Salt River Materials Group

100% AMERICAN™

September 20, 2023

RE: Application for Renewal of the Phoenix Cement Company's Cholla Facility (Air Quality Control Permit #75241)

VIA EMAIL

Mr. Dan Czecholinksi
Director, Air Quality Division
ADEQ
1110 West Washington Street
Phoenix, AZ 85007

Dear Mr. Czecholinksi:

We are submitting the Application for Renewal for Phoenix Cement Company's Cholla Facility (Air Quality Control Permit No. 75241). The current permit expires on April 8, 2024. If you have any questions relating to this application, please contact me at your earliest convenience at (928) 634-2261 extension 8062.

Respectfully,

Brett Lindsay
Senior Director, Cement Operations and Environmental
Phoenix Cement Company

Cc: Verle Martz, SRMG

SECTION 3.1

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

Air Quality Division

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

STANDARD CLASS II PERMIT APPLICATION FORM

(As required by A.R.S. § 49-426, and Chapter 2, Article 3, Arizona Administrative Code)

1. Permit to be issued to (Business license name of organization that is to receive permit):
   Phoenix Cement Company

2. Mailing Address: P.O. Box 428
   City: Clarkdale State: Arizona ZIP: 86324

3. Name (or names) of Responsible Official: Albert Putzig
   Phone: 480-850-5757 ext 4343 Fax: 480-850-5758 Email: aputzig@srmaterials.com

4. Facility Manager/Contact Person and Title: Tyson Miller, Facility Manager
   Phone: 928-288-1661 Fax: 928-288-1663 Email: tmiller@srmaterials.com

5. Facility Name: Cholla Facility
   Facility Location/Address (Current/Proposed): APS Cholla Power Plant
   City: Joseph City County: Navajo ZIP: 86032
   Indian Reservation (if applicable, which one):
   Latitude/Longitude, Elevation: 34 deg 56' 22" N, 110 deg 17' 53" W

6. General Nature of Business: Flyash Beneficiation and Loadout Facility

7. Type of Organization:
   ☐ Corporation ☐ Individual Owner ☐ Partnership ☐ Government Entity ☐ LLC
   ☒ Other Division of the Salt River Pima-Maricopa Indian Community

8. Permit Application Basis: ☐ New Source ☐ Revision ☒ Renewal of Existing Permit
   For renewal or modification, include existing permit number (and exp. date): 75241 Expires 4/8/24
   Date of Commencement of Construction or Modification:
   Primary Standard Industrial Classification Code: 5032

9. I certify that I have knowledge of the facts herein set forth, that the same are true, accurate and complete to the best of my knowledge and belief, and that all information not identified by me as confidential in nature shall be treated by ADEQ as public record. I also attest that I am in compliance with the applicable requirements of the Permit and will continue to comply with such requirements and any future requirements that become effective during the life of the Permit. I will present a certification of compliance to ADEQ no less than annually and more frequently if specified by ADEQ. I further state that

I will assume responsibility for the construction, modification, or operation of the source in accordance with Arizona Administrative Code, Title 18, Chapter 2 and any permit issued thereof.

Signature of Responsible Official: Albert M Putzig

Printed Name of Signer/Official Title: Albert Putzig, Sr. Director, Regional Pozzolan Manufacturing & Operations

Date: September 19, 2023 Telephone Number: 480-850-5757 ext 4343

Section 3.5 - Equipment List

Type of Equipment	Maximum Rated Capacity [1]	Make	Model	Serial Number	Date of Manufacture	Equipment ID Number
Raw Feed						
Dust Collector	16,000 cfm	General Electric	154-6-12P	N/A	1985	001
Product						
Dust Collector	10,000 cfm	General Electric	126-6-12P	N/A	1985	002
Loadout						
Dust Collector	4,000 cfm	N/A	Not Provided	N/A	1973	003
Classifier	25 tph	Buell	C66-33	N/A	1985	004
Classifier	25 tph	Buell	C66-33	N/A	1985	005
Cyclone	25 tph	Buell	2B-58G43A	N/A	1985	006
Cyclone	25 tph	Buell	2B-58G43A	N/A	1985	007
Raw Feed Silo	475 Ton	Shuff Steel	Custom Built	N/A	1983	009
Product Silo	623 Ton	Shuff Steel	Custom Built	N/A	1983	010

[1} For generator sets, enter the maximum rated capacity of the engine rather than the maximum rated capacity of the generator.

All relevant equipment utilized at the facility should be included in the equipment list. Please complete all fields.
The date of manufacture must be included in order to determine applicability of regulations.
Indicate the units (tons/hour, horsepower, etc.) when recording the maximum rated capacity.
Make additional copies of this form if necessary.
***Submit photographs of the faceplates for all engines listed above.**
***If an engine is certified, please also include a copy of the engine certification with the application.**
***For any newly added equipment, include a copy of the specification sheet.**
***These documents will be used to verify equipment information and determine applicable regulations.**

SECTION 3.6 - EMISSION SOURCE FORM

					USE THIS SECTION FOR MODIFICATIONS ONLY		
Emission Point		Regulated Air Pollutant Name	PTE		PTE AFTER MODIFICATION		CHANGE IN PTE
Number	Name		lbs/hr	tons/yr	lbs/hr	tons/yr	tons/yr
1	Raw Feed	PM / PM10	2.7	12.0			
	Dust Collector						
2	Product	PM / PM10	1.7	7.5			
	Dust Collector						
3	Loadout	PM / PM10	0.69	3.0			
	Dust Collector						

****Submit emission calculations spreadsheet with your application****

APPENDIX A

AIR QUALITY PERMIT NO. 75241

PERMIT #75241

PLACE ID #14312

PERMITTEE:	**Phoenix Cement Company**
FACILITY:	**Cholla Generating Station-Flyash Handling Facility**
PERMIT TYPE:	**Class II Air Quality Permit**
DATE ISSUED:	**April 10, 2019**
EXPIRY DATE:	**April 08, 2024**

SUMMARY

This Class II air quality permit is issued to Phoenix Cement Company, the Permittee, for the continued operation of the flyash handling facility. The facility is located at Cholla generating station in Joseph City, Arizona. This permit renews and supersedes Permit No. 59717.

The flyash facility consists of two 25 tons per hour (tph) classifiers, four baghouse dust collectors with maximum rated capacities of 16,000, 10,000, 3,000, and 21,000 cubic feet per minute (CFM), and two 25 tph cyclones. This facility operates entirely on commercial electric power.

This facility has a potential to emit (PTE) without controls and operating hours limitations, significant levels of particulate matter (PM) and particulate matter with an aerodynamic diameter less than 10 microns (PM_{10}) as defined by the Arizona Administrative Code A.A.C.R18-2-101.130. A Class II permit shall be required for any stationary source that emits or has the uncontrolled potential to emit, significant quantities of regulated NSR pollutants in accordance with A.A.C.R18-2-302.B.2.

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

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ATTACHMENT "A": GENERAL PROVISIONS

I. PERMIT EXPIRATION AND RENEWAL

A. This permit is valid for a period of five (5) years from the date of issuance.
[ARS § 49-426.F, A.A.C. R18-2-306.A.1]

B. The Permittee shall submit an application for renewal of this permit at least six (6) months, but not more than eighteen (18) months, prior to the date of permit expiration.
[A.A.C. R18-2-304.D.2]

II. COMPLIANCE WITH PERMIT CONDITIONS

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

B. It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
[A.A.C. R18-2-306.A.8.b]

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

A. The permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a permit revision, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[A.A.C. R18-2-306.A.8.c]

B. The permit shall be reopened and revised under any of the following circumstances:

1. The Director or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; and
[A.A.C. R18-2-321.A.1.c]

2. The Director or the Administrator determines that the permit needs to be revised or revoked to assure compliance with the applicable requirements.
[A.A.C. R18-2-321.A.1.d]

C. Proceedings to reopen and issue a permit, including appeal of any final action relating to a permit reopening, shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening

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

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

IV. POSTING OF PERMIT

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

1. Current permit number; or

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

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

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

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

V. FEE PAYMENT

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

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

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

VI. ANNUAL EMISSION INVENTORY QUESTIONNAIRE

A. The Permittee shall complete and submit to the Director an annual emissions inventory questionnaire. The questionnaire is due by March 31st or ninety (90) days after the Director makes the inventory form available each year, whichever occurs later, and shall include emission information for the previous calendar year.

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

B. The questionnaire shall be on a form provided by the Director and shall include the information required by A.A.C. R18-2-327.B.

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

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. R18-2-309.2c.ii]

3. Status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certifications shall identify each deviation (including any deviations reported pursuant to Condition XII.B of this Attachment) during the period covered by the certification and take it into account for consideration in the compliance certification
[A.A.C. R18-2-309.2.c.iii]

4. For emission units subject to 40 CFR Part 64, the certification shall also identify as possible exceptions to compliance any period during which compliance is required and in which an excursion or exceedance defined under 40 CFR Part 64 occurred;
[A.A.C. R18-2-309.2.c.iii]

5. Other facts the Director may require in determining the compliance status of the source.
[A.A.C. R18-2-309.2.c.iv]

C. A progress report on all outstanding compliance schedules shall be submitted every six months beginning six months after permit issuance.
[A.A.C. R18-2-309.5.d]

VIII. CERTIFICATION OF TRUTH, ACCURACY AND COMPLETENESS

Any document required to be submitted by this permit, including reports, shall contain a certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
[A.A.C. R18-2-309.3]

IX. INSPECTION AND ENTRY

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

A. Enter upon the Permittee's premises where a source is located, emissions-related activity is conducted, or where records are required to be kept under the conditions of the permit;
[A.A.C. R18-2-309.4.a]

B. Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;
[A.A.C. R18-2-309.4.b]

C. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
[A.A.C. R18-2-309.4.c]

D. Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements; and

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

E. Record any inspection by use of written, electronic, magnetic and photographic media.

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

X. PERMIT REVISION PURSUANT TO FEDERAL HAZARDOUS AIR POLLUTANT STANDARD

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

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

XI. ACCIDENTAL RELEASE PROGRAM

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

[40 CFR Part 68]

XII. EXCESS EMISSIONS, PERMIT DEVIATIONS, AND EMERGENCY REPORTING

A. Excess Emissions Reporting

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

1. Excess emissions shall be reported as follows:

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

      (1) Notification by telephone or facsimile within 24 hours of the time when the Permittee first learned of the occurrence of excess emissions including all available information from Condition XII.A.1.b below.

      (2) Detailed written notification by submission of an excess emissions report within 72 hours of the notification pursuant to Condition XII.A.1.a(1) above.

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

   b. The report shall contain the following information:

      (1) Identity of each stack or other emission point where the excess emissions occurred;

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

      (2) Magnitude of the excess emissions expressed in the units of the applicable emission limitation and the operating data and

calculations used in determining the magnitude of the excess emissions;

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

(3) Time and duration, or expected duration, of the excess emissions;

[A.A.C. R18-2-310.01.B.3]

(4) Identity of the equipment from which the excess emissions emanated;

[A.A.C. R18-2-310.01.B.4]

(5) Nature and cause of the emissions;

[A.A.C. R18-2-310.01.B.5]

(6) If the excess emissions were the result of a malfunction, steps taken to remedy the malfunction and the steps taken or planned to prevent the recurrence of such malfunctions;

[A.A.C. R18-2-310.01.B.6]

(7) Steps that were or are being taken to limit the excess emissions; and

[A.A.C. R18-2-310.01.B.7]

(8) If the excess emissions resulted from start-up or malfunction, the report shall contain a list of the steps taken to comply with the permit procedures governing source operation during periods of startup or malfunction..

[A.A.C. R18-2-310.01.B.8]

2. In the case of continuous or recurring excess emissions, the notification requirements shall be satisfied if the source provides the required notification after excess emissions are first detected and includes in such notification an estimate of the time the excess emissions will continue. Excess emissions occurring after the estimated time period, or changes in the nature of the emissions as originally reported, shall require additional notification pursuant to Condition XII.A.1 above.

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

B. Permit Deviations Reporting

The Permittee shall promptly report deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the applicable requirement contains a definition of prompt or otherwise specifies a timeframe for reporting deviations, that definition or timeframe shall govern. Where the applicable requirement does not address the timeframe for reporting deviations, the Permittee shall submit reports of deviations according to the following schedule:

1. Notice that complies with Condition XII.A above is prompt for deviations that constitute excess emissions;

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

2. Notice that is submitted within two working days of discovery of the deviation is prompt for deviations of permit conditions identified by Condition I.B.3 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 the "Annual/Semiannual Deviation Monitoring Report" form available on the Arizona Department of Environmental Quality Website.

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

C. Emergency Provision

1. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, that require immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

[A.A.C. R18-2-306.E.1]

2. An emergency constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if Condition XII.C.3 below is met.

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

3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

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

a. An emergency occurred and that the Permittee can identify the cause(s) of the emergency;

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

b. The permitted facility was being properly operated at the time of the emergency;

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

c. During the period of the emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and

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

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

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

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

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

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

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

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

1. Applicability

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

a. Promulgated pursuant to Sections 111 or 112 of the Act;

[A.A.C. R18-2-310.A.1]

b. Promulgated pursuant to Titles IV or VI of the Clean Air Act;

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

c. Contained in any Prevention of Significant Deterioration (PSD) or New Source Review (NSR) permit issued by the U.S. EPA;

[A.A.C. R18-2-310.A.3]

d. Contained in A.A.C. R18-2-715.F; or

[A.A.C. R18-2-310.A.4]

e. Included in a permit to meet the requirements of A.A.C. R18-2-406.A.5.

[A.A.C. R18-2-310.A.5]

2. Affirmative Defense for Malfunctions

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

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

a. The excess emissions resulted from a sudden and unavoidable breakdown of process equipment or air pollution control equipment beyond the reasonable control of the Permittee;

[A.A.C. R18-2-310.B.1]

b. The air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;

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

c. If repairs were required, the repairs were made in an expeditious fashion when the applicable emission limitations were being exceeded. Off-shift labor and overtime were utilized where practicable to ensure that the repairs were made as expeditiously as possible. If off-shift labor and overtime were not utilized, the Permittee satisfactorily demonstrated that the measures were impracticable;

[A.A.C. R18-2-310.B.3]

d. The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;

[A.A.C. R18-2-310.B.4]

e. All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;

[A.A.C. R18-2-310.B.5]

f. The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance;

[A.A.C. R18-2-310.B.6]

g. During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in Title 18, Chapter 2, Article 2 of the Arizona Administrative Code that could be attributed to the emitting source;

[A.A.C. R18-2-310.B.7]

h. The excess emissions did not stem from any activity or event that could have been foreseen and avoided, or planned, and could not have been avoided by better operations and maintenance practices;

[A.A.C. R18-2-310.B.8]

i. All emissions monitoring systems were kept in operation if at all practicable; and

[A.A.C. R18-2-310.B.9]

j. The Permittee's actions in response to the excess emissions were documented by contemporaneous records.

[A.A.C. R18-2-310.B.10]

3. Affirmative Defense for Startup and Shutdown

a. Except as provided in Condition XII.D.3 below, and unless otherwise provided for in the applicable requirement, emissions in excess of an applicable emission limitation due to startup and shutdown shall constitute a violation. When emissions in excess of an applicable emission limitation are due to startup and shutdown, the Permittee has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the Permittee has complied with the reporting requirements of A.A.C. R18-2-310.01 and has demonstrated all of the following:

[A.A.C. R18-2-310.C.1]

(1) The excess emissions could not have been prevented through careful and prudent planning and design;

[A.A.C. R18-2-310.C.1.a]

(2) If the excess emissions were the result of a bypass of control equipment, the bypass was unavoidable to prevent loss of life, personal injury, or severe damage to air pollution control equipment, production equipment, or other property;

[A.A.C. R18-2-310.C.1.b]

(3) The air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;

[A.A.C. R18-2-310.C.1.c]

(4) The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;

[A.A.C. R18-2-310.C.1.d]

(5) All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;

[A.A.C. R18-2-310.C.1.e]

(6) During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in Title 18, Chapter 2, Article 2 of the Arizona Administrative Code that could be attributed to the emitting source;

[A.A.C. R18-2-310.C.1.f]

(7) All emissions monitoring systems were kept in operation if at all practicable; and

[A.A.C. R18-2-310.C.1.g]

(8) Contemporaneous records documented the Permittee's actions in response to the excess emissions.

[A.A.C. R18-2-310.C.1.h]

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

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

4. Affirmative Defense for Malfunctions During Scheduled Maintenance

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

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

5. Demonstration of Reasonable and Practicable Measures

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

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

XIII. RECORDKEEPING REQUIREMENTS

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

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

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. REPORTING REQUIREMENTS

The Permittee shall submit the following reports:

A. Compliance certifications in accordance with Section VII above.

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

B. Excess emission; permit deviation, and emergency reports in accordance with Section XII above.

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

C. Other reports required by any condition of Attachment "B".

XV. 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]

XVI. 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 - Class II (A.A.C. R18-2-317.01);

[A.A.C. R18-2-317.01]

B. Administrative Permit Amendment (A.A.C. R18-2-318);

[A.A.C. R18-2-318]

C. Minor Permit Revision (A.A.C. R18-2-319); and

[A.A.C. R18-2-319]

D. Significant Permit Revision (A.A.C. R18-2-320).

[A.A.C. R18-2-320]

E. The applicability and requirements for such action are defined in the above referenced regulations.

XVII. FACILITY CHANGE WITHOUT A PERMIT REVISION

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

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

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

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

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

2. Changing process equipment, operating procedures, or making any other physical change if the permit requires the change to be logged;

3. Engaging in any new insignificant activity listed in A.A.C. R18-2-101.68 but not listed in the permit;

4. Replacing an item of air pollution control equipment listed in the permit with an identical (same model, different serial number) item. The Director may require verification of efficiency of the new equipment by performance tests; and

5. A change that results in a decrease in actual emissions if the source wants to claim credit for the decrease in determining whether the source has a net emissions increase for any purpose. The logged information shall include a description of the change that will produce the decrease in actual emissions. A decrease that has not been logged is creditable only if the decrease is quantifiable, enforceable, and otherwise qualifies as a creditable decrease.

C. Except as provided in the conditions applicable to an emissions cap created under A.A.C. R18-2-306.02, the following changes may be made if the source provides written notice to the Department in advance of the change as provided below:

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

1. Replacing an item of air pollution control equipment listed in the permit with one that is not identical but that is substantially similar and has the same or better pollutant removal efficiency: 7 days. The Director may require verification of efficiency of the new equipment by performance tests;

2. A physical change or change in the method of operation that increases actual emissions more than 10% of the major source threshold for any conventional pollutant but does not require a permit revision: 7 days;

3. Replacing an item of air pollution control equipment listed in the permit with one that is not substantially similar but that has the same or better efficiency: 30 days. The Director may require verification of efficiency of the new equipment by performance tests;

4. A change that would trigger an applicable requirement that already exists in the permit: 30 days unless otherwise required by the applicable requirement;

5. A change that amounts to reconstruction of the source or an affected facility: 7 days. For the purposes of this subsection, reconstruction of a source or an affected facility shall be presumed if the fixed capital cost of the new components exceeds 50% of the fixed capital cost of a comparable entirely new source or affected facility and the changes to the components have occurred over the 12 consecutive months beginning with commencement of construction; and

6. A change that will result in the emissions of a new regulated air pollutant above an applicable regulatory threshold but that does not trigger a new applicable requirement for that source category: 30 days. For purposes of this requirement, an applicable regulatory threshold for a conventional air pollutant shall be 10% of the applicable major source threshold for that pollutant.

D. For each change under Condition XVII.C, the written notice shall be by certified mail or hand delivery and shall be received by the Director the minimum amount of time in advance of the change. Notifications of changes associated with emergency conditions, such as malfunctions necessitating the replacement of equipment, may be provided with less than required notice, but must be provided as far in advance of the change, or if advance notification is not practicable, as soon after the change as possible. The written notice shall include:

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

1. When the proposed change will occur;

2. A description of the change;

3. Any change in emissions of regulated air pollutants; and

4. Any permit term or condition that is no longer applicable as a result of the change.

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

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

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

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

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

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

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

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

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

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

J. Logging Requirements

[Arizona Administrative Code, Appendix 3]

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

   a. A description of the change, including:

(1) A description of any process change;

(2) A description of any equipment change, including both old and new equipment descriptions, model numbers, and serial numbers, or any other unique equipment ID number; and

(3) A description of any process material change.

b. The date and time that the change occurred.

c. The provision of A.A.C. R18-2-317.02.B that authorizes the change to be made with logging.

d. The date the entry was made and the first and last name of the person making the entry.

2. Logs shall be kept for five (5) years from the date created. Logging shall be performed in indelible ink in a bound log book with sequentially number pages, or in any other form, including electronic format, approved by the Director.

XVIII. TESTING REQUIREMENTS

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

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

B. Operational Conditions during Performance Testing

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

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

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

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

D. Test Plan

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

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

1. Test duration;

2. Test location(s);

3. Test method(s); and

4. Source operation and other parameters that may affect test results.

E. Stack Sampling Facilities

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

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

1. Sampling ports adequate for test methods applicable to the facility;

2. Safe sampling platform(s);

3. Safe access to sampling platform(s); and

4. Utilities for sampling and testing equipment.

F. Interpretation of Final Results

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

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

G. Report of Final Test Results

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

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

H. Extension of Performance Test Deadline

For performance testing required under Condition XVIII.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 XVIII.H.1, 2, and 3 above, the Permittee remains subject to the requirements of Section XVIII.
[A.A.C. R18-2-312.J.4]

5. For purposes of this Section XVIII, 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]

XIX. 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]

XX. 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]

XXI. 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 XVI.B of this Attachment and any facility changes without a permit revision pursuant to Section XVII of this Attachment.

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

XXII. PROTECTION OF STRATOSPHER IC 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]

XXIII. 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. 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.A.1.a(2) and (1)

(1) EPA Reference Method 9 Certified Observer.
[A.A.C. R18-2-306.A.3.c]

(2) 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 30 minutes.
[A.A.C. R18-2-311.b]

b. Six-Minute Observations

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

(1) EPA Reference Method 9 Certified Observer.
[A.A.C. R18-2-306.A.3.c]

(2) 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 30 minutes.
[A.A.C. R18-2-311.b]

c. The Permittee shall have on site or on call a person certified in EPA Reference Method 9 unless all 6- minute Method 9 observations required by this permit are conducted as a 6-minute Alternative Method-082 (Digital Camera Operating Technique) and all instantaneous visual surveys required by this permit are conducted as an instantaneous Alt-082 camera survey. Any 6-minute Method 9 observation required by this permit can be conducted as a 6-minute Alternative Method-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. 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.

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

B. Reporting Requirements

1. At the time of compliance certifications required by Section VII of Attachment "A" are submitted, the Permittee shall submit reports of all monitoring activities required by Attachment "B" performed during the 12-month compliance term.

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

2. The Permittee shall keep a log of all air emission related maintenance activities performed at the facility.

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

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

a. II.C

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

II. FLYASH HANDLING REQUIREMENTS

A. Applicability

This Section applies to the flyash handling operations in the facility. This shall include, but shall not be limited to dust collectors, classifiers, cyclones, raw feed silo, product silo, trucks and railcars during the loading and unloading of flyash.

B. Emissions Limitations/ Standards

1. The opacity of any plume or effluent shall not be greater than 20 percent.

[A.A.C. R 18-2-702.B]

2. The Permittee shall not cause, allow, or permit the discharge of particulate matter into the atmosphere, except as fugitive emissions, at rates greater than the following:

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

Where:

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

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

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

3. When applying the process weight rate equation, the Permittee shall utilize the total process weight from all similar units employing a similar type process to determine the maximum allowable emissions of particulate matter.

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

C. Air Pollution Control Requirements

The Permittee shall, to the extent practicable, continue to operate, and maintain the *baghouses*, in accordance with vendor specifications *to control emissions associated with the storage silos, cyclones, classifiers, and during the loading and unloading of flyash into trucks and railcars*. If vendor specifications are not available, the Permittee shall develop and implement procedures for the proper operation and maintenance of each baghouse. A copy of the vendor specifications or the operation and maintenance plan shall be kept on site and made available to ADEQ upon request.

[A.A.C. R18-2-306.A.2 and -331.A.3.e]
[Material permit conditions are indicated by underline and italics]

D. Monitoring and Recordkeeping Requirements

1. Baghouse Stack Opacity

A certified EPA Reference Method 9 observer shall conduct a monthly survey of visible emissions emanating from the stacks of the baghouses controlling the silos, cyclones, and classifiers when the baghouses are in operation as per Condition I.A.2 of Attachment "B".

2. The Permittee shall keep a log of all maintenance activities performed on the baghouses.

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

E. Permit Shield

Compliance with the terms of this Section shall be deemed compliance with the following applicable requirements: A.A.C. R18-2-702.B, 730.A.1.b, and B.

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

III. FUGITIVE DUST REQUIREMENTS

A. Applicability

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

B. Particulate Matter and Opacity

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

1. Emission Limitations/Standards

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

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

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

(1) Keep dust and other types of air contaminants to a minimum in an open area where construction operations, repair operations, demolition activities, clearing operations, leveling operations, or any earth moving or excavating activities are taking place, by good modern practices such as using an approved dust suppressant or adhesive soil stabilizer, paving, covering, landscaping, continuous wetting, detouring, barring access, or other acceptable means;

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

(2) Keep dust to a minimum from driveways, parking areas, and vacant lots where motor vehicular activity occurs by using an approved dust suppressant, or adhesive soil stabilizer, or by

paving, or by barring access to the property, or by other acceptable means;

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

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

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

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

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

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

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

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

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

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

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

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

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

2. Air Pollution Control Requirements

Haul Roads and Storage Piles

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

[A.A.C. R18-2-306.A.2 and -331.A.3.d]
[Material Permit Condition is indicated by underline and italics]

3. Monitoring and Recordkeeping Requirements

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

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

C. Permit Shield

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

IV. OTHER PERIODIC ACTIVITIES

A. Abrasive Blasting

1. Particulate Matter and Opacity

a. Emission Limitations/Standards

(1) 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:

(2) Wet blasting;

(3) Effective enclosures with necessary dust collecting equipment; or

(4) Any other method approved by the Director.

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

b. Opacity

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

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

2. Monitoring and Recordkeeping Requirement

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

a. The date the project was conducted;

b. The duration of the project; and

c. Type of control measures employed.

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

3. Permit Shield

Compliance with this Section shall be deemed compliance with A.A.C. R18-2-702.B.3 and -726.

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

B. Use of Paints

1. Volatile Organic Compounds

a. Emission Limitations/Standards

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

(2) 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]

(3) 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]

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

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

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

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

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

(5) 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 IV.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) 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 IV.B.1.b(1).

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

c. Permit Shield

(1) Compliance with this Section shall be deemed compliance with A.A.C.R18-2-727.

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

2. Opacity

a. Emission Limitation/Standard

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

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

b. Permit Shield

Compliance with the conditions of this Section shall be deemed compliance with A.A.C.R18-2-702.B.3.

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

C. Demolition/Renovation - Hazardous Air Pollutants

1. Emission Limitation/Standard

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

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

2. Monitoring and Recordkeeping Requirement

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

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

3. Permit Shield

Compliance with the conditions of this Section shall be deemed compliance with A.A.C. R18-2-1101.A.12.

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

ATTACHMENT "C": EQUIPMENT LIST

Air Quality Control Permit No. 75241 for
Phoenix Cement Company- Cholla Fly Ash

EQUIPMENT TYPE	MAX. CAPACITY	MAKE	MODEL	EQUIPMENTNUMBER	DATE OF MFG.
Raw Feed Dust Collector	16,000 CFM	General Electric	154-6-12P	001	1985
Nuisance Dust Collector	10,000 CFM	General Electric	126-6-12P	002	1985
Classifier	25 TPH	Buell	C66-33	004	1985
Classifier	25 TPH	Buell	C66-33	005	1985
Cyclone	25 TPH	Buell	2B-58G43A	006	1985
Cyclone	25 TPH	Buell	2B-58G43A	007	1985
Raw Feed Silo	475 Ton	Shuff Steel	Custom Built	Attached to Dust Collector EQ ID 001	1983
Product Silo	623 Ton	Shuff Steel	Custom Built	Attached to Dust Collector EQ ID 002	1983
Product Dust Collector	21,000 CFM	IAC	144TB-BHWT-320	008	2011
Loadout Dust Collector	3,000 CFM	NA	NA	003	1973

APPENDIX B

PROCESS DESCRIPTION

INTRODUCTION

Phoenix Cement Company (PCC) is applying to renew the Class II Air Permit (#75241) for its Cholla Facility. To meet the requirements of Arizona Administrative Code (AAC) Appendix 1 of Title 18, this Process Description and Supplemental Information is being submitted as part of the Cholla permit renewal application.

Please note that equipment ID 008 - 21,000 acfm Product Dust Collector was removed from the facility in November of 2020 due to the decrease in air handling requirements resulting from the decrease in fly ash from the shutdown of Cholla Units 2 and 4. This was noted in the Annual Log of Facility Changes reviewed by ADEQ 6/9/2021.

PROCESS DESCRIPTION

The PCC Cholla Facility is located in Navajo County within the APS Cholla Power Plant near Joseph City, Arizona. A Process Flow Diagram of site activities is provided in Attachment C. A Site Map showing the facility's location is provided in Attachment D.

A description of the process at the Cholla Facility is as follows:

- Raw flyash is pneumatically transferred from the APS Cholla Power Plant into either the raw feed silo or the product silo where it is stored.

- The flyash that is in the raw feed silo can then be pneumatically transferred to a classification system where the flyash that is a viable product is separated. The portion of the flyash that is not a viable product is then transferred back to the APS Cholla Power Plant.

- The flyash that is a viable product ends up in the product silo. This flyash is then pneumatically transferred to trucks for distribution.

EMISSIONS

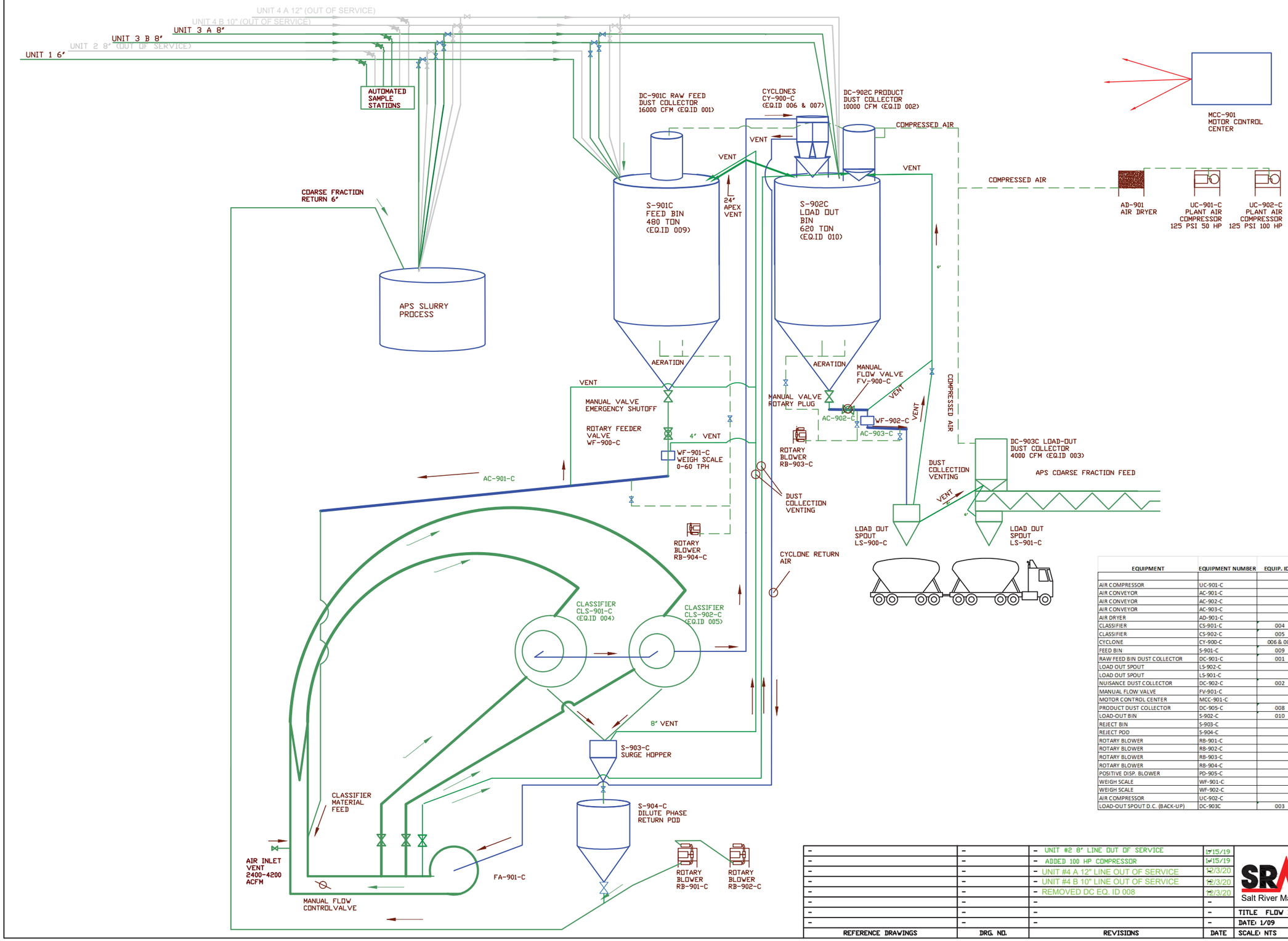
Attached to this permit renewal application as Attachment E are the source emissions and summary of emissions for the Cholla Facility. The emission calculations include maximum emissions rates for process equipment, and outline the maximum operating schedule for the equipment. Also included are air pollution controls that have been implemented to reduce point source emissions from activities at the facility.

APPLICABLE REQUIREMENTS

Processes occurring at the facility are subject to AAC R18-2-522 (renumbered R18-2-722). This facility meets all applicable requirements under this section (a Compliance Certification and Plan provided as Attachment F).

APPENDIX C

PROCESS FLOW DIAGRAM



EQUIPMENT	EQUIPMENT NUMBER	EQUIP. ID. #	SERIAL	SIZE/RATING
AIR COMPRESSOR	UC-901-C			
AIR CONVEYOR	AC-901-C			
AIR CONVEYOR	AC-902-C			
AIR CONVEYOR	AC-903-C			
AIR DRYER	AD-901-C			
CLASSIFIER	CS-901-C	004		
CLASSIFIER	CS-902-C	005		
CYCLONE	CY-900-C	006 & 007		
FEED BIN	S-901-C	009		
RAW FEED BIN DUST COLLECTOR	DC-901-C	001		
LOAD OUT SPOUT	LS-902-C			
LOAD OUT SPOUT	LS-901-C			
NUISANCE DUST COLLECTOR	DC-902-C	002		
MANUAL FLOW VALVE	FV-901-C			
MOTOR CONTROL CENTER	MCC-901-C			
PRODUCT DUST COLLECTOR	DC-905-C	008		
LOAD-OUT BIN	S-902-C	010		
REJECT BIN	S-903-C			
REJECT POD	S-904-C			
ROTARY BLOWER	RB-901-C			
ROTARY BLOWER	RB-902-C			
ROTARY BLOWER	RB-903-C			
ROTARY BLOWER	RB-904-C			
POSITIVE DISP. BLOWER	PD-905-C			
WEIGH SCALE	WF-901-C			
WEIGH SCALE	WF-902-C			
AIR COMPRESSOR	UC-902-C			
LOAD-OUT SPOUT D.C. (BACK-UP)	DC-903C	003		

REFERENCE DRAWINGS	DRG. NO.	REVISIONS	DATE
-	-	- UNIT #2 8' LINE OUT OF SERVICE	1/15/19
-	-	- ADDED 100 HP COMPRESSOR	1/15/19
-	-	- UNIT #4 A 12" LINE OUT OF SERVICE	12/3/20
-	-	- UNIT #4 B 10" LINE OUT OF SERVICE	12/3/20
-	-	- REMOVED DC EQ. ID 008	12/3/20
-	-	-	-
-	-	-	-
-	-	-	-

SRMG Salt River Materials Group

CHOLLA POZZOLAN FACILITY
JOSEPH CITY AZ
928-288-1661

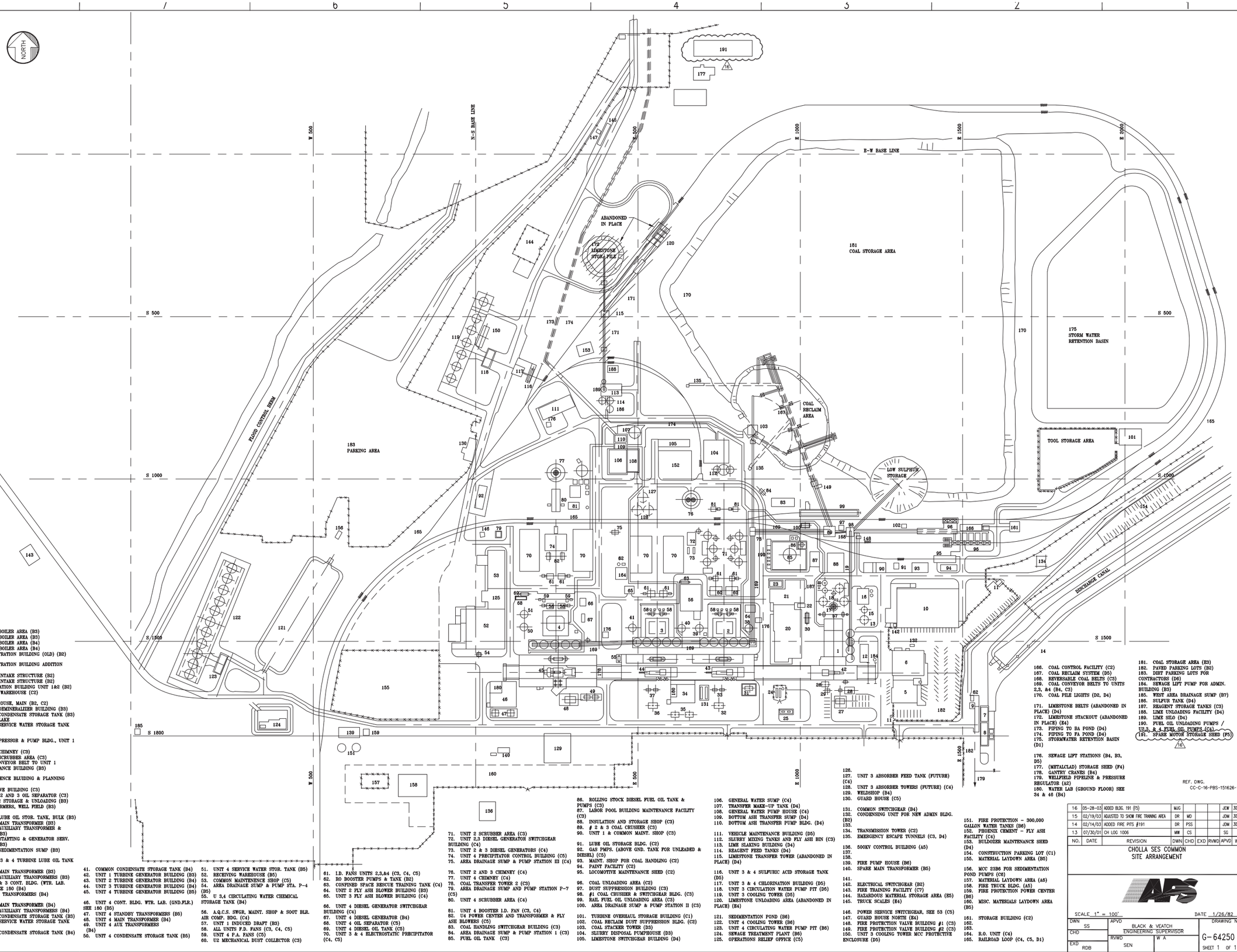
TITLE FLOW DIAGRAM

DATE: 1/09 | DRAWN BY RPB | DRAWING NO. CLC-90001

SCALE: NTS | CHECKED-BY JJ

APPENDIX D

SITE MAP



1. UNIT 1 BOILER AREA (B3)
2. UNIT 2 BOILER AREA (B3)
3. UNIT 3 BOILER AREA (B4)
4. UNIT 4 BOILER AREA (B4)
5. ADMINISTRATION BUILDING (OLD) (B2)

6. ADMINISTRATION BUILDING ADDITION (NEW) (B2)
7. UNIT 1 INTAKE STRUCTURE (B2)
8. UNIT 2 INTAKE STRUCTURE (B2)
9. CHLORINATION BUILDING UNIT 1&2 (B2)
10. ISSUING WAREHOUSE (C2)

11. GUARD HOUSE, MAIN (B2, C2)
12. UNIT 1 DEMINERALIZER BUILDING (B3)
13. UNIT 1 CONDENSATE STORAGE TANK (B3)
14. CHOLLA LAKE
15. UNIT 1 SERVICE WATER STORAGE TANK (C3)

16. AIR COMPRESSOR & PUMP BLDG., UNIT 1 (C3)
17. UNIT 1 CHIMNEY (C3)
18. UNIT 1 SCRUBBER AREA (C3)
19. COAL CONVEYOR BELT TO UNIT 1
20. MAINTENANCE BUILDING (B3)

21. MAINTENENCE BLUIDING & PLANNING OFFICE (C3)
22. MICROWAVE BUILDING (C3)
23. UNIT 1, 2 AND 3 OIL SEPARATOR (C3)
24. H2 & N2 STORAGE & UNLOADING (B3)
25. TRANSFORMERS, WELL FIELD (B3)

26. UNIT 1 LUBE OIL STOR. TANK, BULK (B3)
27. UNIT 1 MAIN TRANSFORMER (B3)
28. UNIT 1 AUXILIARY TRANSFORMER & SWITCHGEAR (B3)
29. UNIT 1 STARTING & GENERATOR SERV. SWITCHGEAR (B3)
30. UNIT 1 SEDIMENTATION SUMP (B3)

31. UNIT 2, 3 & 4 TURBINE LUBE OIL TANK (B3)
32. UNIT 2 MAIN TRANSFORMER (B3)
33. UNIT 2 AUXILIARY TRANSFORMERS (B3)
34. UNIT 2 & 3 CONT. BLDG. (WTR. LAB. GND. FLR.) SEE 180 (B4)
35. STANDBY TRANSFORMERS (B4)

36. UNIT 3 MAIN TRANSFORMER (B4)
37. UNIT 3 AUXILIARY TRANSFORMERS (B4)
38. UNIT 2 CONDENSATE STORAGE TANK (B3)
39. UNIT 2 SERVICE WATER STORAGE TANK (B4)
40. UNIT 3 CONDENSATE STORAGE TANK (B4)

41. COMMON CONDENSATE STORAGE TANK (B4)
42. UNIT 1 TURBINE GENERATOR BUILDING (B3)
43. UNIT 2 TURBINE GENERATOR BUILDING (B4)
44. UNIT 3 TURBINE GENERATOR BUILDING (B4)
45. UNIT 4 TURBINE GENERATOR BUILDING (B5)

46. UNIT 4 CONT. BLDG. WTR. LAB. (GND.FLR.) SEE 180 (B5)
47. UNIT 4 STANDBY TRANSFORMERS (B5)
48. UNIT 4 MAIN TRANSFORMER (B4)
49. UNIT 4 AUX TRANSFORMERS (B4)
50. UNIT 4 CONDENSATE STORAGE TANK (B5)
51. UNIT 4 SERVICE WATER STOR. TANK (B5)
52. RECEIVING WAREHOUSE (B5)
53. COMMON MAINTENENCE SHOP (C5)
54. AREA DRAINAGE SUMP & PUMP STA. P-4 (B5)
55. U 3,4 CIRCULATING WATER CHEMICAL STORAGE TANK (B4)
56. A.Q.C.S. SWGR, MAINT. SHOP & SOOT BLR. AIR COMP. BDG. (C4)
57. UNIT 1 INDUCED DRAFT (B3)
58. ALL UNITS F.D. FANS (C3, C4, C5)
59. UNIT 4 P.A. FANS (C5)
60. U2 MECHANICAL DUST COLLECTOR (C3)

61. I.D. FANS UNITS 2,3,&4 (C3, C4, C5)
62. RO BOOSTER PUMPS & TANK (B2)
63. CONFINED SPACE RESCUE TRAINING TANK (C4)
64. UNIT 2 FLY ASH BLOWER BUILDING (B3)
65. UNIT 3 FLY ASH BLOWER BUILDING (C4)

66. UNIT 4 DIESEL GENERATOR SWITCHGEAR BUILDING (C4)
67. UNIT 4 DIESEL GENERATOR (B4)
68. UNIT 4 OIL SEPARATOR (C5)
69. UNIT 4 DIESEL OIL TANK (C5)
70. UNIT 3 & 4 ELECTROSTATIC PRECIPITATOR (C4, C5)

71. UNIT 2 SCRUBBER AREA (C3)
72. UNIT 2,3 DIESEL GENERATOR SWITCHGEAR BUILDING (C4)
73. UNIT 2 & 3 DIESEL GENERATORS (C4)
74. UNIT 4 PRECIPITATOR CONTROL BUILDING (C5)
75. AREA DRAINAGE SUMP & PUMP STATION III (C4)

76. UNIT 2 AND 3 CHIMNEY (C4)
77. UNIT 4 CHIMNEY (C4)
78. COAL TRANSFER TOWER 2 (C3)
79. AREA DRAINAGE SUMP AND PUMP STATION P-7 (C5)
80. UNIT 4 SCRUBBER AREA (C4)

81. UNIT 4 BOOSTER I.D. FAN (C3, C4)
82. U4 POWER CENTER AND TRANSFORMER & FLY ASH BLOWERS (C5)
83. COAL HANDLING SWITCHGEAR BUILDING (C3)
84. AREA DRAINAGE SUMP & PUMP STATION 1 (C3)
85. FUEL OIL TANK (C3)

86. ROLLING STOCK DIESEL FUEL OIL TANK & PUMPS (C3)
87. LABOR POOL BUILDING MAINTENANCE FACILITY (C3)
88. INSULATION AND STORAGE SHOP (C3)
89. #2 & 3 COAL CRUSHER (C3)
90. UNIT 1 & COMMON MAINT. SHOP (C3)

91. LUBE OIL STORAGE BLDG. (C2)
92. GAS PMPS. (ABOVE GND. TANK FOR UNLEADED & DIESEL) (C5)
93. MAINT. SHOP FOR COAL HANDLING (C2)
94. PAINT FACILITY (C2)
95. LOCOMOTIVE MAINTENANCE SHED (C2)

96. COAL UNLOADING AREA (C2)
97. DUST SUPPRESSION BUILDING (C3)
98. #1 COAL CRUSHER & SWITCHGEAR BLDG. (C3)
99. RAIL FUEL OIL UNLOADING AREA (C3)
100. AREA DRAINAGE SUMP & PUMP STATION II (C3)

101. TURBINE OVERHAUL STORAGE BUILDING (C1)
102. COAL RECLAIM DUST SUPPRESSION BLDG. (C2)
103. COAL STACKER TOWER (D3)
104. SLURRY DISPOSAL PUMPHOUSE (D3)
105. LIMESTONE SWITCHGEAR BUILDING (D4)

106. GENERAL WATER SUMP (C4)
107. TRANSFER MAKE-UP TANK (D4)
108. GENERAL WATER PUMP HOUSE (C4)
109. BOTTOM ASH TRANSFER SUMP (D4)
110. BOTTOM ASH TRANSFER PUMP BLDG. (D4)

111. VEHICLE MAINTENANCE BUILDING (D5)
112. SLURRY MIXING TANKS AND FLY ASH BIN (C3)
113. LIME SLAKING BUILDING (D4)
114. REAGENT FEED TANKS (D4)
115. LIMESTONE TRANSFER TOWER (ABANDONED IN PLACE) (D4)

116. UNIT 3 & 4 SULFURIC ACID STORAGE TANK (D5)
117. UNIT 3 & 4 CHLORINATION BUILDING (D5)
118. UNIT 3 CIRCULATION WATER PUMP PIT (D5)
119. UNIT 3 COOLING TOWER (D5)
120. LIMESTONE UNLOADING AREA (ABANDONED IN PLACE) (E4)

121. SEDIMENTATION POND (B6)
122. UNIT 4 COOLING TOWER (B6)
123. UNIT 4 CIRCULATING WATER PUMP PIT (B6)
124. SEWAGE TREATMENT PLANT (B6)
125. OPERATIONS RELIEF OFFICE (C5)

126.
127. UNIT 3 ABSORBER FEED TANK (FUTURE) (C4)
128. UNIT 3 ABSORBER TOWERS (FUTURE) (C4)
129. WELDSHOP (B4)
130. GUARD HOUSE (C5)

131. COMMON SWITCHGEAR (B4)
132. CONDENSING UNIT FOR NEW ADMIN BLDG. (B2)
133.
134. TRANSMISSION TOWER (C2)
135. EMERGENCY ESCAPE TUNNELS (C3, D4)

136. 500KV CONTROL BUILDING (A5)
137.
138.
139. FIRE PUMP HOUSE (B6)
140. SPARE MAIN TRANSFORMER (B5)

141.
142. ELECTRICAL SWITCHGEAR (B2)
143. FIRE TRAINING FACILITY (C7)
144. HAZARDOUS MATERIAL STORAGE AREA (E5)
145. TRUCK SCALES (B4)

146. POWER SERVICE SWITCHGEAR, SEE 53 (C5)
147. GUARD HOUSE NORTH (E4)
148. FIRE PROTECTION VALVE BUILDING #1 (C3)
149. FIRE PROTECTION VALVE BUILDING #2 (C3)
150. UNIT 3 COOLING TOWER MCC PROTECTIVE ENCLOSURE (D5)

151. FIRE PROTECTION - 300,000 GALLON WATER TANKS (B6)
152. PHOENIX CEMENT - FLY ASH FACILITY (C4)
153. BULDOZER MAINTENANCE SHED (D4)
154. CONSTRUCTION PARKING LOT (C1)
155. MATERIAL LAYDOWN AREA (B5)

156. MCC 2&B6 FOR SEDIMENTATION POND PUMPS (C6)
157. MATERIAL LAYDOWN AREA (A5)
158. FIRE TRUCK BLDG. (A5)
159. FIRE PROTECTION POWER CENTER (B6)
160. MISC. MATERIALS LAYDOWN AREA (B5)

161. STORAGE BUILDING (C2)
162.
163.
164. R.O. UNIT (C4)
165. RAILROAD LOOP (C4, C5, D1)

166. COAL CONTROL FACILITY (C2)
167. COAL RECLAIM SYSTEM (D5)
168. REVERSABLE COAL BELTS (C3)
169. COAL CONVEYOR BELTS TO UNITS 2,3, &4 (B4, C3)
170. COAL PILE LIGHTS (D2, D4)

171. LIMESTONE BELTS (ABANDONED IN PLACE) (D4)
172. LIMESTONE STACKOUT (ABANDONED IN PLACE) (E4)
173. PIPING TO BA POND (D4)
174. PIPING TO FA POND (B4)
175. STORMWATER RETENTION BASIN (D1)

176. SEWAGE LIFT STATIONS (B4, B3, D5)
177. (METALCLAD) STORAGE SHED (F4)
178. GANTRY CRANES (B4)
179. WELLFILD FIPELINE & PRESSURE REGULATOR (A2)
180. WATER LAB (GROUND FLOOR) SEE 34 & 46 (B4)

181. COAL STORAGE AREA (E3)
182. PAVED PARKING LOTS (B2)
183. DIRT PARKING LOTS FOR CONTRACTORS (D6)
184. SEWAGE LIFT PUMP FOR ADMIN. BUILDING (B3)
185. WEST AREA DRAINAGE SUMP (B7)
186. SULFUR TANK (D4)
187. REAGENT STORAGE TANKS (C3)
188. LIME UNLOADING FACILITY (D4)
189. LIME SILO (D4)
190. FUEL OIL UNLOADING PUMPS / U2,3, & 4 FUEL OIL PUMPS (C4)
191. SPARE MOTOR STORAGE SHED (F5) 16

REF. DWG. CC-C-16-PBS-151626-1

NO.	DATE	REVISION	DWN	CHD	EXD	RVWD	APVD	W.A.
16	05-28-03	ADDED BLDG. 191 (F5)	MJG				JEW	30-9327
15	02/19/03	ADJUSTED TO SHOW FIRE TRAINING AREA	DR	MD			JDM	30-6876
14	02/14/03	ADDED FIRE PITS #191	DR	PSS			JDM	30-6876
13	07/30/01	CH LOG 1006	MW	CS			SG	

CHOLLA SES COMMON SITE ARRANGEMENT

APS

SCALE 1" = 100' DATE 1/26/82

DWN	APVD		DRAWING NO.
SS	BLACK & VEATCH ENGINEERING SUPERVISOR		G-64250
CHD	RVWD	W A	
EXD RDB	SEN		SHEET 1 OF 1

CC-C-16-PBS-64250-1.DWG

APPENDIX E

EMISSIONS CALCULATIONS

Phoenix Cement Company - Cholla Facility
Emissions Calculations

Time	Dust	Air Flow	PM	PM10	PM	PM10	PM	PM10
	Collector	Rate						
hours	ID	acfm	grains/acf	grains/acf	lbs/hr	lbs/hr	tons/yr	tons/yr
8760	1	16000	0.02	0.02	2.74	2.74	12.01	12.01
8760	2	10000	0.02	0.02	1.71	1.71	7.51	7.51
8760	3	4000	0.02	0.02	0.69	0.69	3.00	3.00
							22.53	22.53

Emissions calculations are based upon a maximum available production time of 8,760 hours per year.
These calculations also reflect loggged changes at the facility over the duration of the permit.

APPENDIX F

COMPLIANCE PLAN

INTRODUCTION

Phoenix Cement Company (PCC) is applying to renew the Class II Air Permit (#75241) for its Cholla Facility located at the APS Cholla Power Plant near Joseph City, Arizona. To meet the requirements of Arizona Administrative Code (AAC) R18-2-304(B), this Compliance Certification and Plan is being submitted as part of the Cholla permit renewal application. AAC R18-2-304(B) requires submittal of all information required by "Filing Instructions" as shown in Appendix 1 of AAC Title 18. Appendix 1 includes a requirement that a Compliance Certification be supplied with the application. The Compliance Certification must include the following:

- Identification of the applicable requirements which are the basis of the certification;
- A statement of methods used for determining compliance, including a description of monitoring, recordkeeping, and reporting requirements and test methods;
- A schedule for submission of compliance certifications during the permit term to be submitted no less frequently than annually, or more frequently if specified by the underlying applicable requirement or by the permitting authority; and
- A statement indicating the source's compliance status with any applicable enhanced monitoring and compliance certification requirements.

APPLICABLE REQUIREMENTS

Applicable emission limits and other requirements are described below.

Particulate Emission Standards

Under the requirements of AAC R18-2-722, particulate matter (PM) emissions from the processes may not exceed the value determined by the following equation:

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

Where E = the maximum allowable particulate emission rate in pounds per hour (lb/hr), and

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

Based on the maximum throughput rates defined in the process emission calculations also attached to this permit renewal application, the maximum allowable PM emission rate will not be exceeded based on this equation.

In addition, the gases discharged from these affected sources may not exceed the 20 percent opacity standard in R18-2-702.B.1.

Other Applicable Requirements

Daily records will be maintained for the production rates of material produced. Monitoring devices shall be calibrated and maintained and have an accuracy of +/- 5% over their operating range.

COMPLIANCE DETERMINATION

There are no applicable sources as required under R18-2-722 (H) 1 and 2 that will require compliance testing..

COMPLIANCE CERTIFICATIONS SCHEDULE

PCC is submitting this compliance certification with this Class II Permit Renewal Application, and will submit a compliance certification once every year during the term of the operating permit.

COMPLIANCE PLAN

This Compliance Plan is being submitted with this Class II Permit Renewal Application to meet the requirements of AAC R18-2-304(B), which requires submittal of all information required by "Filing Instructions" as shown in Appendix 1 of AAC Title 18. Appendix 1 of Title 18 includes a requirement that a Compliance Plan be supplied with the application. The Compliance Plan must include:

- A description of the compliance status of the source with respect to all applicable requirements,
- A compliance schedule, and
- A schedule for submission of certified progress reports no less frequently than every 6 months for sources required to have a schedule of compliance to remedy a violation.

Compliance Status

Processes and process equipment are currently in compliance with all applicable requirements. For emission projections, compliance will be demonstrated through emission inventories as required by the Arizona Department of Environmental Quality.

Compliance Schedule

The compliance schedule, required as part of this Compliance Plan, must contain the following elements:

- For applicable requirements with which the source is in compliance, a statement that the source will continue to comply with such requirements;
- For applicable requirements that will become effective during the permit term, a statement that the source will meet such requirements on a timely basis; and
- A schedule of compliance for sources that are not in compliance with all applicable requirements at the time of permit issuance. Such a schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading

to compliance with any applicable requirements for which the source will be in noncompliance at the time of permit issuance.

Statements of Compliance

Processes and process equipment will continue to operate in compliance with all applicable requirements at the time of permit issuance and will continue to comply with applicable requirements.

For applicable requirements that will become effective during the permit term, Phoenix Cement Company will meet such requirements on a timely basis.

Compliance Schedule

The processes and process equipment operate in compliance with all applicable requirements; therefore, a compliance schedule is not necessary.

Progress Report Schedule

The processes and process equipment will operate in compliance with all applicable requirements; therefore, a progress report schedule is not necessary.

Certification of Truth, Accuracy, and Completeness

Based on information and belief formed after reasonable inquiry, the statements and information in this Compliance Certification and Compliance Plan are true, accurate, and complete.

Signed: Albert M Putzig

Printed Name: Albert Putzig

Title: Sr. Director, Regional Pozzolan Manufacturing & Operations

Date: September 19, 2023