

## CLASS II AIR QUALITY PERMIT

### DRAFT PERMIT No.100588

**PERMITTEE:** Nestle Purina PetCare Company  
**FACILITY:** Nestle Purina PetCare  
**PLACE ID:** 2318  
**DATE ISSUED:** Date Pending  
**EXPIRY DATE:** Date Pending

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### SUMMARY

This Class II synthetic minor air quality permit is issued to Nestle Purina PetCare Company, the Permittee, for the continued operation of its pet food manufacturing facility. The facility is located at 4700 E. Nestle Purina Ave. in Flagstaff, Arizona 86004. This permit renews and supersedes Permit No. 74605.

The facility's uncontrolled emissions for particulate matter with an aerodynamic diameter equal to or less than 10 micrometers (PM<sub>10</sub>) are greater than the major source threshold as identified in the Arizona Administrative Code (A.A.C. R18-2-401.13). However, the facility's controlled emissions for PM<sub>10</sub> using cyclones and dust collectors are less than the major source threshold identified in A.A.C. R18-2-401.13. Therefore, a Class II synthetic minor permit is required for this facility in accordance with A.A.C. R18-2-302.B.2.a.

This permit is issued in accordance with Arizona Revised Statutes (A.R.S.) § 49-426. It contains requirements from Title 18, Chapter 2 of the A.A.C. and Title 40 of the Code of Federal Regulations (CFR). 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 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.  
[A.R.S. § 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

IV. POSTING OF PERMIT

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

[A.A.C. R18-2-315.A.1]

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

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

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 A.R.S. § 49-426(E) and A.A.C. R18-2-326.

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

**VI. EMISSIONS 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]

C. The Permittee shall submit to the Director an amendment to an emissions inventory questionnaire, containing the documentation required by A.A.C. R18-2-327.A.3, whenever the Permittee discovers or receives notice, within two years of the original submittal, that incorrect or insufficient information was submitted to the Director by a previous emissions inventory questionnaire. The amendment shall be submitted to the Director within 30 days of discovery or receipt of notice. If the incorrect or insufficient information resulted in an incorrect annual emissions fee, the Director shall require that additional payment be made or shall apply an amount as a credit to a future annual emissions fee. The submittal of an amendment shall not subject the Permittee to an enforcement action or a civil or criminal

VII. COMPLIANCE CERTIFICATION

penalty if the original submittal of incorrect or insufficient information was not due to willful neglect.

[A.A.C. R18-2-327.A.4]

**VII. COMPLIANCE CERTIFICATION**

A. The Permittee shall submit a compliance certification to the Director annually which describes the compliance status of the source with respect to each permit condition. The certification shall be submitted no later than September 15th, and shall report the compliance status of the source during the period between August 1st of the previous year and July 31st 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. 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 time line specified in 40 CFR Part 68.

[40 CFR Part 68]

**XII. EXCESS EMISSIONS AND PERMIT DEVIATIONS 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.

[A.A.C. R18-2-310.01.A.1]

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



XIII. RECORDKEEPING REQUIREMENTS

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 (2) working days of discovery of the deviation is prompt for deviations of permit conditions identified by Condition I.D.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 annually, concurrent with the annual compliance certifications required in Section VII, 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]

**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]

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 Condition XVI.B, 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. The following changes may be made if the source keeps on site records of the changes according to Condition XVI.H below:

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

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

[A.A.C. R18-2-317.02.B.1]

2. Changing process equipment, operating procedures, or making any other physical change if the permit requires the change to be logged;  
[A.A.C. R18-2-317.02.B.2]
  3. Engaging in any new insignificant activity listed in A.A.C. R18-2-101.68 but not listed in the permit;  
[A.A.C. R18-2-317.02.B.3]
  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  
[A.A.C. R18-2-317.02.B.4]
  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.  
[A.A.C. R18-2-317.02.B.5]
- C. 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: seven days. The Director may require verification of efficiency of the new equipment by performance tests;  
[A.A.C. R18-2-317.02.C.1]
  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: seven days;  
[A.A.C. R18-2-317.02.C.2]
  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;  
[A.A.C. R18-2-317.02.C.3]
  4. A change that would trigger an applicable requirement that already exists in the permit: 30 days unless otherwise required by the applicable requirement;  
[A.A.C. R18-2-317.02.C.4]
  5. A change that amounts to reconstruction of the source or an affected facility: seven days. For 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

[A.A.C. R18-2-317.02.C.5]

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,  
[A.A.C. R18-2-317.02.D.1]
2. A description of the change,  
[A.A.C. R18-2-317.02.D.2]
3. Any change in emissions of regulated air pollutants, and  
[A.A.C. R18-2-317.02.D.3]
4. Any permit term or condition that is no longer applicable as a result of the change.  
[A.A.C. R18-2-317.02.D.4]

- E. 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]

- F. 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 Permittee 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]

- G. 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]

- H. Logging Requirements

[Arizona Administrative Code, Appendix 3]

XVII. TESTING REQUIREMENTS

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 provisions of Condition XVI.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

XVII. TESTING REQUIREMENTS

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. R18-2-312.F]

G. Report of Final Test Results

A written report of the results of performance tests conducted pursuant to 40 CFR 60 and 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**

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.C of this Attachment and any facility changes without a permit revision pursuant to Section XVI 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. FACILITY-WIDE REQUIREMENTS**

**A. Applicability**

This Section is applicable to all facility-wide equipment.

**B. Opacity**

**1. Instantaneous Surveys and Six-Minute Observations**

**a. Instantaneous Surveys**

Any instantaneous survey required by this permit shall be determined by either option listed in Conditions I.B.1.a(1) and (2):

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

**(1) Alternative Method ALT-082 (Digital Camera Operating Technique)**

**(a)** The Permittee, or Permittee representative, shall be certified in the use of Alternative Method ALT-082.

**(b)** The results of all instantaneous surveys and six-minute observations shall be obtained within 2 hours.

**(2) EPA Reference Method 9 Certified Observer.**

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

**b. Six-Minute Observations**

Any six-minute observation required by this permit shall be determined by either option listed in Conditions I.B.1.b(1) and (2):

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

**(1) Alternative Method ALT-082 (Digital Camera Operating Technique)**

**(a)** The Permittee, or Permittee representative, shall be certified in the use of Alternative Method ALT-082.

**(b)** The results of all instantaneous surveys and six-minute observations shall be obtained within 2 hours.

**(2) EPA Reference Method 9.**

**c.** The Permittee shall have on site or on call a person certified in EPA Reference Method 9 unless all six-minute Method 9 observations required by this permit are conducted as a six-minute Alternative Method ALT-082

I. FACILITY-WIDE REQUIREMENTS

(Digital Camera Operating Technique) and all instantaneous visual surveys required by this permit are conducted as an instantaneous ALT-082 camera survey. Any six-minute Method 9 observation required by this permit can be conducted as a six-minute Alternative Method ALT-082 and any instantaneous visual survey required by this permit can be conducted as an instantaneous ALT-082 camera survey.

[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.
  - (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.

C. Stack Requirements

[A.A.C. R18-2-306.A.2]  
[State Enforceable Only]

I. FACILITY-WIDE REQUIREMENTS

1. The Manifolded extrusion unit exhaust and Dryer #3 exhaust, EP 39 (previously EP15, EP16, EP17, EP18, EP 28, and EP8) shall be oriented in such a manner that it exhausts vertically upward.
2. The Manifolded extrusion unit exhaust, EP 39, shall have a minimum exhaust release height of 197 feet and a stack diameter of 46 inches.
3. The Manifolded extrusion unit exhaust, EP 39, shall be operated in an open loop configuration at all times.
4. The Manifolded extrusion unit exhaust, EP 39, shall have a maximum airflow rate of 62,100 actual cubic feet per minute.

D. Recordkeeping and 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. Conditions III.B.2.a(1) through III.B.2.a(12) of Attachment “B”; and
  - b. Condition III.B.2.b of Attachment “B”.
2. The Permittee shall submit reports of all monitoring activities required in Attachment “B” along with the annual compliance certification required by Section VII of Attachment “A.”  
[A.A.C. R18-2-306.A.5.a]

E. Permit Shield

Nothing in this permit shall alter or affect the following:

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

1. The provisions of Section 303 of the Clean Air Act, including the authority of the Administrator under that Section;
2. The liability of the facility for any violation of applicable requirements prior to or at the time of permit issuance;
3. The ability of the EPA Administrator or the Director to obtain information from the facility pursuant to Section 114 of the Act, or any provision of state law; and
4. The authority of the Director to require compliance with new applicable requirements adopted after the permit is issued.

II. BOILERS

II. BOILERS

A. Applicability

This Section is applicable to the boilers identified in Attachment “C”.

B. Fuel Requirements

1. The Permittee shall only burn fuel oil or natural gas in the boilers.

[A.A.C. R18-2-306.01.A and 331.A.3.a]

[Material Permit Conditions are indicated by underlines and italics]

2. The term “fuel oil” used herein shall refer to low sulfur distillate fuel oil containing less than 0.90 percent by weight of sulfur.

[A.A.C. R18-2-701.23]

3. Hours of Operation Limitation

When firing fuel oil, the Permittee shall limit the hours of operation for each boiler to no more than 48 hours in any 12-month rolling period outside of a gas supply or curtailment emergency.

[A.A.C. R18-2-306.01.A and 331.A.3.a]

[Material Permit Conditions are indicated by underlines and italics]

4. Monitoring, Recordkeeping, and Reporting Requirements

The Permittee shall maintain on-site monthly records of boiler operating hours where fuel oil was combusted. These records shall be made available to ADEQ upon request.

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

C. Particulate Matter and Opacity

1. Emissions Limitations and Standards

- a. The Permittee shall not cause, allow or permit the emission of particulate matter, caused by combustion of fuel, from the boilers into the atmosphere in excess of the amounts calculated by the following equation:

$$E = 1.02Q^{0.769}$$

Where:

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

Q = the heat input in million Btu per hour.

[A.A.C. R18-2-724.C.1]

II. BOILERS

- b. For purposes of this Subsection, the heat input shall be the aggregate heat content of all fuels whose products of combustion pass through a stack or other outlet. The total heat input of all fuel-burning shall be used for determining the maximum allowable amount of particulate matter which may be emitted.

[A.A.C. R18-2-724.B]

- c. The Permittee shall not cause, allow or permit to be emitted into the atmosphere any plume or effluent from the boilers that exceeds 15 percent opacity as per Condition I.B.2 of Attachment "B".

[A.A.C. R18-2-724.J]

2. Monitoring, Recordkeeping, and Reporting Requirements

- a. The Permittee shall keep records of fuel supplier certifications. The certification shall contain information regarding the name of fuel supplier and lower heating value of the fuel. These records shall be made available to ADEQ upon request.

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

- b. The Permittee shall conduct monthly opacity monitoring from the stack of each boiler when in operation as per Condition I.B.2 of Attachment "B".

[A.A.C. R18-2-306.A.3.c, -306.A.4.a and 306.A.5]

3. Permit Shield

Compliance with the Conditions of this Subsection shall be deemed compliance with A.A.C. R18-2-724.B, A.A.C R18-2-724.C.1 and A.A.C R18-2-724.J.

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

D. Sulfur Dioxide

1. Emissions Limitation and Standard

The Permittee shall not cause, allow or permit the emissions of more than 1.0 pound of sulfur dioxide per million Btu heat input from each boiler.

[A.A.C. R18-2-724.E]

2. Fuel Limitation

*During times of gas supply or curtailment emergencies, the Permittee shall limit the combined amount of fuel oil combusted in each boiler to no more than 1,390,000 gallons in a 12-month rolling period.*

[A.A.C. R18-2-306.01.A and 331.A.3.a]

[Material Permit Conditions are indicated by underlines and italics]

3. Monitoring and Recordkeeping Requirement

The Permittee shall maintain on-site monthly records in gallons of fuel oil combusted for each boiler. At the end of each month, the Permittee shall calculate

III. UNCLASSIFIED SOURCES

the 12-month rolling total in gallons of fuel oil combusted for each boiler. These records shall be made available to ADEQ upon request.

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

4. Permit Shield

Compliance with the Conditions of this Subsection shall be deemed compliance with A.A.C. R18-2-724.E.

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

**III. UNCLASSIFIED SOURCES**

**A. Applicability**

This Section is applicable to the Truck & Rail Receiving, Grinding Aspiration, Product & By-Product Dryers, Live Bottom Bin Aspiration, Dryer Legs Aspiration, LBB Rotex Aspiration, 5 Extrusion Unit Conveyance Cyclones, FP Cooler System Cyclones, Odd Pound Storage Silo Bin Vents, Mixed Meal Weigh Belt Feeder, Cyclones 31a, 31b, 32a, 32b, 34, 35, 36, & 37, Hammermills, Dryer Conveyance, Merrick Batching and Odd Pound Transporter.

**B. Particulate Matter and Opacity**

1. Emissions Limitations and Standards

a. The Permittee shall not cause, allow or permit the emission of particulate matter from any process equipment mentioned above, caused by the combustion of fuel, in excess of the amount calculated by the following equation:

(1) For process sources having a process weight rate 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 emission rate in pounds-mass per hour.

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

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

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

III. UNCLASSIFIED SOURCES

Where:

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

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

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

- b. The Permittee shall not cause, allow or permit to be emitted into the atmosphere from any process equipment mentioned above, smoke for any period greater than ten (10) consecutive seconds which exceeds 20 percent opacity. Visible emissions when starting cold equipment shall be exempt from this requirement for the first ten (10) minutes.

[A.A.C. R18-2-702.B.1]

- c. The Permittee shall not emit gaseous or odorous materials from equipment, operations or premises under the Permittee's control in such quantities or concentrations as to cause air pollution.

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

2. Air Pollution Control Requirements

- a. The Permittee shall, to the extent practicable, operate and maintain the following equipment to minimize particulate matter emissions in a manner consistent with good air pollution control practices:

[A.A.C. R18-2-306.01.A and R18-2-331.A.3.e]

[Material Permit Conditions are identified by underlines]

- (1) A baghouse for grain unloading from the trucks and rail cars;
- (2) Three (3) baghouses for the grinding aspiration systems;
- (3) Dust separators for each of the five (5) exhausts from drying extruded pet food;
- (4) A baghouse for the live bottom bins aspiration system which handles particulates from pet food transfer processes;
- (5) A baghouse for the dryer legs aspiration systems which handle particulates from pet food conveyance;
- (6) A baghouse for the live bottom bin elevator legs and Rotex aspiration system which handles particulates from pet food transfer between processes;
- (7) A dust collector at the mixed meal weigh belt feeder to control particulate emissions during mixed meal transfer to the hammermills;

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- (8) Two (2) dust collectors to control particulate emissions from the grain transfer from storage bins to odd pound ingredient storage bins;
- (9) A dust collector to control particulate emissions from the coating operations;
- (10) A dust collector to control particulate emissions from the dryer conveyance lines;
- (11) A dust collector to control particulate emissions from the Merrick Batching processes; and
- (12) A dust collector to control particulate emissions from the Odd Pound Transporter processes.

- b. The Permittee shall, to the extent practicable, operate and maintain the cyclones on the extrusion units, FP coolers and hammermills to control particulate matter emissions in a manner consistent with good air pollution control practices.

[A.A.C. R18-2-306.01.A and -331.A.3.e]

[Material Permit Conditions are identified by underlines]

3. Monitoring, Recordkeeping, and Reporting Requirements

The Permittee shall conduct monthly opacity monitoring of the stack of each process equipment mentioned above when in operation as per Condition I.B.2 of Attachment "B".

[A.A.C. R18-2-306.A.3.c, -306.A.4.a and 306.A.5]

4. Permit Shield

Compliance with the Conditions of this Subsection shall be deemed compliance with A.A.C. R18-2-730.A, -730.D and 702.B.1.

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

C. Volatile Organic Compounds

1. Emissions Limitations and Standards

- a. The Permittee shall process, store, use and transport all materials including solvents or other volatile compounds, paints, acids, alkalies, pesticides, fertilizers and manure in such a manner and by such means that they will not evaporate, leak, escape or be otherwise discharge into the ambient air so as to cause or contribute to air pollution. Where means are available to reduce effectively the contribution to air pollution from evaporation, leakage or discharge, the installation and use of such control methods, devices, or equipment shall be mandatory.

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



IV. INTERNAL COMBUSTION ENGINES

- b. Where a stack, vent or other outlet is at such a level that fumes, gas mist, odor, smoke, vapor or any combination thereof constituting air pollution is discharged to adjoining property, the Director may require the installation of abatement equipment or the alteration of such stack, vent, or other outlet to a degree that will adequately dilute, reduce or eliminate the discharge of air pollution to adjoining property.

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

2. Permit Shield

Compliance with the Conditions of this Subsection shall be deemed compliance with A.A.C. R18-2-730.D, F and G.

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

**IV. INTERNAL COMBUSTION ENGINES**

**A. Applicability**

This Section is applicable to emergency internal combustion engines (ICEs) listed in the Equipment List in Attachment "C. ICEs subject to the requirements of this Section include:

1. Fire Water Pump - INSIG-1;
2. Delco Generator/Engine Set - INSIG-2; and
3. Onan Cummings Generator/Engine Set - INSIG-3.

**B. Emergency ICEs Subject to State Requirements**

1. Particulate Matter and Opacity

a. Emissions Limitations and Standards

- (1) The Permittee shall not cause, allow or permit the emission of particulate matter, caused by combustion of fuel, from any ICE into the atmosphere in excess of the amounts calculated by the following equation:

$$E = 1.02Q^{0.769}$$

Where:

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

Q = the heat input in million Btu per hour.

[A.A.C. R18-2-719.C.1]

IV. INTERNAL COMBUSTION ENGINES

- (2) For purposes of this Subsection, the heat input shall be the aggregate heat content of all fuels whose products of combustion pass through a stack or other outlet. The total heat input of all ICEs shall be used for determining the maximum allowable amount of particulate matter which may be emitted.  
[A.A.C. R18-2-719.B]

b. Opacity

The Permittee shall not cause, allow or permit to be emitted into the atmosphere from any ICE, smoke for any period greater than ten (10) consecutive seconds which exceeds 40 percent opacity. Visible emissions when starting cold equipment shall be exempt from this requirement for the first ten (10) minutes.

[A.A.C. R18-2-719.E]

c. Monitoring, Reporting, and Recordkeeping Requirements

The Permittee shall conduct monthly opacity monitoring for each ICE when in operation as per Condition I.B.2 of Attachment "B".

[A.A.C. R18-2-306.A.3.c, -306.A.4.a and 306.A.5]

2. Sulfur Dioxide

a. Emission Limitation and Standard

- (1) The Permittee shall not emit or cause to emit more than 1.0 pound of sulfur dioxide per million Btu.

[A.A.C. R18-2-719.F]

- (2) The Permittee shall not burn high sulfur diesel oil (greater than or equal to 0.9% sulfur by weight) in the non-emergency and emergency ICEs.

[A.A.C. R18-2-719.H]

b. Monitoring, Recordkeeping, and Reporting Requirements

- (1) The Permittee shall keep daily records of the sulfur content of the fuel oil being fired in the IC Engines. The Permittee shall keep records of fuel supplier certifications to demonstrate compliance with the sulfur content limit specified in this Condition IV.C.1 and Condition IV.D.2.a. The certification shall contain the sulfur content of the fuel and the method used to determine the sulfur content of the fuel. These records shall be made available to ADEQ upon request.

[A.A.C. R18-2-306.A.3.c and -719.I]

- (2) The Permittee shall report to the Director any daily period during which the sulfur content of the fuel being fired in any ICE exceeds 0.8 percent.

[A.A.C. R18-2-719.J]

IV. INTERNAL COMBUSTION ENGINES

3. Permit Shield

Compliance with the Conditions of this Subsection shall be deemed compliance with A.A.C. R18-2-719.C.1, -719.E, -719.F, -719.H, -719.I and -719.J.

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

C. Hazardous Air Pollutants

1. The requirements of 40 CFR 63, Subpart ZZZZ, are applicable to the internal combustion engines (ICEs) manufactured before June 12, 2006 as identified in Attachment "C".

[40 CFR 63.6580 and 40 CFR 63.6590]

2. General Requirements

a. Fuel Requirements

The Permittee shall use diesel fuel that meets the requirements in 40 CFR 1090.305 for nonroad diesel fuel, except that any existing diesel fuel purchased (or otherwise obtained) prior to January 1, 2015, may be used until depleted.

[40 CFR 63.6604(b)]

- b. At all times, the Permittee shall operate and maintain the ICEs, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.

[40 CFR 63.6605(b)]

c. Operation and Maintenance Requirements

- (1) The Permittee shall demonstrate continuous compliance with the following requirements except as allowed under Condition [Refer to (5)below]:

[40 CFR 63.6640(a) and 40 CFR 63, Subpart ZZZZ, Table 2d]

- (a) The Permittee shall change the oil and filter every 500 hours operation or annually, whichever comes first.

[40 CFR 63, Subpart ZZZZ, Table 2d]

- (b) The Permittee shall inspect the air cleaner every 1000 hours of operation or annually, whichever comes first, and replace as necessary.

[40 CFR 63, Subpart ZZZZ, Table 2d]

- (c) The Permittee shall inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

[40 CFR 63, Subpart ZZZZ, Table 2d]

IV. INTERNAL COMBUSTION ENGINES

- (2) The Permittee shall operate and maintain the ICEs and after-treatment control devices (if any) according to the manufacturer's emission-related written instructions. If no instructions are available, the Permittee shall develop its own maintenance plan which shall provide to the extent practicable for the maintenance and operation of the ICEs in a manner consistent with good air pollution control practice for minimizing emissions.  
[40 CFR 63.6625(e)]
- (3) The Permittee shall install a non-resettable hour meter on each ICE if one is not already installed.  
[40 CFR 63.6625(f)]
- (4) The Permittee shall minimize the time each ICE spent at idle and minimize the time each ICE spent at startup to a period needed for appropriate and safe loading of the ICE, not to exceed 30 minutes.  
[40 CFR 63.6625(h)]
- (5) The Permittee has the option to conduct an oil analysis program in order to extend the specified oil change requirement in Condition IV.C.2.c(1)(b). If the Permittee utilizes an oil analysis program, the Permittee shall follow the requirements of 40 CFR 63.6625(i).  
[40 CFR 63.6625(i)]
- (6) The Permittee shall report each instance in which Condition IV.C.2.c(1)(a) through Condition IV.D.2.c(1)(c) were not met. These instances are deviations from the emission and operating limitations in 40 CFR 63, Subpart ZZZZ. These deviations shall be reported according to the requirements in Condition IV.D.4.a.  
[40 CFR 63.6640(b)]

3. Compliance Demonstration

The Permittee shall demonstrate continuous compliance by operating and maintaining the ICEs according to the manufacturer's emission-related operation and maintenance instructions, or by developing and following its own maintenance plan which must provide to the extent practicable for the maintenance and operation of each ICE in a manner consistent with good air pollution control practice for minimizing emissions.

[40 CFR 63, Subpart ZZZZ, Table 6]

4. Recordkeeping and Reporting Requirements

- a. The Permittee shall submit all deviations and compliance reports pursuant to timelines specified in Condition VII.A and Condition XII.B of Attachment "A", respectively.

[40 CFR 63.6650(b)(5)]

- (1) Along with the annual compliance certification submitted for the Conditions specified in Section VII of Attachment "A", the

V. FUEL OIL STORAGE TANKS

Permittee shall submit an annual compliance report containing the information in 40 CFR 63.6650(c)(1) through 40 CFR 63.6650(c)(5):

[40 CFR 63.6650(c)]

- (2) For each deviation from an emissions or operating limitation that occurs, the annual compliance report shall contain the information required by 40 CFR 63.6650(d).

[40 CFR 63.6650(d)]

- (a) The total operating time of the ICE at which the deviation occurred during the reporting period.

[40 CFR 63.6650(d)(1)]

- (b) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

[40 CFR 63.6650(d)(2)]

- b. The Permittee shall keep the records specified in 40 CFR 63.6655(a) and 40 CFR 63.6655(e).

[40 CFR 63.6655(a) and 40 CFR 63.6655(e)]

- c. The Permittee shall keep records of the maintenance conducted on any ICE in order to demonstrate that it was operated and maintained according to manufacturer's emission-related operation and maintenance instructions or its own maintenance plan.

[40 CFR 63.6655(e) and 40 CFR 63, Table 6, Item 9]

5. Notification Requirement

The Permittee shall submit all of the applicable notifications in 40 CFR 63.7(b) and (c), 40 CFR 63.8(e), (f)(4) and (f)(6), 40 CFR 63.9(b) through (e), and (g) and (h) for ICEs greater than 100 HP.

[40 CFR 63.6645(a)(2) and (a)(5)]

6. Permit Shield

Compliance with the Conditions of this Section shall be deemed compliance with 40 CFR 63.6580, 40 CFR 63.6590, 40 CFR 63.6604(b), 40 CFR 63.6605(b), 40 CFR 63.6640(a), 40 CFR 63, Subpart ZZZZ, Table 2d, 40 CFR 63.6625(e), 40 CFR 63.6625(f), 40 CFR 63.6625(h), 40 CFR 63.6625(i), 40 CFR 63.6625(j), 40 CFR 63.6640(b), 40 CFR 63.6640(f), 40 CFR 63.6650(b)(5), 40 CFR 63.6650(c), 40 CFR 63.6650(d), 40 CFR 63.6655(a), 40 CFR 63.6655(e) and 40 CFR 63, Table 6, Item 9.

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

V. FUEL OIL STORAGE TANKS

A. Emissions Limitations and Standards

VI. FUGITIVE DUST REQUIREMENTS

1. The Permittee shall not emit gaseous or odorous materials from equipment, operations or premises under the facility's control in such quantities or concentrations as to cause air pollution.  
[A.A.C. R18-2-730.D]
2. The Permittee shall process, store, use and transport all materials including solvents or other volatile compounds, paints, acids, alkalies, pesticides, fertilizers and manure in such a manner and by such means that they will not evaporate, leak, escape or be otherwise discharge into the ambient air so as to cause or contribute to air pollution. Where means are available to reduce effectively the contribution to air pollution from evaporation, leakage or discharge, the installation and use of such control methods, devices, or equipment shall be mandatory.  
[A.A.C. R18-2-730.F]
3. Where a stack, vent or other outlet is at such a level that fumes, gas mist, odor, smoke, vapor or any combination thereof constituting air pollution is discharged to adjoining property, the Director may require the installation of abatement equipment or the alteration of such stack, vent, or other outlet by the Permittee thereof to a degree that will adequately dilute, reduce or eliminate the discharge of air pollution to adjoining property.  
[A.A.C. R18-2-730.G]

**B. Permit Shield**

Compliance with the Conditions of this Section shall be deemed compliance with A.A.C. R18-2-730.D, F and G.

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

**VI. FUGITIVE DUST REQUIREMENTS**

**A. Applicability**

This Section 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 and 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

VI. FUGITIVE DUST REQUIREMENTS

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 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. R18-2-605.B]

- (5) Take reasonable precautions, such as the use of spray bars, wetting agents, dust suppressants, covering the load, and hoods when crushing, screening, handling, transporting or conveying of materials or other operations likely to result in significant amounts of airborne dust;

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

- (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;

[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;

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

- (8) 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 Requirement

Unpaved Roads and Storage Piles

VII. OTHER PERIODIC ACTIVITIES

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

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

[Material Permit Conditions are indicated by underlines and italics]

3. Monitoring and Recordkeeping Requirements

a. The Permittee shall maintain records of the dates on which any of the activities listed in Condition VI.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

Each month, the Permittee shall monitor visible emissions from fugitive sources in accordance with Condition I.B.2 of Attachment "B".

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

C. Permit Shield

Compliance with the Conditions in this Section shall be deemed compliance with A.A.C. R18-2-604, -605, -606, 607, and -614.

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

**VII. OTHER PERIODIC ACTIVITIES**

A. Abrasive Blasting

1. Particulate Matter and Opacity

a. Emission Limitations and 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]



VII. OTHER PERIODIC ACTIVITIES

2. Monitoring and Recordkeeping Requirements

- a. 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]

- (1) The date the project was conducted;
- (2) The duration of the project; and
- (3) Type of control measures employed.

- b. Each time an abrasive blasting project is conducted, the Permittee shall monitor visible emissions from the project in accordance with Condition I.B.2 of Attachment "B".

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

3. Permit Shield

Compliance with Condition VII.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 and 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 VII.B.1.a(1), a photochemically reactive solvent shall be any solvent with an aggregate of more

VII. OTHER PERIODIC ACTIVITIES

than 20 percent of its total volume composed of the chemical compounds classified in Condition VII.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.

[[A.A.C. R18-2-727.C.1]

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

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

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

[A.A.C. R18-2-727.C.3]

(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 III.B.1.a(3), 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.A.C. R18-2-306.A.3.c]

(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 VII.B.1.b(1).

VII. OTHER PERIODIC ACTIVITIES

c. Permit Shield

Compliance with Condition VII.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 and 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. Monitoring, Recordkeeping and Reporting Requirements

Each time a spray painting project is conducted, the Permittee shall monitor visible emissions in accordance with Condition I.B.2 of Attachment "B".

c. Permit Shield

Compliance with Condition VII.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 and Standard

The Permittee shall comply with all of the requirements of 40 CFR 61 Subpart M for National Emission 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 VII.C.1 shall be deemed compliance with A.A.C. R18-2-1101.A.12.

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

: EQUIPMENT LIST

ATTACHMENT “C”: EQUIPMENT LIST

| EQUIPMENT TYPE                               | MAX. CAPACITY                        | MAKE             | MODEL      | SERIAL NUMBER | INSTALLATION/ MFG. DATE | EQUIPMENT ID | A.A.C. / NSPS / NESHAP |
|--|--------------------------------------|------------------|------------|---------------|-------------------------|--------------|------------------------|
| Dust Collector #7<br>(Truck Receiving)       | 125,000 lbs/hr                       | Buhler-Miag      | PRF-120/10 | N/A           | 1975                    | 1            | A.A.C. R18-2-730       |
| Dust Collector #24<br>(Rail Receiving)       | 162,000 lbs/hr                       | Buhler-Miag      | PRF-90/10  | N/A           | 1975                    | 2            | A.A.C. R18-2-730       |
| Dust Collector #157<br>(Grinding Aspiration) | 30,000 lbs/hr                        | Buhler-Miag      | ASF 44/10  | N/A           | 1974                    | 3            | A.A.C. R18-2-730       |
| Dust Collector #238<br>(Grinding Aspiration) | 30,000 lbs/hr                        | Buhler-Miag      | ASF 44/10  | N/A           | 1975                    | 4            | A.A.C. R18-2-730       |
| By-Product Dryer<br>(Fan #1958)              | 16,000 lbs/hr                        | Buhler Separator | N/A        | K21001        | 2001                    | 5            | A.A.C. R18-2-730       |
| Dryer #1<br>(Fan #997)                       | 22,500 lbs/hr                        | Buhler Separator | N/A        | K20992        | 2001                    | 6            | A.A.C. R18-2-730       |
| Dryer #1 Natural Gas<br>(Fan #1520)          | 32,000 lbs/hr<br>or<br>17.1 MMBtu/hr | Buhler Separator | PDAZ-110   | N/A           | 2019                    | 6 NG         | A.A.C. R18-2-730       |

: EQUIPMENT LIST

| EQUIPMENT TYPE   | MAX. CAPACITY          | MAKE              | MODEL  | SERIAL NUMBER | INSTALLATION/ MFG. DATE | EQUIPMENT ID        | A.A.C. / NSPS / NESHAP |
|--|------------------------|-------------------|--------|---------------|-------------------------|---------------------|------------------------|
| Dryer #2<br>(Fan #1098)  | 22,500 lbs/hr          | Buhler Separator  | N/A    | K20993        | 2001                    | 7                   | A.A.C. R18-2-730       |
| Dryer #3<br>(Fan #1198)  | 22,500 lbs/hr          | Buhler Separator  | N/A    | K20994        | 2001                    | Ducted to 39 Stack8 | A.A.C. R18-2-730       |
| Dryer #4<br>(Fan #1298)  | 22,500 lbs/hr          | Buhler Separator  | N/A    | K20995        | 2001                    | 9                   | A.A.C. R18-2-730       |
| Boiler #7082   | 65/40<br>MMBtu/hr      | Erie City Boilers | N/A    | 98859         | 1973                    | 10                  | A.A.C. R18-2-724       |
| Boiler #7105   | 48.5/37.33<br>MMBtu/hr | Erie City Boilers | N/A    | 98860         | 1973                    | 11                  | A.A.C. R18-2-724       |
| Live bottom Bin<br>Aspiration<br>(Dust Collector<br>Fan #1038) | 112,500<br>lbs/hr      | Modu-Kleen        | 96A-16 | N/A           | 1979                    | 12                  | A.A.C. R18-2-730       |
| Dryer Legs<br>Aspiration<br>(Dust Collector<br>Fan # 1028)     | 112,500<br>lbs/hr      | Modu-Kleen        | 84-81  | N/A           | 1979                    | 13                  | A.A.C. R18-2-730       |

: EQUIPMENT LIST

| EQUIPMENT TYPE                                       | MAX. CAPACITY  | MAKE       | MODEL   | SERIAL NUMBER | INSTALLATION/ MFG. DATE | EQUIPMENT ID | A.A.C. / NSPS / NESHP |
|--|----------------|------------|---------|---------------|-------------------------|--------------|-----------------------|
| LBB Legs/Rotex Aspiration (Dust Collector Fan #1004) | 112,500 lbs/hr | Modu-Kleen | 84A-81  | N/A           | 1979                    | 14           | A.A.C. R18-2-730      |
| FP Cooler System #1 Cyclone (Plant ID#: 3513)        | 40,000 lbs/hr  | Buhler     | PDAZ-28 | N/A           | 1997                    | 19           | A.A.C. R18-2-730      |
| FP Cooler System #2 Cyclone (Plant ID#: 3523)        | 40,000 lbs/hr  | Buhler     | PDAZ-28 | N/A           | 1997                    | 20           | A.A.C. R18-2-730      |
| FP Cooler System #4 Cyclone (Plant ID#: 2460)        | 60,000 lbs/hr  | Buhler     | PDAZ-28 | N/A           | 2000                    | 21           | A.A.C. R18-2-730      |
| Fuel Oil Storage - Tank 1                            | 78,000 gal     | N/A        | N/A     | N/A           | 1975                    | 22           | A.A.C. R18-2-730      |
| Fuel Oil Storage - Tank 2                            | 78,000 gal     | N/A        | N/A     | N/A           | 1975                    | 23           | A.A.C. R18-2-730      |
| Odd Pound Ingredient Storage Silo #1 bin vent        | 24,000 lbs/hr  | N/A        | N/A     | N/A           | N/A                     | 24           | A.A.C. R18-2-730      |

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| EQUIPMENT TYPE                                | MAX. CAPACITY                           | MAKE                                       | MODEL            | SERIAL NUMBER | INSTALLATION/ MFG. DATE | EQUIPMENT ID       | A.A.C. / NSPS / NESHAP |
|---|---|--|------------------|---------------|-------------------------|--------------------|------------------------|
| Odd Pound Ingredient Storage Silo #2 bin vent | 24,000 lbs/hr                           | N/A  | N/A              | N/A           | N/A                     | 25                 | A.A.C. R18-2-730       |
| Dust Collector #728 (Grinding Aspiration)     | 30,000 lbs/hr                           | MAC  | 55STC56 Style II | N/A           | 2008                    | 26                 | A.A.C. R18-2-730       |
| Dryer #5 (Fan #1400)                          | 30,000 lbs/hr<br>or<br>17.1<br>MMBTU/hr | Aeroglide<br>Dryer/<br>Buhler<br>Separator | PDAZ-110         | N/A           | 2008                    | 27                 | A.A.C. R18-2-730       |
| FP Cooler System #3 Cyclone (Plant ID #1884)  | 60,000 lbs/hr                           | Buhler                                     | PDAZ-28          | N/A           | 2008                    | 29                 | A.A.C. R18-2-730       |
| Mixed Meal Dust Collector #728                | 30,000 lbs/hr                           | MAC  | 39RTC1           | 122279-021-1  | 2008                    | 30                 | A.A.C. R18-2-730       |
| Mill Building Dust Collector North            | 15,000 lbs/hr                           | Dynamic Air                                | Modukleen        | 213445        | 1975                    | 31                 | A.A.C. R18-2-730       |
| Mill Building Dust Collector South            | 15,000 lbs/hr                           | Dynamic Air                                | Modukleen        | 213444        | 1975                    | 32                 | A.A.C. R18-2-730       |
| Hammermills Cyclones (2) 31a, 31b             | 25,200 lbs/hr                           | Buhler<br>Miag                             | ASF & Type B     | 115 & 74-114  | 1975                    | Ducted to 31 Stack | A.A.C. R18-2-730       |

: EQUIPMENT LIST

| EQUIPMENT TYPE   | MAX. CAPACITY  | MAKE                      | MODEL        | SERIAL NUMBER | INSTALLATION/ MFG. DATE | EQUIPMENT ID       | A.A.C. / NSPS / NESHP |
|--|----------------|---------------------------|--------------|---------------|-------------------------|--------------------|-----------------------|
| Hammermills Cyclones (2)<br>32a, 32b                         | 25,200 lbs/hr  | Buhler Miag               | ASF & Type B | 119 & 74-116  | 1975                    | Ducted to 32 Stack | A.A.C. R18-2-730      |
| Coatings – Dust Collector #123                               | 3,500 lbs/hr   | Scientific Dust Collector | SPJ-30-X4B8  | 65121         | 2013                    | 33                 | A.A.C. R18-2-730      |
| DA Mixer System #1 Cyclone (#687)                            | 40,000 lbs/hr  | Coperion K-Tron Cyclone   | S-500406-en  | N/A           | 2014                    | 34                 | A.A.C. R18-2-730      |
| DA Mixer System #2 Cyclone (#690)                            | 40,000 lbs/hr  | Coperion K-Tron Cyclone   | S-500406-en  | N/A           | 2014                    | 35                 | A.A.C. R18-2-730      |
| DA Mixer System #1 Cyclone (#697)                            | 60,000 lbs/hr  | Coperion K-Tron Cyclone   | S-500406-en  | N/A           | 2014                    | 36                 | A.A.C. R18-2-730      |
| DA Mixer System #1 Cyclone (#694)                            | 60,000 lbs/hr  | Coperion K-Tron Cyclone   | S-500406-en  | N/A           | 2014                    | 37                 | A.A.C. R18-2-730      |
| Batching Dust Collector #598                                 | 30,000 lbs/hr  | MAC                       | N/A          | N/A           | 2015                    | 38                 | A.A.C. R18-2-730      |
| Extrusion Units 1-5; Previous EP #'s 15, 16, 17, 18, 28, & 8 | 162,500 lbs/hr | N/A                       | N/A          | N/A           | 2017                    | 39                 | A.A.C. R18-2-730      |



: EQUIPMENT LIST

| EQUIPMENT TYPE                             | MAX. CAPACITY  | MAKE                                      | MODEL          | SERIAL NUMBER           | INSTALLATION/ MFG. DATE | EQUIPMENT ID | A.A.C. / NSPS / NESHAP                               |
|--|----------------|---|----------------|-------------------------|-------------------------|--------------|--|
| Dust Collector #1527 (Dryer #1 Conveyance) | 150,000 lbs/hr | Schenck Dust Collector                    | 39AVRC39       | N/A                     | 2019                    | 40           | A.A.C. R18-2-730                                     |
| Merrick Batching                           | 48,000 lbs/hr  | Schenck-Cyclone Collector                 | 39AVRC21       | 110038153<br>1-130-1    | 2019                    | 41           | A.A.C. R18-2-730                                     |
| Odd Pound Transporter                      | 16,000 lbs/hr  | Modu-Kleen Series 800                     | 694            | N/A                     | 2024                    | 42           | A.A.C. R18-2-730                                     |
| Fire Water Pump Engine                     | 255 hp         | Cummins                                   | NT855F1353     | 10435299                | 1975                    | INSIG-1      | A.A.C. R18-2-719;<br>40 CFR Part 63,<br>Subpart ZZZZ |
| Delco Generator/Engine Set                 | 100 hp         | Detroit Engine / Delco Generator (Diesel) | 353 / E5899    | 238-B-71 (Engine)       | 1985                    | INSIG-2      | A.A.C. R18-2-719;<br>40 CFR Part 63,<br>Subpart ZZZZ |
| Onan Cummings Generator/Engine Set         | 225 hp         | Cummins Engine / Onan Generator           | GGLB / 5955981 | L0701355<br>38 (Engine) | 2008                    | INSIG-3      | A.A.C. R18-2-719;<br>Subpart ZZZZ                    |

\*N/A – Not APPLICABLE or AVAILABLE.