TECHNICAL REVIEW AND EVALUATION
OF APPLICATION FOR
AIR QUALITY PERMIT No. 112144

I. INTRODUCTION

This Class II air quality synthetic minor permit is issued to United States Marine Corps Air Station (MCAS), the Permittee, for the continued operation of the Yuma Air Station in Yuma County. The facility is located at Avenue 3E, Yuma, AZ 85369. This permit renews and supersedes Permit No. 87288.

The facility's potential to emit is less than the significant thresholds identified in Arizona Administrative Code (A.A.C.) R18-2-101(132) for all regulated air pollutants. However, a Class II permit was sought by the facility in order to maintain operational flexibility.

A. Company Information

Facility Name: Marine Corps Air Station – Yuma (NAICS Code 481)

Mailing Address: Environmental Department, P.O. Box 99110

Yuma, Arizona 85369

Facility Location: N32° 39′ 40.0″/W114° 35′ 11.0″/213 ft MSL

B. Attainment Classification

The facility is located in Yuma County, and in a non-attainment area for Particulate Matter with an aerodynamic diameter of less than 10 microns (PM_{10}). This area is designated as attainment for all other criteria air pollutants.

II. PROCESS DESCRIPTION

Process Equipment

MCAS Yuma is a complex facility with multiple land uses, processes and activities similar to those found in a small city. The main station consists of an airfield with runways, taxiways, parking aprons, hangars, and operations and training buildings. There are also family and bachelor quarters as well as personnel support facilities such as child care center, youth facility, commissary, exchange, club, bowling alley, theatre, gym, chapel, medical/dental, and social services. A drinking water treatment plant is located along Avenue 3E and adjacent to family housing. The southern portion of the station consists of munitions storage areas, Combat Arms Loading Area (CALA), and out-leased land used for agricultural practices.

Currently, MCAS Yuma is the primary aviation training base in the Marine Corps. MCSA Yuma operates the airport facility as a joint military/civilian airport. The air station is one of the largest single contributors to the economy of Yuma County.

The mission of MCAS Yuma is to support 80 percent of the Marine Corps' air-to-ground aviation training. Each year, the air station hosts approximately 100 transient aviation units assigned to the Atlantic and Pacific Fleet Marine Forces and units from the Navy as well as other U.S. and NATO forces. This training results in an annual transient influx of 41,000 personnel and 600 aircraft at MCAS Yuma. MCAS Yuma has access to 2.8 million acres of aviation and bombing ranges, transient training facilities and good flying weather. It also serves as a base of operations supporting several tenant units.

NAICS Code 481 covers boilers, heaters, internal combustion engines (ICEs), abrasive blast cabinets, degreasers and aqueous parts washers, open burning, booth and non-booth surface coating, remediation systems, gear arrestors, mobile and off-road sources, demolition and renovation, the gasoline dispensing facilities (GDFs) and storage tanks for gasoline and F-24, and other miscellaneous equipment. MCAS Yuma operates 24 hours per day, 365 days per year.

III. COMPLIANCE HISTORY

A. Physical Inspections and Compliance Certification Review

During the five-year permit term that MCSA Yuma operated under Permit No. 87288, this facility had three (3) physical inspections and five (5) compliance certification reviews.

B. Excess Emissions and Permit Deviation Report Review

During the five-year permit term that MCSA Yuma operated under Permit No. 87288, this facility had, one (1) excess emission report review, and thirteen (13) deviation report reviews.

1. Deviation Report Review

   a. Inspection ID: 382366

      On 9/14/2021 the Permittee reported that no EPA Method 9 surveys were performed between August to October 2020 due to a lack of EPA Method 9 certified personnel. Due to Covid-19 no Method 9 training class were available, and Method 9 certification were renewed in October 2020. ADEQ determined no further action was necessary.

   b. Inspection ID: 382368

      On 8/26/2021 during a monthly check of maintenance records, it was discovered that the regularly scheduled maintenance had not been performed for the generators EID #301. 319, 349, 351, 352, 354, and 358. The generators did not have the oil and oil filters changed, as well as hoses and belts were not inspected as well. Inspections were later performed on 7/7/2021. ADEQ determined

that the Permittee returned to compliance with reasonable actions taken in response to supply chain issues that compounded their response time and no escalation was taken.

c. Inspection ID: 390374

On 10/29/2021 it was determined that Equipment ID Number 352 was miss identified in previous 12 Month Rolling Total reports. This discrepancy was detected by conducting a verification of physical assets to what is documented. This error resulted in a recalculation of the 12 Month Rolling Totals. This recalculation resulted in an exceedance of the permit values for Equipment ID Number 352. As of 30 November 2021, the total run time for the unit is 453.8 hours. This figure exceeds the 100 hour maintenance checks and readiness testing of the engine limit in accordance with B.XXII.2.a. The generator was disconnected to prevent inadvertently starting until the ATS is replaced. The oil will be changed prior to putting the unit back into operation. This deviation report was escalated to Compliance on 1/24/2022. On 1/25/2022, the decision was made to not take enforcement action since the Permittee does not have a history of similar permit deviations, and to request additional information from the Permittee to learn more about the circumstances of the deviation and what may be in place to prevent it from reoccurring in the future. the Permittee stated in an email received February 22, 2022 that the unpermitted Generator #353 is under a different NAICS code from the equipment in this permit (this permit NAICS: 481, Generator #353 NAICS: 517), and ADEQ verified that the equipment under NAICS Code 517 at this facility were determined by ADEQ in 2016 to not require a permit or registration (LTF #64024)

d. Inspection ID: 395410

On 2/16/2022 the Permittee reported that they were 30 days late on completing the annual maintenance for Emergency ICE #349. The Permittee did have a similar permit deviation reported 9/14/2021 for late engine maintenance for several engines, including the same one that had late maintenance for this permit deviation. A discussion was had with ACU, and the decision was made not to take further action since the corrective actions seemed sufficient.

e. Inspection ID: 399612

On June 3, 2022 the Permittee reported that they were 23 days late on completing maintenance for Emergency ICE #301. The cause of the deviation was attributed to minimal maintenance staffing and inconsistency of the supply chain system in delivering required parts for the maintenance. This permit deviation was escalated to air compliance unit on June 8, 2022 because it was the third

deviation report received from this facility in the prior 12 months for late engine maintenance. One June 9, 2022 a NOC (Case ID #: 205430) was sent to the facility. The facility corrected the deficiencies as requested, and ADEQ closed the NOC on June 17, 2022.

f. Inspection ID: 406834

On 6/17/2022 the Permittee discovered that Emergency ICE #352 operated greater than 100 hours for the 12 month rolling total period due to a mechanical failure of the automatic transfer switch (ATS). Upon discovery of the occurrence, the maintenance technician disconnected the batteries for the engine. ADEQ determined that there was an adequate response with reasonable follow up actions and no further actions taken.

g. Inspection ID: 406836

On 7/29/20222 the Permittee discovered that the monthly instantaneous survey of visible emissions for gear arrestors were not completed for the month of July. Due to a revision of the Airfield Safety Waiver at MCAS, Yuma by the Dept. of the Navy, NAVAIR, the monthly Method 9 visible emissions surveys for the arresting gear engines were placed on hold until a re-evaluation and new Airfield Safety Waiver could be issued, and approved for the Environmental Staff to travel on the airfield runways. ADEQ reviewed the documentation and no further actions were taken.

h. Inspection ID: 408442

On 9/13/2022 the Permittee discovered that Emergency ICE #350 operated for a total of 116.6 hours for the 12 month rolling total period due to a mechanical failure of the automatic transfer switch (ATS). Upon discovery of the occurrence, the maintenance technician disconnected the batteries for the engine. ADEQ determined that there was an adequate response with reasonable follow up actions and no further actions taken.

i. Inspection ID: 412385

On 7/31/2022 during a monthly check of maintenance records, it was discovered that the regularly scheduled maintenance had not been performed for the ICE #359. ADEQ determined that the Permittee returned to compliance with reasonable actions taken in response to supply chain issues that compounded their response time and no escalation was taken.

j. Inspection ID: 412387

On 7/31/2022 during a monthly check of maintenance records, it was discovered that the regularly scheduled maintenance had not been performed for the ICE #358. ADEQ determined that the Permittee returned to compliance with reasonable actions taken in response to supply chain issues that compounded their response time and no escalation was taken.

k. Inspection ID: 419196

On 1/20/2023 the Permittee discovered that the monthly instantaneous survey of visible emissions for three gear arrestors (EID #'s 437 and 438) were not completed for the month of January. It was believed that the gear arrestors were down and not operational. Prior conversations with ADEQ indicated that if the gear arrestors were operated for less than 1 hour the survey did not need to be conducted. Both gear arrestors were recorded for a total run time of an hour or more upon discovery. No further actions were taken by ADEQ.

l. Inspection ID: 428606

On 7/7/2023 the Permittee discovered that the monthly instantaneous survey of visible emissions for three gear arrestors (EID #'s 433, and 434) were not completed for the month of June. It was believed that the gear arrestors were down and not operational. Prior conversations with ADEQ indicated that if the gear arrestors were operated for less than 1 hour the survey did not need to be conducted. Both gear arrestors were recorded for a total run time of an hour or more upon discovery. No further actions were taken by ADEQ.

m. Inspection ID: 434729

On 9/25/2023 the Permittee discovered that the annual oil change for generator with EID 359 was not completed as scheduled on 9/12/2023. Upon discussion with the owners, it was determined that the oil change would not be able to be performed until 10/5/2023 due to part availability ADEQ determined that the equipment was not operational at the time of operational maintenance scheduling, and that once repaired the oil change was quickly completed. No further action was taken.

n. Inspection ID: 434929

On 10/10/2023 the Permittee discovered that Emergency ICE #343 operated for a total of 116.4 hours for the 12 month rolling total period due to a mechanical failure of the automatic transfer switch (ATS). Upon discovery of the occurrence, the maintenance technician disconnected the batteries for the engine. ADEQ

determined that there was an adequate response with reasonable follow up actions and no further actions taken.

o. Inspection ID: 440435

On 1/10/2024 the Permittee discovered that the monthly instantaneous survey of visible emissions for three gear arrestors (EID 437, 438, and 430) were not completed for the month of December. It was believed that the gear arrestors were down and not operational. Prior conversations with ADEQ indicated that if the gear arrestors were operated for less than 1 hour the survey did not need to be conducted. Both gear arrestors were recorded for a total run time of an hour or more upon discovery. No further actions were taken by ADEQ.

p. Inspection ID: 443205

On 3/6/2024 the Permittee discovered that Generators with permit ID's 342, 349, and 354 were scheduled for annual maintenance to include an oil and oil filter change, air cleaner inspection, and hose and belt inspection during the month of March. The maintenance was not completed and was not likely to be able to be completed within the month of March due to staffing issues. ADEQ determined that the deviations were not likely to impact emissions and no further action was taken.

q. Inspection ID: 447797

On 4/8/2024 the Permittee discovered that Generators with permit ID's 302, 338, 339, 343, 351, 352 were scheduled for annual maintenance to include an oil and oil filter change, air cleaner inspection, and hose and belt inspection during the month of March. The maintenance was not completed and was not likely to be able to be completed within the month of March due to staffing issues. ADEQ determined that the deviations were not likely to impact emissions and no further action was taken.

r. Inspection ID: 455281

On 10/2/2024 the Permittee discovered that the monthly instantaneous survey of visible emissions for gear arrestor 3 starboard side (EID 430) was not completed for the month of September. The monthly instantaneous survey of visible emissions was conducted on September 4, 2024. It was believed that the gear arrestor (EID 430) was down and not operational. Prior conversations with ADEQ indicated that if the gear arrestors were operated for less than 1 hour the survey did not need to be conducted. The gear arrestor was recorded for a total run time of

an hour or more upon discovery. No further actions were taken by ADEQ.

s. Inspection ID: 468631

On 4/10/2025 the Permittee discovered that the monthly instantaneous survey of visible emissions for gear arrestor 3 port side and starboard side (EID 429 and 430) was not completed for the month of March. The monthly instantaneous surveys of visible emissions were conducted on March 5, 2025. It was believed that the gear arrestors (EID 429 and 430) were down and not operational. Prior conversations with ADEQ indicated that if the gear arrestors were operated for less than 1 hour the survey did not need to be conducted. Both gear arrestors were recorded for a total run time of an hour or more upon discovery. No further actions were taken by ADEQ.

C. Formal Enforcement

1. Case Number 205430

A Notice of Correction (NOC) was issued to MCAS – Yuma on June 9, 2022, for a violation based on an inspection conducted on June 3, 2022 (Inspection ID: 399612). The violation was:

On June 3, 2022 the Permittee reported that they were 23 days late on completing maintenance for Emergency ICE #301. The cause of the deviation was attributed to minimal maintenance staffing and inconsistency of the supply chain system in delivering required parts for the maintenance. This permit deviation was escalated to air compliance unit on June 8, 2022 because it was the third deviation report received from this facility in the prior 12 months for late engine maintenance.

The facility responded on June 9, 2022. Compliance was documented and the NOC was closed on June 17, 2022.

2. Case Number 208178

A Notice of Correction (NOC) was issued to MCAS – Yuma on October 24, 2022, for a violation based on an inspection conducted on October 11, 2022 (Inspection ID: 408442). The violation was:

The Permittee submitted a permit deviation for the Emergency ICE #350. On September 13, 2022, the Permittee discovered that Emergency ICE #350 operated for a total of 116.6 hours for the 12 month rolling total period due to a mechanical failure of the automatic transfer switch (ATS). Upon discovery of the occurrence, the maintenance technician disconnected the batteries for the engine. The Permittee reported this permit deviation to ADEQ on September 16, 2022.

The facility responded on November 3, 2022. Compliance was documented and the NOC was closed on November 4, 2022.

IV. EMISSIONS

The potential-to-emit (PTE) is calculated based on EPA AP-42, Air Emission Factor Guide to Air Force Stationary Sources, and the Navy's Aircraft Environmental Support Office (AESO) memorandum Report. The facility has a potential-to-emit (PTE) less than the significant thresholds for all regulated pollutants, but opted to apply for a Class II permit. The facility's PTE is provided in Table 2 below:

Table 1: Potential to Emit (tpy)

Pollutant	Previous PTE	Change in PTE	Current PTE	Permitting Exemption Threshold	Significant Thresholds	Minor NSR Triggered?
NO_X	58.28	-18.88	39.40	20	40	No
PM_{10}	8.54	-4.77	3.77	7.5	15	No
$PM_{2.5}$	8.44	-4.75	3.69	5	10	No
CO	31.94	-13.99	17.95	50	100	No
SO_2	0.7	-0.63	0.07	20	40	No
VOC	26.94	0.96	27.90	20	40	No
Pb	0.05	-0.02	0.03	0.3	0.6	No
HAPs	7.83	-3.61	4.22	N/A	10 (single)/ 25 (combined)	No

The large changes in all regulated pollutants except VOCs in this renewal permit from the last permit is from the removal of the Jet Engine Test Cells and Welders. The increase in VOC emissions is due to the addition of the Gasoline Dispensing Facility and the Fuel Tanks.

I. APPLICABLE REGULATIONS

Table 3 identifies applicable regulations and verification as to why that standard applies. The table also contains a discussion of any regulations the emission unit is exempt from.

Table 2: Applicable Regulations

Unit	Control Device	Rule	Discussion
Boilers, Heaters, Furnaces, and Infrared Heaters	N/A	A.A.C. R18-2-724	NSPS Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units is applicable to each steam generating unit for which construction, modification, or reconstruction commenced after June 9, 1989 and has a maximum design heat input capacity between 10 and 100 MMBtu/hr. The capacity of these boilers and heaters is below 10 MMBtu/hour. Hence, NSPS is not applicable. Therefore, A.A.C. R 18-2-724 - Standards of Performance for Fossil-fuel Fired Industrial and Commercial Equipment is applicable. NESHAP Subpart JJJJJJ defines 'Gas-fired boiler' as any boiler that burns gaseous fuels and burns liquid fuel only during periods of gas curtailment, gas supply emergencies, or periodic testing on liquid fuel. The boilers at MCAS shall be using natural gas only. The hot water heaters at the facility are below 120 US Gallons capacity. Therefore, these are exempt from the requirements of NESHAP Subpart JJJJJJ.

Unit	Control Device	Rule	Discussion
Internal Combustion Engines, pre-2007	N/A	A. A. C. R18-2-719 NESHAP Subpart ZZZZ	Applicability date for NSPS Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines is April 2006 for compression ignition ICEs. The NSPS is not applicable since these ICEs are manufactured before 2006. Therefore, Standards of Performance for Existing Stationary Rotating Machinery are applicable. In accordance with 40 CFR 63, Subpart ZZZZ the ICEs identified here are 'existing emergency engines' at an area source. Therefore, requirements of NESHAP Subpart ZZZZ are applicable.
Internal Combustion Engines, 2007 and newer	N/A	NSPS Subpart IIII NESHAP Subpart ZZZZ	NSPS Subpart IIII is applicable to ICEs manufactured after April, 2006. This Subpart is applicable to these ICEs. These are 'New Engines' under NESHAP Subpart ZZZZ. Requirements of NESHAP ZZZZ are met by their meeting the requirements of NSPS Subpart IIII.
Gear Arrestor Engines, 2025	N/A	NSPS Subpart IIII NESHAP Subpart ZZZZ	NSPS Subpart IIII is applicable to ICEs manufactured after April, 2006. This Subpart is applicable to these ICEs. These are 'New Engines' under NESHAP Subpart ZZZZ. Requirements of NESHAP ZZZZ are met by their meeting the requirements of NSPS Subpart IIII.
Parts Washer	N/A	A.A.C. R18-2-730	This standard for unclassified equipment applies to engine test cells, welding, and parts washer.

Unit	Control Device	Rule	Discussion
Gasoline Dispensing Facility Gasoline Storage Tanks	N/A	NESHAP 40 CFR 63 Subpart CCCCCC A.A.C. R18-2-710	National Emission Standards for Hazardous Air Pollutants (NESHAP) is applicable to Gasoline Dispensing Facilities. This standard applies to all petroleum liquid storage tanks.
F24 Storage Tanks (1955, Pre-2001, 2007)	N/A	New Source Performance Standard, Subpart Kb A.A.C. R18-2-730	Recordkeeping requirements for storage vessels of liquids with <3.5 kPa vapor pressure meets the requirements of NSPS Subpart Kb. F24 storage tanks that are not subject to Subpart Kb are subject to the requirements of Arizona Administrative Code regulation for Unclassified Sources.
Fugitive dust sources	Water Trucks, Dust Suppressants	A.A.C. R18-2 Article 6 A.A.C. R18-2-702	These standards are applicable to all fugitive dust sources at the facility.
Abrasive Blasting	Wet blasting; Dust collecting equipment; Other approved methods	A.A.C. R-18-2-702 A.A.C. R-18-2-726	These standards are applicable to any abrasive blasting operation.
Spray Painting	Enclosures	A.A.C. R18-2-702 A.A.C. R-18-2-727	These standards are applicable to any spray painting operation.
Demolition/Renovation	N/A	A.A.C. R18-2-1101.A.12	This standard is applicable to any asbestos related demolition or renovation operations.

II. PREVIOUS PERMIT REVISIONS AND CONDITIONS

Changes to Current Renewal

Table 5 addresses the changes made to the sections and conditions from Permit No. 87288:

Table 3: Previous Permit Conditions

Section No.	Determination			Comments
	Added	Revised	Deleted	
Att. “A”		X		General Provisions: Revised to represent the most recent template language
Att. “B” Section I		X		Facility Wide Requirements: Revised to represent the most recent template language
Att. “B” Section III		X		Emergency Internal Combustion Engine (ICE) Requirements: Minor revisions to made to language in permit conditions and to remove Gear Arrestor Engines.
Att. “B” Section IV	X			Non-Emergency Internal Combustion Engine (ICE) Requirements: Added to reflect the change in engine type for replacement Gear Arrestor Engines.
Att. “B” Section V		X		Test Cells, Welding, and Parts Washer: Revised to remove Test Cells and Welders because they were removed in the current permit renewal. Revised to remove Particulate Matter, Sulfur Dioxide and Nitrogen Oxides sections as Parts Washers are aqueous.
Att. “B” Section VI	X			F24 Fuel Storage Tanks: Added because of the inclusion of the F24 Fuel tanks to the current permit renewal.
Att. “B” Section VII	X			Gasoline and E85 Storage Tanks, and Gasoline Dispensing Facility: Added because of the inclusion of the Gasoline and E85 Storage tanks, and Gasoline Dispensing Facility to the current permit renewal.
Att. “B” Section IX & X	X			Other Periodic Activities: Revised to represent the most recent template language.
Att. “C”		X		Equipment List: Revised to reflect the most recent equipment operating at the facility and to include equipment information provided.

III. MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS

Table 6 contains an inclusive but not an exhaustive list of the monitoring, recordkeeping and reporting requirements prescribed by the air quality permit. The table below is intended to provide insight to the public for how the facility is required to demonstrate compliance with the emission limits in the permit. Records are required be kept for a minimum of 5 years as outlined in Section XII of Attachment “A” of the permit.

Table 4: Permit No. 112144

Emission Unit	Pollutant	Emission Limit	Monitoring Requirements	Recordkeeping Requirements	Reporting Requirements
Boilers Heaters, Furnaces, and Infrared Heaters	PM	Not exceeding $E = 1.02\ Q^{0.769}$ where E = the maximum particulate emission rate in pounds-mass per hour, and Q = the heat input in million Btu per hour. Opacity ≤ 15%	EPA Reference Method 9 observation	Keep records of fuel supplier certifications	Report all six-minute periods in which the opacity of any plume or effluent from the equipment exceeds 15 percent
Emergency ICEs and Gear Arrestor Engines	For all engines, operating hours	Not operate more than the hours listed in the Equipment List, Attachment "C" in any rolling 12-month period	N/A	Keep records of the rolling 12-month total hours of operation of each engine to demonstrate compliance with the hourly limitation	N/A
	For engines not subject to NSPS	Not exceeding $E = 1.02\ Q^{0.769}$ where E = the maximum particulate emission rate in pounds-mass	Conduct monthly survey of visible emissions	Maintain a record of the daily lower heating value of the fuel fired in the engines	N/A

Emission Unit	Pollutant	Emission Limit	Monitoring Requirements	Recordkeeping Requirements	Reporting Requirements
	PM	per hour, and Q = the heat input in million Btu per hour. Opacity ≤ 40% for any period greater than 10 consecutive seconds			
	For engines not subject to NSPS SO_2	≤ 1.0 lb/MMBtu	N/A	Keep records of fuel supplier certification	N/A
	For engines subject to NSPS Subpart IIII	Table 1 and 4 40 CFR Part 60 Subpart IIII, New Non-road engines in 40 CFR 60.4202	For engines 2007 and later, purchase an engine certified to the emission standards in 40 CFR 60.4205(b). For modified or reconstructed engines, purchase an engine certified to the emission standards in 40 CFR 60.4204(e) or 4205(f); or conduct	Maintain a copy of engine certification or other documentation demonstrating that the engine complies with the applicable standards. Record the time of operation of the engine and the reason the engine was in operation during that time. Keep records of fuel supplier specifications	Submit performance test reports if applicable.

Emission Unit	Pollutant	Emission Limit	Monitoring Requirements	Recordkeeping Requirements	Reporting Requirements
			an initial performance test.		
	For engines subject to NESHAP Subpart ZZZZ	N/A	N/A	Keep records of the hours of operation of the emergency ICE that is recorded through the non-resettable hour meter. Keep records of the parameters that are analyzed and the results of the oil analysis, if any, and the oil changes for the engine. For existing emergency ICE subject to management practices in Attachment "B" Condition III.E.2.e, keep records of the maintenance conducted on the ICE	Submit all reports required along with the annual compliance certification.
Parts Washers	PM	For sources having a process weight rate of 60,000 pounds per hour (30 tons per hour) or less, PM not exceed $E = 4.10\ P^{0.67}$; and for sources having a process weight rate of 60,000 pounds per		N/A	N/A

Emission Unit	Pollutant	Emission Limit	Monitoring Requirements	Recordkeeping Requirements	Reporting Requirements
		hour (30 tons per hour) or less, not exceed E = 55.0 P $^{0.11}$- 40, where E = the maximum allowable particulate emissions rate in pounds-mass per hour and P = the process weight rate in tons-mass per hour. Opacity ≤ 20%	Conduct monthly visible observation survey.		
Facility-Wide Hazardous Air Pollutant Requirements	HAPs	Total HAPs ≤ 22.5 tons in any 12-month rolling period; single HAP ≤ 9 tons tons in any 12-month rolling period	N/A	Record information of the HAP material used; keep records of the daily usage of all solvents, paints, or of other HAP-containing materials; on a monthly basis, determine the facility-wide total of HAP-containing materials used; on an annual basis, perform mass balances for all HAP-containing materials.	Submit a summary of all the records required to the Director as part of the annual compliance certifications
Fugitive Dust	PM	40% Opacity	A Method 9 observer is	Record of the dates and types of dust control	N/A

Emission Unit	Pollutant	Emission Limit	Monitoring Requirements	Recordkeeping Requirements	Reporting Requirements
			required to conduct a monthly survey of visible emissions.	measures employed, and if applicable, the results of any Method 9 observations, and any corrective action taken to lower the opacity of any excess emissions.	
Abrasive Blasting	PM	20% Opacity	N/A	Record the date, duration and pollution control measures of any abrasive blasting project.	N/A
Spray Painting	VOC	20% Opacity Control 96% of the overspray	N/A	Maintain records of the date, duration, quantity of paint used, any applicable MSDS, and pollution control measures of any spray painting project.	N/A
Demolition/ Renovation	Asbestos	N/A	N/A	Maintain records of all asbestos related demolition or renovation projects including the "NESHAP Notification for Renovation and Demolition Activities" form and all supporting documents	N/A

IV. LEARNING SITE EVALUTATION

In accordance with ADEQ's Environmental Permits and Approvals near Learning Sites Policy, the Department is required to conduct an evaluation to determine if any nearby learning sites would be adversely impacted by the facility. Learning sites consist of all existing public schools, charter schools and private schools in the K-12 level, and all planned sites for schools approved by the Arizona School Facilities Board. The learning sites policy was established to ensure that the protection of children at learning sites is considered before a permit approval is issued by ADEQ.

Since this renewal did not increase emissions, a learning site re-evaluation does not need to be conducted.

V. LIST OF ABBREVIATIONS

A.A.C. ..... Arizona Administrative Code
ADEQ ..... Arizona Department of Environmental Quality
MMBtu/hr ..... Million British Thermal Units per Hour
CARB ..... California Air Resources Board
CFR ..... Code of Federal Regulations
CO ..... Carbon Monoxide
EPA ..... Environmental Protection Agency
ft ..... Feet
HAP ..... Hazardous Air Pollutant
hp ..... Horsepower
hr ..... Hour
IC ..... Internal Combustion
kW ..... Kilowatt
lb ..... Pound
NAICS ..... North American Industry Classification System
NATO ..... North Atlantic Treaty Organization
NO_X ..... Nitrogen Oxides
NSPS ..... New Source Performance Standards
NESHAP ..... National Emission Standards for Hazardous Air Pollutants
Pb ..... Lead
PM ..... Particulate Matter
PM_{10} ..... Particulate Matter less than 10 µm nominal aerodynamic diameter
$PM_{2.5}$ ..... Particulate Matter less than 2.5 µm nominal aerodynamic diameter
PTE ..... Potential to Emit
SO_2 ..... Sulfur Dioxide Significant Impact Levels
TPY ..... Tons per Year
VOC ..... Volatile Organic Compound
yr ..... Year