix A-3) may be useful for affected facilities that operate for less than 1 hour at a time such as (but not limited to) storage bins or enclosed truck or railcar loading stations.

[40 CFR 60.675(e)(3)]

d. In some cases, velocities of exhaust gases from building vents may be too low to measure accurately with the type S pitot tube specified in EPA Method 2 of appendix A-1 of this part [i.e., velocity head <1.3 mm H₂O (0.05 in. H₂O)] and referred to in EPA Method 5 of appendix A-3 of this part. For these conditions, the Permittee shall determine the average gas flow rate produced by the power fans (e.g., from vendor-supplied fan curves) to the building vent. The Permittee shall calculate the average gas velocity at the building vent measurement site using the equation below and use this average velocity in determining and maintaining isokinetic sampling rates:

[40 CFR 60.675(e)(4)]

$$v_e = Q_f / A_e$$

Where,

v_e = Average building vent velocity (feet per minute);

Q_f = Average fan flow rate (cubic feet per minute); and

A_e = Area of building vent and measurement location (square feet)

7. For performance tests involving only Method 9 testing, the Permittee may reduce the 30-day advance notification of performance test in 40 CFR 60.7(a)(6) and 60.8(d) to a 7-day advance notification.

[40 CFR 60.675(g)]

G. Permit Shield

IV. HOT GAS GENERATOR REQUIREMENTS

Compliance with the conditions of this Section shall be deemed compliance with 40 CFR 60.672(a), 60.672(d), 60.672(f), 60.674(c), 60.674(d), 60.675(b), 60.675(c)(2)(i), 60.675(c)(2)(ii), 60.675(e), 60.675(g), 60.676(a), 60.676(b)(1), 60.676(b)(2), 60.676(f), 60.676(i)(1).

[A.A.C. R18-2-325]

IV. HOT GAS GENERATOR REQUIREMENTS

A. Applicability

Section IV applies to operation of the propane-fired hot gas generator.

B. Emission Limitations/Standards

1. Particulate Matter

- a. The Permittee shall not cause to be discharged into the atmosphere from the hot gas generator any plume or effluent greater which exhibits greater than 20 percent opacity.

[A.A.C. R18-2-702.B.3]

- b. For process weight of 60,000 pounds per hour (30 tons per hour) or less, the maximum allowable emissions shall be determined by the following equation:

$$E = 4.10P^{0.67}$$

Where:

E = the maximum allowable particulate emissions rate in pounds-mass per hour.

P = the process weight in tons-mass per hour.

[A.A.C. R18-2-730.A.1.a]

- c. For process weight greater than 60,000 pounds per hour (30 tons per hour), the maximum allowable emissions shall be determined by the following equation:

$$E = 55.0P^{0.11} - 40$$

Where:

E = the maximum allowable particulate emissions rate in pounds-mass per hour.

P = the process weight in tons-mass per hour.

[A.A.C. R18-2-730.A.1.b]

2. Nitrogen Oxides (NO_x)

The Permittee shall not cause or permit the emissions of Nitrogen Oxides expressed as NO₂ at a rate greater than 500 ppm.

[A.A.C. R18-2-730.A.3]

3. Sulfur Dioxide (SO₂)

The Permittee shall not cause or permit the emissions of Sulfur Dioxide at a rate greater than 600 parts per million.

[A.A.C. R18-2-730.A.2]

C. Air Pollution Control

The Permittee shall operate and maintain the flue gas recirculation system in accordance with vendor specifications to control emissions associated with operation of the propane-fired hot gas generator. If vendor specifications are not available, the Permittee shall develop and implement procedures for the proper operation and maintenance of the flue gas recirculation system. A copy of the vendor specifications or the operation and maintenance plan shall be kept on site and made available to ADEQ or the respective AQCD upon request.

[A.A.C. R18-2-306.A.2 and -331.A.3.e]

[Material permit conditions are indicated by underline and italics]

D. Permit Shield

Compliance with the conditions of the conditions of this Section shall be deemed compliance with A.A.C. R18-2-702.B.3, -730.A.1.a, -730.A.1.b, -730.A.2, and -730.A.3.

V. FUGITIVE DUST REQUIREMENTS

A. Applicability

Section V applies to any non-point source of fugitive dust in the facility.

B. Particulate Matter and Opacity

Open Areas, Roadways & Streets, Storage Piles, and Material Handling

1. Emission Limitations/Standards

a. Opacity of emissions from any fugitive dust non-point source shall not be greater than 40%.

[A.A.C. R18-2-614]

b. The Permittee shall employ the following reasonable precautions to prevent excessive amounts of particulate matter from becoming airborne:

- (1) Keep dust and other types of air contaminants to a minimum in an open area where construction operations, repair operations, demolition activities, clearing operations, leveling operations, or any earth moving or excavating activities are taking place, 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;

[A.A.C. R18-2-604.A]

- (2) Keep dust to a minimum from driveways, parking areas, and vacant lots where motor vehicular activity occurs 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;

[A.A.C. R18-2-604.B]

- (3) Keep dust and other particulates to a minimum by employing dust suppressants, temporary paving, detouring, wetting down or by other reasonable means when a roadway or alley is used, repaired, constructed, or reconstructed;

[A.A.C. R18-2-605.A]

- (4) Take reasonable precautions, such as the use of spray bars, wetting agents, dust suppressants, covering the load, and hoods to prevent excessive amounts of particulate matter from becoming airborne when crushing, screening, handling, transporting or conveying of materials or other operations likely to result in significant amounts of airborne dust.

[A.A.C. R18-2-605.B]

- (5) Take reasonable precautions, such as wetting, applying dust suppressants, or covering the load when transporting material likely to give rise to airborne dust. Earth or other material that is deposited by trucking or earth moving equipment shall be removed from paved streets by the person responsible for such deposits.

[A.A.C. R18-2-606]

- (6) Take reasonable precautions such as chemical stabilization, wetting, or covering when organic or inorganic dust producing material is being stacked, piled, or otherwise stored to prevent excessive amounts of particulate matter from becoming airborne;

[A.A.C. R18-2-607.A]

- (7) Operate stacking and reclaiming machinery utilized at storage piles at all times with a minimum fall of material, or with the use of spray bars and wetting agents to prevent excessive amounts of particulate matter from becoming airborne;

[A.A.C. R18-2-607.B]

- (8) Operate mineral tailings piles by taking reasonable precautions to prevent excessive amounts of particulate matter from becoming airborne. Reasonable precautions shall mean wetting, chemical stabilization, revegetation or such other measures as are approved by the Director;

[A.A.C R18-2-608]

- (9) Any other method as proposed by the Permittee and approved by the Director.

[A.A.C. R18-2-306.A.3.c]

2. Air Pollution Control Requirements

Haul Roads and Storage Piles

- a. *Water, or an equivalent control, shall be used to control visible emissions from haul roads and storage piles.*

[A.A.C. R18-2-306.A.2 and -331.A.3.d]

[Material Permit Condition is indicated by underline and italics]

3. Speed Limits on Haul Roads

- a. The Permittee shall post and enforce a speed limit of 25 mph for all vehicles operating on the unpaved roadways on the property.

[A.A.C. R18-2-306.A.2]

- b. Notwithstanding Condition V.B.3.a above, the speed limit for haul trucks shall be 15 mph.

[A.A.C. R18-2-306.A.2]

4. Monitoring and Recordkeeping Requirements

- a. The Permittee shall maintain records of the dates on which any of the activities listed in Condition V.B.1.b above were performed and the control measures that were adopted.

[A.A.C. R18-2-306.A.3.c]

- b. Opacity Monitoring Requirements

On a daily basis, the Permittee shall monitor visible emissions from fugitive sources in accordance with Condition II.A.

[A.A.C. R18-2-306.A.3.c]

- c. Dust Control Recordkeeping Requirements

On a daily basis, the Permittee shall maintain the following records:

- (1) The total gallons of water applied per day;
- (2) Frequency of water application;
- (3) Each day that mining activities did not occur;
- (4) Each day having at least 0.01 inches of precipitation;

VI. OTHER PERIODIC ACTIVITIES

- (5) Each day that follows a significant precipitation event which renders the unpaved roadways sufficiently wet such that watering is unnecessary; and
- (6) The results of visible emissions monitoring as required by Condition V.B.4.b.

[A.A.C. R18-2-306.A.3.c]

C. Permit Shield

Compliance with Section V shall be deemed compliance with A.A.C. R18-2-604, -605, -606, 607, -608, -614, and -804.B.

[A.A.C. R18-2-325]

VI. OTHER PERIODIC ACTIVITIES

A. Abrasive Blasting

1. Particulate Matter and Opacity

a. Emission Limitations/Standards

The Permittee shall not cause or allow sandblasting or other abrasive blasting without minimizing dust emissions to the atmosphere through the use of good modern practices. Good modern practices include:

[A.A.C. R18-2-726]

- (1) Wet blasting;
- (2) Effective enclosures with necessary dust collecting equipment; or
- (3) Any other method approved by the Director.

b. Opacity

The Permittee shall not cause, allow or permit visible emissions from sandblasting or other abrasive blasting operations in excess of 20% opacity.

[A.A.C. R18-2-702.B.3]

2. Monitoring and Recordkeeping Requirement

Each time an abrasive blasting project is conducted, the Permittee shall make a record of the following:

[A.A.C. R18-2-306.A.3.c]

- a. The date the project was conducted;
- b. The duration of the project; and
- c. Type of control measures employed.

3. Permit Shield

Compliance with Condition VI.A.1.a shall be deemed compliance with A.A.C. R18-2-702.B.3 and -726.

[A.A.C.R18-2-325]

B. Use of Paints

1. Volatile Organic Compounds

a. Emission Limitations/Standards

While performing spray painting operations, the Permittee shall comply with the following requirements:

(1) The Permittee shall not conduct or cause to be conducted any spray painting 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 percent of the overspray.

[A.A.C. R18-2-727.A]

(2) The Permittee or their designated contractor shall not either:

(a) Employ, apply, evaporate, or dry any architectural coating containing photochemically reactive solvents for industrial or commercial purposes; or

(b) Thin or dilute any architectural coating with a photochemically reactive solvent.

[A.A.C. R18-2-727.B]

(3) For the purposes of Condition VI.B.1.a(1), a photochemically reactive solvent shall be any solvent with an aggregate of more than 20 percent of its total volume composed of the chemical compounds classified in Condition VI.B.1.a(2), or which exceeds any of the following percentage composition limitations, referred to the total volume of solvent:

[A.A.C. R18-2-727.C]

(a) A combination of the following types of compounds having an olefinic or cyclo-olefinic type of unsaturation-hydrocarbons, alcohols, aldehydes, esters, ethers, or ketones: 5 percent.

(b) A combination of aromatic compounds with eight or more carbon atoms to the molecule except ethylbenzene: 8 percent.

VI. OTHER PERIODIC ACTIVITIES

(c) A combination of ethylbenzene, ketones having branched hydrocarbon structures, trichloroethylene or toluene: 20 percent.

(4) Whenever any organic solvent or any constituent of an organic solvent may be classified from its chemical structure into more than one of the groups of organic compounds described in Condition VI.B.1.a(2), it shall be considered to be a member of the group having the least allowable percent of the total volume of solvents.

[A.A.C. R18-2-727.D]

b. Monitoring and Recordkeeping Requirements

(1) Each time a spray painting project is conducted, the Permittee shall make a record of the following:

(a) The date the project was conducted;

(b) The duration of the project;

(c) Type of control measures employed;

(d) Safety Data Sheets (SDS) for all paints and solvents used in the project; and

(e) The amount of paint consumed during the project.

(2) Architectural coating and spot painting projects shall be exempt from the recordkeeping requirements of Condition VI.B.1.b(1).

[A.A.C. R18-2-306.A.3.c]

c. Permit Shield

Compliance with Condition VI.B.1.a shall be deemed compliance with A.A.C.R18-2-727.

[A.A.C. R18-2-325]

2. Opacity

a. Emission Limitation/Standard

The Permittee shall not cause, allow or permit visible emissions from painting operations in excess of 20% opacity.

[A.A.C. R18-2-702.B.3]

b. Permit Shield

Compliance with Condition VI.B.2.a shall be deemed compliance with A.A.C. R18-2-702.B.3.

[A.A.C. R18-2-325]

C. Demolition/Renovation - Hazardous Air Pollutants

1. Emission Limitation/Standard

The Permittee shall comply with all of the requirements of 40 CFR 61 Subpart M (National Emissions Standards for Hazardous Air Pollutants - Asbestos).

[A.A.C. R18-2-1101.A.12]

2. Monitoring and Recordkeeping Requirement

The Permittee shall keep all required records in a file. The required records shall include the “NESHAP Notification for Renovation and Demolition Activities” form and all supporting documents.

[A.A.C. R18-2-306.A.3.c]

3. Permit Shield

Compliance with the Condition VI.C.1 shall be deemed compliance with A.A.C. R18-2-1101.A.12.

[A.A.C. R18-2-325]

VII. PUBLIC ACCESS RESTRICTIONS

Prior to beginning operations of the mine, the Permittee shall obtain the Director’s approval and implement a Public Access Restriction Plan that includes measures such as fencing, natural topographic barriers, signage, security patrols, and access restrictions to adjacent private property to restrict public access to the Kirkland Mine.

[A.A.C. R18-2-306.A.2]

ATTACHMENT “C”: EQUIPMENT LIST

ATTACHMENT “C”: EQUIPMENT LIST

EQUIPMENT TYPE	MAX. CAPACITY	MAKE	MODEL	SERIAL NUMBER	INSTALLATION/ MFG. DATE	EQUIPMENT ID NUMBER	A.A.C. / NSPS / NESHAP
Mill	100 tph	Confidential	Confidential	Confidential	2020	1631-RM01	NSPS Subpart OOO
Hot Gas Generator (Burner)	16.379 MW	Confidential	Confidential	Confidential	2021	1661-HG01	A.A.C R18-2-730
Product Recovery Baghouse	158,915 acfm	Confidential	Confidential	Confidential	2020	1651-BF01	NSPS Subpart OOO
Storage Silo	5,000 tons	Confidential	Confidential	Confidential	2021	SI-5200	NSPS Subpart OOO
Storage Silo Bin Vent	2,350 cfm	Confidential	Confidential	Confidential	2021	BF-5251	NSPS Subpart OOO
Cartridge Filter Module	1,800 cfm	Confidential	Confidential	Confidential	2021	CF-5260	NSPS Subpart OOO
Storage Silo	5,000 tons	Confidential	Confidential	Confidential	2021	SI-5300	NSPS Subpart OOO
Storage Silo Bin Vent	2,350 cfm	Confidential	Confidential	Confidential	2021	BF-5351	NSPS Subpart OOO
Cartridge Filter Module	1,800 cfm	Confidential	Confidential	Confidential	2021	CF-5360	NSPS Subpart OOO
Mill Feed Breaker Discharge Baghouse	10,000 cfm	Confidential	Confidential	Confidential	2021	1621-DE01	NSPS Subpart OOO
Mill Feed Belt Conveyor	150 tph	Confidential	Confidential	Confidential	2021	1621-BC01	NSPS Subpart OOO
Mill Feed to Rotary Valve Filter	900 cfm	Confidential	Confidential	Confidential	2021	1621-DE02	NSPS Subpart OOO
Mill Rejects Belt Conveyor	150 tph	Confidential	Confidential	Confidential	2021	1641-BC01	NSPS Subpart OOO
Product Storage Bucket Elevator	150 tph	Confidential	Confidential	Confidential	2021	BE-5050	NSPS Subpart OOO



ATTACHMENT “C”: EQUIPMENT LIST

EQUIPMENT TYPE	MAX. CAPACITY	MAKE	MODEL	SERIAL NUMBER	INSTALLATION/ MFG. DATE	EQUIPMENT ID NUMBER	A.A.C. / NSPS / NESHAP
Product Storage Transfer Baghouse	2,350 cfm	Confidential	Confidential	Confidential	2021	BF-5066	NSPS Subpart OOO
Off-Spec Bin	60 tons	Confidential	Confidential	Confidential	2021	BN-5000	NSPS Subpart OOO
Off-Spec Bucket Elevator	150 tph	Confidential	Confidential	Confidential	2021	BE-5020	NSPS Subpart OOO
Off-Spec Bin Vent	900 cfm	Confidential	Confidential	Confidential	2021	BF-5041	NSPS Subpart OOO
Gasoline Storage Tank	1,000 gallons				2021	TK-3201	Insignificant Activity
Diesel Storage Tank	2,000 gallons				2021	TK-3202	Insignificant Activity
Diesel Storage Tank	10,000 gallons				2021	TK-3203	Insignificant Activity
Propane Storage Tank	30,000 gallons				2021	V-3301	Insignificant Activity
Propane Storage Tank	30,000 gallons				2021	V-3302	Insignificant Activity
Propane Storage Tank	30,000 gallons				2021	V-3303	Insignificant Activity