



TECHNICAL REVIEW OF REGISTRATION #64376

I. INTRODUCTION

- A. Registrant: City of Flagstaff
- B. Facility: City of Flagstaff-Wildcat Hill WWTP
- C. Facility Type/Description: Waste water treatment plant
- D. Date Application Received: July 14, 2016
- E. Public Notice Required: Yes

II. EMISSIONS

Table 1: Potential to Emit (in tons per year (tpy))

Pollutant	Uncontrolled PTE	Controlled PTE	Permitting Exemption Threshold
PM_{2.5}	1.09	1.09	5
PM₁₀	1.09	1.09	7.5
NO_x	32.85	32.85	20
CO	12.27	12.27	50
SO₂	7.57	7.57	20
VOC	2.51	2.51	20

III. REGISTRATION GATEKEEPERS

A registration is required if either of the following gatekeepers is triggered:

- A. Does the facility have an uncontrolled potential to emit in excess of the permitting exemption thresholds? (R18-2-302.B.4.a) If so, public notice is required.
- B. Is the facility subject to a New Source Performance Standard (NSPS) or a National Emission Standard for Hazardous Air Pollutants (NESHAP) that is not on the exempted list? (R18-2-302.B.4.b and c) :

IV. APPLICABLE REGULATIONS

The following regulations are applicable to the facility

Table 2: Applicable Regulations

Unit	Regulation	Discussion
Gen1	NESHAP Subpart ZZZZ	The regulation solely by itself does not trigger a requirement for registration.
Gen1	R18-2-719	Standards of performance for existing stationary rotating machinery is applicable to this generator.
Gen2	NSPS Subpart IIII	This regulation is applicable but does not trigger requirement for registration solely by itself
Digester gas Gen	NSPS Subpart JJJJ	The regulation solely by itself does not trigger a requirement for registration.
Boilers	R18-2-306.01, R18-2-331, R18-2-724	Rules applicable to boilers greater than 0.5 MMBtu/Hr
Facility wide	R18-2-730, R18-2-306, R18-2-331	Rules to mitigate odor and hydrogen sulfide

V. NAAQS COMPLIANCE REVIEW

This facility has an uncontrolled PTE above the permitting exemption thresholds but is not a new or modified source. Therefore, ADEQ is not required to perform a National Ambient Air Quality Standard (NAAQS) compliance review to determine if the source may interfere with attainment or maintenance of a NAAQS but ADEQ performed the following qualitative analysis.

The only pollutant that is above the permitting exemption threshold is NO_x which is mainly from two emergency generators. Based on the EPA's March 1, 2011 Memorandum ("Additional Clarification Regarding the Application of Appendix W Modeling Guidance for the 1-hour NO₂ National Ambient Air Quality Standard"), ADEQ allows an exemption for 1-hour NO₂ modeling for emergency generators that operate up to 500 hours per year and no more than 100 hours per year for maintenance and readiness testing purposes. Besides the two emergency generators, digester gas generator emits NO_x at an amount less than 1 pound per hour, which will not cause or contribute to a violation of the NAAQS for 1-hr NO₂. For all other pollutants, the emissions from the facility are less than their responding permitting exemption thresholds. Based on the discussions above, ADEQ determines that the source will not interfere with attainment or maintenance of NAAQS.