

**DAVIS-MONTHAN AFB**  
**SIC CODE, MAJOR GROUP – ‘42’ SPECIAL WAREHOUSING AND STORAGE**  
**AIR QUALITY PERMIT 3000, TECHNICAL SUPPORT DOCUMENT (TSD)**

**I. GENERAL COMMENTS**

**A. Company Information**

1. Source Name: Davis-Monthan AFB  
SIC Code, Major Group – ‘42’ – Special Warehousing and Storage
2. Source Address: 3775 S. 5<sup>th</sup> Street, Tucson, AZ 85707

**B. Company Information**

Davis-Monthan AFB (DMAFB) currently operates under six (6) Class II/III air quality permits. It is considered a synthetic minor source of Hazardous Air pollutants (HAPs) and a true minor for all other pollutants. The activities and operations covered by this permit fall under the following standard industrial classification (SIC):

- SIC Code, Major Group – ‘42’ Special Warehousing and Storage
- North American Industry Classification System (NAICS): 493110

This TSD was updated for the renewal of the previous 5-year permit. The existing permit was issued on November 11, 2016, and expired November 10, 2021. DMAFB continues to operate under the expired permit pursuant to Pima Count Code (PCC) 17.13.010.J and submitted timely renewal applications on July 9, 2021.

The allowable HAPs emissions apply base-wide to sources under the common control of DMAFB and have been divided among the permits with corresponding concomitant monitoring and reporting in each permit as summarized in the following table.

<b>Allowable HAPs &amp; Voluntary Limits, Tons Per Year</b>	<b>Stationary Source Air Permits</b>
3.5	Permit #3000: DMAFB, Major Group – 42 – Special Warehousing and Storage
13.0	Permit #3001: DMAFB, Major Group – 45 – Transportation by Air
1.5	Permit #3002: DMAFB, Major Group – 49 – Electric, Gas, and Sanitary Services
1.5	Permit #3004: DMAFB, Major Group – 65 – Real Estate
1.5	Permit #3005: DMAFB, Major Group – 80 – Health Services
1.5	Permit #3006: DMAFB, Major Group – 97 – National Security
<b>22.5 TPY Total <sup>1</sup></b>	<b>Permit #'s 3000, 3001, 3002, 3004, 3005, 3006 <sup>1</sup></b>

<sup>1</sup> The HAPs emissions are limited fence-line to fence-line, in accordance with section 112 of the Act within the contiguous or adjacent areas under the common control of the DMAFB. In general, PDEQ considers individual military services including the National Guard, and the Department of Defense agencies not to be under common control, when taken collectively. National Guard units as well as Department of Defense agencies and their operations at DMAFB may be considered to be under separate control but are viewed as being under common control within each division. PDEQ also considers leased activities “or tenants” at DMAFB under separate control and therefore not regulated as part of DMAFB operations, whereas contract-for-service activities or contractor-operated activities are. Leased activities may be considered by PDEQ to be under common control when they also have a contract-for-service relationship and should be evaluated on a case-by-case basis. (See Footnote on Page 2, Ref. EPA Guidance Document).

### Permitting History

On May 9, 1995, the Pima County Department of Environmental Quality (PDEQ) received a Title V permit application from DMAFB. Later, in April 1996 DMAFB submitted a significant revision to establish voluntary and federally enforceable emission limits on hazardous air pollutants (HAPs) to remain below major source levels under Section 112 of the Act and within the meaning in PCC 17.04.340.A.128.b. This was done in part to avoid federally applicable requirements in 40 CFR Part 63, Subpart GG – National Emission Standards for Aerospace Manufacturing and Rework Facilities. As a result, PDEQ issued Permit # 1701 to DMAFB in August of 1998 limiting the HAP emissions to below major source levels and establishing DMAFB as a synthetic minor source of HAP.

In 2003, Davis-Monthan AFB continued to operate under Permit #1701 until the permit was renewed. At that time DMAFB submitted applications and a strategy to divide the operations and activities into functionally distinct industrial SIC Code Groupings, on the basis of the definition of a major stationary source under 40 CFR §70.2 and EPA Guidance.<sup>2</sup> PDEQ subsequently issued 7 separate synthetic minor stationary source permits for criteria air pollutants in June 2004 (Permit #'s 3000 – 3006), while maintaining the existing synthetic minor HAPs permit (Permit # 1701).

In December 2005, Permit # 3003 was terminated as a result of the removal of a lone diesel generator covered under the permit.

On May 28, 2009, DMAFB submitted a Title V application for the renewal and combination of the Criteria and HAPs permits into one permit. DMAFB later withdrew the Title V application on April 2, 2015, and reapplied on October 16, 2015, for synthetic minor permits under the functionally distinct industrial SIC Code Groupings.

On July 9, 2021, PDEQ received an application to renew the current permit.

### **C. Attainment Classification**

The DMAFB is located in an area that is in attainment for all pollutants.

## **II. SOURCE DESCRIPTION**

### **A. Process Description**

Davis-Monthan Air Force Base (DMAFB) is a key Air Combat Command (ACC) installation of the United States Air Force (USAF). The base is located approximately five miles south-southeast of downtown Tucson, Arizona. The 355th Fighter Wing (355 FW) is the host unit, providing medical, logistical, mission, and operational support to all assigned units. As the location of the USAF Materiel Command's 309th Aerospace Maintenance and Regeneration Group (AMARG), Davis-Monthan AFB is the aircraft boneyard for excess military and government aircraft. Davis-Monthan AFB is a large multi-faceted installation which is comparable in size and function to a small city. Specifically, the base has operations including, but not limited to retail markets, hospital and dental clinics, public works, warehouse facilities, utilities, recreational facilities, an airfield, maintenance operations, and auto/wood hobby shops.

The activities and operations covered by this permit are those stationary sources at Davis-Monthan AFB located at the 309<sup>th</sup> Aerospace Maintenance and Regeneration Group (309<sup>th</sup> AMRG) "facility" and its supporting units [309<sup>th</sup> Support Squadron (309<sup>th</sup> SPTS), the 576<sup>th</sup> Aerospace Maintenance and Regeneration Squadron (576<sup>th</sup> AMRS), the 577<sup>th</sup> Commodities Reclamation Squadron (577<sup>th</sup> CMRS) and the 578<sup>th</sup> Storage and Disposal Squadron (578<sup>th</sup> SDS)] which fall under the industrial classification SIC Code: Major Group 42 - Special Warehousing and Storage (NAICS 493190).

The permitted activities and operations at the facility include: aircraft engine testing, abrasive blasting operations, solvent degreasing/cleaning operations, stationary rotating machinery, fuel storage and dispensing facilities, and emissions from existing and new nonpoint sources (fugitive dust).

<sup>2</sup> Reference: EPA Guidance Document: Major Source Determinations for Military Installations under the Air Toxics, New Source Review, and Title V Operating Permit Programs of the Clean Air Act", dated August 2, 1996.

## **B. Operating Capacity and Schedule**

The operating schedule at the facility is not limited and the equipment is permitted for operation 7/days/week, 24 hours a day, 365 days a year subject to the fuel and hour limitations in the equipment list.

## **C. Air Pollution Control Equipment**

The fuel loading and dispensing facilities employ Stage I controls where applicable in compliance with Federal, State and Local requirements. Post combustion controls are not required on the aircraft engines or microturbines and are employed if needed or required to comply with federal requirements for internal combustion engines.

## **III. REGULATORY HISTORY**

DMAFB is currently in compliance with all Pima County Code requirements.

## **IV. EMISSIONS ESTIMATES**

DMAFB conducts activities and operations that have a potential to emit Hazardous Air Pollutants in excess of major source thresholds without voluntarily accepted emission limitations and operating restrictions in this and other permits to limit the HAPs emissions to less than major source levels (< 22.5 tons/year).

Emission estimates from gas turbine engine testing at DMAFB were derived using emission factors for the specific engine types developed and presented by the US Air Force in their guidance document "[Air Emissions Guide for Air Force Stationary Sources at US Air Force Installations](#)", dated June 2020 and information on the average amount of time engines are tested at each power level in accordance with procedures. An additional 50% allowance over the estimated amount of fuel combusted has been permitted to account for variations from the estimated amounts that may be combusted in these operations.

Emissions from enclosed surface coating operations are VOC limited rather than HAP limited. The source has demonstrated that the current usage levels projected to 8760 hour/year are currently below the major source threshold for VOC, and they are inherently limited. The estimates include allowances for surface coating operations and associated throughput limits or monitoring of emissions. Permitted coating and solvent limits to trigger enhanced monitoring were estimated using a conservative worst-case amount of VOC emitted per gallon of coating and solvent used.

In the previous permitting methodology, PDEQ used an overly conservative Gasoline Vapor HAPs/VOC ratio of 25% to estimate HAPs emissions from gasoline storage, loading and dispensing operations and did not provide a HAP limit with a general 10% allowance below the major source threshold. As presented in the NESHAP Gasoline Distribution Industry (Stage I) Document, PDEQ used a ratio higher than the maximum ratio of the samples tested that contained MTBE, which was approximately 4 times the average of 4.8% presented in Table C-4 of that document. Over time, the gasoline marketing industry has evolved away from use of MTBE, and modern fuel formulations have effectively reduced this ratio, now commonly estimated at 5.25% as presented in Volume III: Chapter 11 Gasoline Marketing (Stage 1 and II) Emission Inventory Improvement Program (EIIP). In this permit and other permits, PDEQ includes a general 10% allowance below the major source threshold. The HAPs/VOC ratio was calculated using the liquid composition data taken from EPA tanks 4.09d modeling software and the methods presented in section 7.1.4 of AP-42. The difference in the estimated emissions between the previous (25%) and current permitted (3.3%) base-wide fuel vapor HAPs/VOC ratios is approximately 1.6 tons, which remains below the 2.5-ton allowance (22.5 tpy HAPs) provided in the current permitting limits. For this reason, PDEQ has accepted the lower HAPs/VOC ratio of 3.3% proposed by DMAFB in the approved PTE document.

Emission estimates for external combustion (natural gas heaters), internal combustion (rotary and reciprocating engines), solvent cleaning units, and fuel loading, storage, and dispensing were derived using standard emission factors and methods from AP-42 Compilation of Air Pollution Emission Factors – Volume 1: Stationary and Area Sources. In accordance with the federal guidelines, the facility-wide PTE has been calculated using 100 hours for each emergency engine and 8,760 hours for non-emergency engine and/or microturbines.

Emissions estimates for miscellaneous chemical/materials issues were derived from current usage levels recorded in the materials inventory system used to track the mass of combined and individual HAP emitted from usage of HAP containing materials at the facility.

The following table outlines DMAFB's potential to emit pollutants:

<b>Controlled<sup>1</sup> Facility-Wide Potential Emissions of Pollutants (tons/yr)</b>									
<b>Conventional or Criteria Air Pollutant</b>								<b>NSPS</b>	<b>HAPs</b>
<b>PM<sub>2.5</sub></b>	<b>PM<sub>10</sub></b>	<b>PM</b>	<b>NO<sub>x</sub></b>	<b>VOC</b>	<b>CO</b>	<b>SO<sub>2</sub></b>	<b>Lead<sup>2</sup></b>	<b>N/A</b>	<b>Total</b>
1.49	1.58	1.58	20.17	< 90.00	35.66	1.32	Negligible	N/A	< 3.5

<sup>1</sup> Emergency generator engine potential to emit (PTE) is calculated on operation as an emergency generator (100 hour/year). Boiler PTE is calculated on unlimited operation when firing natural gas. Fuel storage and dispensing PTE is calculated on voluntary throughput limitations. PTE for VOC includes a 55 ton/year VOC emission cap for all enclosed surface coating operations. Facility-wide PTE for HAPs is limited by permit to less than 3.5 tons per year based max allowable operations and total miscellaneous chemical/materials use monitoring and reporting.+

## V. APPLICABLE REQUIREMENTS

### 40 CFR, Part 60 Standards of Performance for New Stationary Sources

Subpart A	General Provisions
Subpart IIII	Standards of Performance for Stationary Compression Ignition Engines
Appendix A	Test Methods

### 40 CFR, Part 63 National E missions Standards for Hazardous Air Pollutants for Source Categories

Subpart A	General Provisions
Subpart CCCCC	NESHAP for Gasoline Dispensing Facilities

### Pima County Code Title 17, Chapter 17.11 – General Provisions for Permits

<b>Article I –</b>	<b>General Provisions</b>
17.11.010	Statutory Authority.
17.11.020	Planning, Constructing, or Operating Without a Permit.
<b>Article II –</b>	<b>General Provisions for Stationary Source Permits</b>
17.11.060	Permit Display or Posting.
17.11.070	Public records – Confidentiality.
17.11.090	Applicability – Classes of permits.
17.11.100	Permits for State Delegated Emission Sources.
17.11.110	Portable Sources.
17.11.120	Material permit condition.
17.11.150	Stack height limitation.
17.11.160	Test methods and procedures.
17.11.190	Permits containing synthetic emission limitations and standards.
17.11.210	Performance tests.

### Pima County Code Title 17, Chapter 17.13 – Permits and Permit Revisions for Class II and III Permits

<b>Article I –</b>	<b>General Provisions</b>
17.13.010	Application processing procedures.
17.13.020	Permit contents.
17.13.070	Establishment of an emissions cap for Class II and Class III permits.

<b>Article II –</b>	<b>Permit Revisions, Renewals and Transfers for Class II and III Permits</b>
17.13.100	Facility changes that require a permit revision.
17.13.110	Procedures for certain changes that do not require a permit revision.
17.13.120	Administrative amendments for Class II and Class III permits.
17.13.130	Minor revisions.
17.13.140	Significant revisions.
17.13.150	Reopening, revocation, or termination.
<b>Article III –</b>	<b>Emissions for Class II and Class III Sources</b>
17.13.180	Annual Emissions inventory questionnaire.
17.13.190	Excess emissions reporting requirements.
<b>Article IV –</b> (Inclusive)	<b>Public Participation for Class II and III permits</b>
<b>Article V –</b>	<b>Fees for Class II and Class III Sources</b>
17.13.230	General Provisions.
17.13.240	Fees related to Class II and Class III permits.

#### **Pima County Code Title 17, Chapter 17.14 – Activity Permits**

<b>Article I –</b>	<b>General Provisions</b>
17.14.040.F.1	Fugitive dust activity permit (exemption)
17.14.060	Asbestos NESHAP activity permits.
17.14.080	Open burning permits.

#### **Pima County Code Title 17, Chapter 17.16 – Emission Limiting Standards**

<b>Article I –</b>	<b>General Provisions</b>
17.16.010	Local rules and standards; Applicability of more than one standard.
17.16.020	Noncompliance with applicable standards.
17.16.030	Odor limiting standards.
<b>Article II –</b>	<b>Visible Emission Standards</b>
17.16.040	Standards and applicability (includes NESHAP).
17.16.050	Visibility limiting standard.
17.16.060	Fugitive dust producing activities.
<b>Article III –</b>	<b>Emissions from Existing and Nonpoint Sources (Inclusive)</b>
<b>Article IV –</b>	<b>New and Existing Stationary Source Performance Standards</b>
17.16.130	Applicability
17.16.165	Standards of performance for fossil-fuel fired industrial and commercial equipment
17.16.230	Standards of performance for storage vessels of petroleum liquids
17.16.340	Standards of performance for stationary rotating machinery
17.16.400	Standards of performance for organic solvents and other organic materials
17.16.430	Standards of performance for unclassified sources
<b>Article V –</b>	<b>Emissions from New and Existing Portable Sources</b>
17.16.450 - 480	Emissions from New and Existing Portable Sources
<b>Article VI –</b>	<b>New Source Performance Standards</b>
17.16.490.A.1	NSPS – Subpart A – General Provisions
17.16.490.A.84	NSPS – Subpart IIII – Stationary Compression Ignition Engines
<b>Article VII –</b>	<b>National Emission Standards for Hazardous Air Pollutants</b>
17.16.530	NESHAP – Subpart A – General Provisions
17.16.530	NESHAP – Subpart CCCCCC – Gasoline Dispensing Facilities

## **Pima County Code Title 17, Chapter 17.20 – Emissions Source Testing and Monitoring**

### **Article I – General Provisions**

17.20.010 Source sampling, monitoring and testing

### **Article II – Concealment of Emissions**

17.20.040 Concealment of emissions

### **Article III – Compliance Inspections**

17.20.050 Compliance Inspections

## **Pima County Code Title 17, Chapter 17.24 – Emissions Source Recordkeeping and Reporting**

### **Article I – Availability of Information**

17.24.010 Confidentiality of trade secrets, sales data, and proprietary information

### **Article II – Recordkeeping Requirements**

17.24.020 Recordkeeping for compliance determination

### **Article III – Reporting Requirements**

17.24.050 Reporting as a permit requirement

17.24.060 Reporting for emission inventories

### **Article IV – Penalty for noncompliance (inclusive)**

## **Pima County Code Title 17, Chapter 17.28 – Violations and Conditional Orders**

### **Article I – Violations (inclusive)**

### **Article II – Conditional Orders (inclusive)**

### **Article III – Circumvention (inclusive)**

## **VI. REQUIREMENTS SPECIFICALLY IDENTIFIED AS NON-APPLICABLE**

- A. 40 CFR Part 63 NESHAP Subpart JJJJJ has been identified as non-applicable since the boilers will be operated as gas-fired boilers. Should the boilers switch to fuel oil use and become subject to Subpart JJJJJ in the oil firing subcategory as defined in 40 CFR 63.11237 a significant permit revision will be required and compliance with Subpart JJJJJ will be required within 180 days of the effective date of the fuel switch.
- B. In accordance with 40 CFR 63.6585(f)(3), NESHAP Subpart ZZZZ does not apply to institutional or commercial generators that are not contractually obligated for more than 15 hours a year for emergency demand response and operation where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage and are not operated for non-emergency purposes to supply power as part of a financial arrangement with another entity.

## **VII. PERMIT CHANGES and APPLICABILITY DETERMINATIONS**

### **A. Permit and Permit Summary:**

The Specific Conditions have been organized into permit sections specific to the equipment and emission source categories at the facility. Some conditions in the previous permit may no longer apply or not be included. Conditions in the previous permit relating to Woodworking operations have been determined to be insignificant and included in the insignificant activities list. PDEQ has also determined that the standards in PCC 17.16.400.C.5 for facilities engaged in the surface coating of miscellaneous metal parts does not apply to the operations at this facility and removed the conditions relating to this standard. Conditions for monitoring the emissions of HAPs from miscellaneous chemical/materials previously contained in Air Permit # 1701 were incorporated and added to the permit in conditions 21 and 37 of the permit. Standards and Conditions relating to portable sources have been added to Section 2 of the permit. A basic fugitive dust control plan and provisions has been added to Section 7 of the Permit.

**B. General Applicability (Section 1):**

This Section of the permit incorporates provisions relating to the statutory authority, permit classification, and provides a summary of the permitted facility sources and the organization of the permit sections.

**C. Permit-Wide Operations (Section 2):**

This Section incorporates facility wide provisions applicable to all sources at the facility and is used to streamline provisions applicable to the specific sources and operations in other Sections of the permit. The facility-wide provisions include the following: voluntary emission limitations, general control standards, materials handling standards, odor limiting standard, opacity limit, visibility limiting standard, authorization to conduct fugitive dust producing activities, portable sources, and requirements to obtain activity permits. This Section also includes the facility-wide provisions for monitoring, recordkeeping, reporting requirements, facility changes, and testing requirements.

**D. Special Warehousing Operations (Section 3):**

This Section contains voluntary emission limits conditions for aircraft engine testing, abrasive blasting operations, enclosed surface coating operations, solvent degreasing/cleaning operations, and miscellaneous chemical materials/issues.

**E. Fossil Fuel Fired Industrial and Commercial Equipment (Boilers and Heaters) (Section 4):**

This Section incorporates applicable PCC requirements and voluntary emission limits for boilers, heaters, and fuel fired equipment to avoid certain requirements in PCC 17.16.165, 40 CFR Part 60, NSPS Subpart Dc and 40 CFR Part 63, NESHAP Subpart JJJJJ for certain classes of boilers. The specific applicability provisions for the boilers and heaters are included in Section 8 and indicated in the equipment list in Attachment 2.

The listed boilers and heaters in the equipment list are limited to firing natural gas. The specific definition for natural gas in this Section is taken from the NESHAP standard and is a broad definition that also includes LPG or Propane for use in temporary boilers or as an alternate fuel if required.

**F. Stationary Rotating Machinery (Section 5):**

This Section incorporates specific conditions for stationary rotating machinery. The permitted stationary rotating machinery or internal combustion engines are not subject to NSPS or NESHAP requirements. SIC Code – Major Group 42 falls within the industrial classification that is exempt from NESHAP area source rules provided they qualify for exemption in accordance with 40 CFR 63.6585(f)(3).

Note: **Section 5A** was added in the current permit to accommodate the requirements for emergency CI ICE subject to NSPS Subpart IIII as the old emergency engines are retired more units will be subject to NSPS Subpart IIII.

**G. Fuel Storage and Dispensing Facilities (Section 6):**

This Section incorporates voluntary emission limits for storage tanks and dispensing facilities including specific state and federal requirements for gasoline dispensing facilities.

**H. Emissions from Existing and New Nonpoint Sources (Section 7):**

Section 7 of this permit contains standards including reasonable precautions that apply to sources of fugitive dust or particulate matter which due to a lack of an identifiable emission point or plume are classified as nonpoint sources. These sources include but are not limited to equipment and activities employed during land clearing leveling, grading or trenching; motor vehicle operation on vacant lots and open areas; roads and streets; particulate material handling operations; and dust producing material storage piles.

**I. Specific Applicability Provisions (Section 8):**

This Section of the permit includes specific conditions on the applicability of permitted facility sources to the source categories, affected facilities, equipment, emission sources, installations, activities and operations at the facility and applicable operating limitations and requirements.

## VIII. Periodic Monitoring

This is a Class II permit and as such does not require the mandatory submittal of a semiannual summary report of required monitoring or an annual compliance certification to the Control Officer. The permit requires the facility to submit an annual report documenting compliance with the voluntary HAP limitations.

## IX. Control Technology Determination

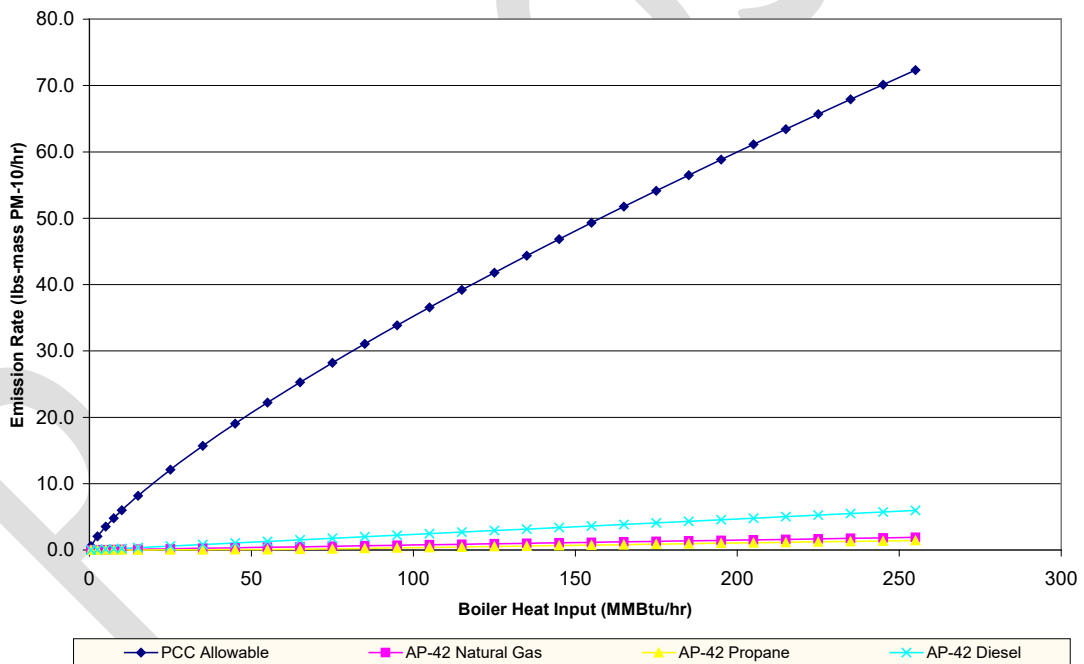
No technologies needed to be determined; the source is not subject to RACT, BACT or LAER.

## X. Exclusion of PCC Particulate Matter Discharge Rate Standards

The applicable PCC rules for the maximum particulate discharge rates are not normally included for Class II area source permits as explained below.

- For particulate matter sources, the calculated maximum particulate matter discharge rate, as provided in Title 17, yields maximum rates that far exceed the emissions expected from most typical area sources. For example, a 200 ton/hour process source, which is typical for an average construction aggregate, screening operation, would be limited to a maximum particulate matter discharge rate of 40.4 lbs/hour or 177 tons/year. This limit far exceeds estimated emissions from typical sources using EPA AP-42 emission factors and the source is far more likely to exceed opacity and visibility limiting standards well before reaching this limit.
- With regard to fuel burning equipment, PCC 17.16.165.C limits the emissions of particulate matter from commercial and industrial fossil-fuel fired equipment (including but not limited to boilers). This limit is not normally included in permits because allowable emissions are consistently over an entire order of magnitude higher than EPA AP-42 estimated potential emissions. The chart below, illustrates the point.

Comparison of Emissions of PM-10 for Boilers: PCC Allowable vs AP-42 Estimated



Comparative Chart of Allowable Particulate Emissions Under Pima County Code, Title 17, and Estimated Potential Emissions based on EPA AP-42 Estimates for External Combustion Sources. Allowable emissions are consistently over ten times estimated potential emissions. Therefore, it is not necessary to include the standard in the permit explicitly, but by reference in Attachment 1.

## **XI. Exclusion of PCC Sulfur Dioxide Emission Standards**

Compliance with the fuel sulfur limitation requirements in the permit shall ensure compliance with the Sulfur Dioxide Standards of PCC 17.16.165.E and PCC 17.16.340.F; which limit the emission of SO<sub>2</sub> to 1.0 pound per million BTU of heat input when burning low sulfur fuel. The definition of low sulfur fuel (PCC 17.04.340.A. “Low Sulfur Fuel”) is fuel oil containing less than 0.9 percent sulfur by weight. “High Sulfur Fuel” is defined as fuel oil containing 0.9% wt. or more Sulfur. In accordance with EPA AP-42 Appendix A, page A-5, the heating value of diesel fuel is estimated at 137,000 BTU per gallon. Thus, 1 million BTU of heat input is equivalent to 7.3 gallons of diesel. At 7.05 lbs per gallon, 51.47 lbs of diesel will produce 1 million BTU. At 0.9% 51.47 lbs of diesel contains 0.46 lbs of sulfur. Combined with Oxygen to form SO<sub>2</sub>, and assuming 100% of the sulfur in the fuel forms SO<sub>2</sub>, this would yield 0.92 lb SO<sub>2</sub> per 1MMBtu. Thus, low sulfur fuel oil will produce 0.92 lbs of SO<sub>2</sub> per million BTU of heat input. This is roughly 8% less than the prescribed 1.0-pound SO<sub>2</sub> per million BTU limit. An excess emissions report is required to be submitted to the control officer should the fuel oils fired in fuel burning equipment, to include non-NSPS / non-NESHAP rotating machinery, contain 0.9% wt. Sulfur or greater since the permit explicitly prohibits the use of high sulfur oil by the Permittee.

Jet fuel, natural gas, gasoline, and No. 1 and 2 distillate fuel oils and diesel delivered to Pima County consistently show sulfur levels below this limit as shown in fuel supplier certifications which verify the sulfur content of the fuel fired. The equipment specific sulfur content limitations in the permit and the prohibition to use high sulfur oil allow for the omission of PCC 17.16.165.E and PCC 17.16.340.F. These rules are incorporated by reference in Attachment 1 of the permit.

## **XI. Exclusion of PCC Per Gallon VOC limits in PCC 17.16.400.C.5**

PDEQ has determined that industrial coating of miscellaneous metal parts in accordance with PCC 17.400.C.5 does not apply to the Permittee because the facility does not meet the definition of such a facility under definitions in Title 17 and does not fall under SIC Code Major Groups 33 through 39.