



PERMIT

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY CLASS I PERMIT

COMPANY: *Eurofresh, Inc.*
FACILITY: *Greenhouse*
PERMIT #: *53618*
DATE ISSUED: *August 11, 2011*
EXPIRY DATE: *August 11, 2016*

SUMMARY

This Title V operating permit is issued to Eurofresh, Inc., the Permittee, for the continued operation of its greenhouse facility consisting of eighteen natural gas-fired boilers and twelve diesel-fired internal combustion engines (ICEs). The facility is located at Willcox in Graham County, Arizona.

The natural gas-fired boilers are each nominally rated from 35.87 to 41.74 MMBtu per hour. All the boilers are equipped with low-NO_x burners. The boilers are used for producing hot water to regulate the temperature within the greenhouses and provide additional carbon dioxide to the greenhouses. Eight of the boilers are dual-fired boilers capable of using diesel fuel. The ICEs provide power to the greenhouses during emergency situations. Eurofresh is a major source under the Title V program because emissions of nitrogen oxide (NO_x) exceed 100 tons per year (tpy). The definition of major source under the New Source Review program states that the PSD major source threshold is 100 tpy for a source classified as a categorical source and 250 tpy for a source not classified as a categorical source. The list of categorical sources, A.A.C. R 18-2-401(2), does not include greenhouses. Thus for Eurofresh's overall operation, the PSD major source threshold is 250 tpy. For supporting the greenhouses, Eurofresh has dual-fuel fired boilers (natural gas and diesel) at their facility. Since this support facility is a listed categorical source, the PSD threshold for the boilers is 100 tpy. The source has accepted limits on fuel usage to stay below 100 tpy of NO_x. The source has also accepted limits on the operation of ICEs to stay below the major source facility wide threshold of 250 tpy of NO_x. With the establishment of voluntarily accepted emission limitations, Eurofresh's facility-wide emissions will not exceed 250 tpy. Consequently, the Eurofresh's facility as a whole is not considered a PSD major source. The dual-fuel fired boilers have PTE for all criteria pollutants below 100 tpy. Consequently, it will not be considered a PSD major source. This permitting action involves a modification and will essentially reclassify the facility from a Class II synthetic minor status to a Class I non-PSD status. Since the source is not an existing PSD source undergoing a modification that is subject to NSR for any criteria pollutant, greenhouse (GHG) emissions are not required to be evaluated for applicability of PSD for GHGs. This permit is issued in accordance with Title 49, Chapter 3 of the Arizona Revised Statutes. 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. All terms and conditions in this permit are enforceable by the Administrator of the U.S. Environmental Protection Agency.

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ATTACHMENT "A": GENERAL PROVISIONS

**Air Quality Control Permit No. 53618
for
Eurofresh, Inc.**

I. PERMIT EXPIRATION AND RENEWAL [ARS § 49-426.F, A.A.C. R18-2-304.C.2, and -306.A.1]

- A. This permit is valid for a period of five years from the date of issuance.
- B. The Permittee shall submit an application for renewal of this permit at least 6 months, but not more than 18 months, prior to the date of permit expiration.

II. COMPLIANCE WITH PERMIT CONDITIONS [A.A.C. R18-2-306.A.8.a and b]

- A. The Permittee shall comply with all conditions of this permit including all applicable requirements of the Arizona air quality statutes and air quality rules. Any permit noncompliance constitutes a violation of the Arizona Revised Statutes and 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.
- 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.

III. PERMIT REVISION, REOPENING, REVOCATION AND REISSUANCE, OR TERMINATION FOR CAUSE [A.A.C. R18-2-306.A.8.c, -321.A.1.c-d, and -321.A.2]

- 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.
- B. The permit shall be reopened and revised under any of the following circumstances
 1. Additional applicable requirements under the Clean Air Act become applicable to the Class I source. Such a reopening shall only occur if there are three or more years remaining in the permit term. The reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless an application for renewal has been submitted pursuant to A.A.C. R18-2-322.B. Any permit revision required pursuant to this subparagraph shall comply with the provisions in A.A.C. R18-2-322 for permit renewal and shall reset the five-year permit term.
 2. Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the Class I permit.

3. 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.
 4. The Director or the Administrator determines that the permit needs to be revised or revoked to assure compliance with the applicable requirements.
- C. Proceedings to reopen and reissue 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, except for reopenings under Condition III.B.1 above, affect only those parts of the permit for which cause to reopen exists. Such reopenings shall be made as expeditiously as practicable. Permit reopenings for reasons other than those stated in Condition III.B.1 above shall not result in a resetting of the five-year permit term.

IV. POSTING OF PERMIT

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

- A. The Permittee shall post this permit or a certificate of permit issuance where the facility is located 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 listed in the permit to identify that piece of equipment.
- B. A copy of the complete permit shall be kept on site.

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.

VI. ANNUAL EMISSION INVENTORY QUESTIONNAIRE

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

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

VII. COMPLIANCE CERTIFICATION

[A.A.C. R18-2-309.2.a, -309.2.c-d, and -309.5.d]

- A. The Permittee shall submit a compliance certification to the Director semiannually which describes the compliance status of the source with respect to each permit condition. The certifications shall be submitted no later than May 15th and November 15th. The May 15th compliance certification shall report the compliance status of the source during the period between October 1st of the previous year and March 31st of the current year. The November 15th compliance certification shall report the compliance status of the source during the period between April 1st and September 30th of the current year.

The compliance certification shall include the following:

1. Identification of each term or condition of the permit that is the basis of the certification;
 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;
 3. The 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 certification shall be based on the methods or means designated in Condition VII.A.2 above. The certifications shall identify each deviation and take it into account for consideration in the compliance certification;
 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;
 5. All instances of deviations from permit requirements reported pursuant to Condition XII.B of this Attachment; and
 6. Other facts the Director may require determining the compliance status of the source.
- B.** A copy of all compliance certifications shall also be submitted to the EPA Administrator.
- C.** If any outstanding compliance schedule exists, a progress report shall be submitted with the semi-annual compliance certifications required in Condition VII.A above.

VIII. CERTIFICATION OF TRUTH, ACCURACY AND COMPLETENESS [A.A.C. R18-2-304.H]

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.

IX. INSPECTION AND ENTRY [A.A.C. R18-2-309.4]

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;
- B.** Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;

- C. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
- D. Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements; and
- E. Record any inspection by use of written, electronic, magnetic and photographic media.

X. PERMIT REVISION PURSUANT TO FEDERAL HAZARDOUS AIR POLLUTANT STANDARD [A.A.C. R18-2-304.C]

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.

XI. ACCIDENTAL RELEASE PROGRAM [40 CFR Part 68]

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.

XII. EXCESS EMISSIONS, PERMIT DEVIATIONS, AND EMERGENCY REPORTING

A. Excess Emissions Reporting [A.A.C. R18-2-310.01.A and B]

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:

i. 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.

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

b. The report shall contain the following information:

i. Identity of each stack or other emission point where the excess emissions occurred;

ii. 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;

- iii. Date, time and duration, or expected duration, of the excess emissions;
- iv. Identity of the equipment from which the excess emissions emanated;
- v. Nature and cause of such emissions;
- vi. 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; and
- vii. Steps taken to limit the excess emissions. 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.

- 2. In the case of continuous or recurring excess emissions, the notification requirements of this section 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

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

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. Prompt reporting shall mean that the report was submitted to the Director by certified mail, facsimile, or hand delivery within two working days of the time when emission limitations were exceeded due to an emergency or within two working days of the time when the owner or operator first learned of the occurrence of a deviation from a permit requirement.

C. Emergency Provision

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

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

3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - a. An emergency occurred and that the Permittee can identify the cause(s) of the emergency;
 - b. The permitted facility was being properly operated at the time;
 - 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
 - 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.
4. In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.

D. Compliance Schedule

[ARS § 49-426.1.5]

For any excess emission or permit deviation that cannot be corrected with 72 hours, the Permittee is required to submit a compliance schedule to the Director within 21 days of such occurrence. The compliance schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with the permit terms or conditions that have been violated.

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

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

1. Applicability

This rule 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;
- b. Promulgated pursuant to Titles IV or VI of the Clean Air Act;
- c. Contained in any Prevention of Significant Deterioration (PSD) or New Source Review (NSR) permit issued by the U.S. EPA;
- d. Contained in A.A.C. R18-2-715.F; or
- e. Included in a permit to meet the requirements of A.A.C. R18-2-406.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. 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;
- 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;
- 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;
- 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;
- e. All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;
- f. The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance;
- 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;
- 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;
- i. All emissions monitoring systems were kept in operation if at all practicable; and
- j. The Permittee's actions in response to the excess emissions were documented by contemporaneous records.

3. Affirmative Defense for Startup and Shutdown

- a. Except as provided in Condition XII.E.3.b 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:
- i. The excess emissions could not have been prevented through careful and prudent planning and design;
 - ii. 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;
 - iii. 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;
 - iv. The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;
 - v. All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;
 - vi. 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;
 - vii. All emissions monitoring systems were kept in operation if at all practicable; and
 - viii. Contemporaneous records documented the Permittee's actions in response to the excess emissions.
- 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.E.2 above.

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.E.2 above.

5. Demonstration of Reasonable and Practicable Measures

For an affirmative defense under Condition XII.E.2 or XII.E.3 above, the Permittee shall demonstrate, through submission of the data and information required by Condition XII.E and A.A.C. R18-2-310.01, that all reasonable and practicable measures within the Permittee's control were implemented to prevent the occurrence of the excess emissions.

XIII. RECORD KEEPING REQUIREMENTS

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

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

1. The date, place as defined in the permit, and time of sampling or measurements;
2. The date(s) analyses were performed;
3. The name of the company or entity that performed the analyses;
4. A description of the analytical techniques or methods used;
5. The results of such analyses; and
6. The operating conditions as existing at the time of sampling or measurement.

B. The Permittee shall retain records of all required monitoring data and support information for a period of at least 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.

C. All required records shall be maintained either in an unchangeable electronic format or in a handwritten logbook utilizing indelible ink.

XIV. REPORTING REQUIREMENTS

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

The Permittee shall submit the following reports:

- A.** Compliance certifications in accordance with Section VII of Attachment "A".
- B.** Excess emission; permit deviation, and emergency reports in accordance with Section XII of Attachment "A".
- 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. R18-2-306.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.G]

XVI. PERMIT AMENDMENT OR REVISION [A.A.C. R18-2-318, -319, and -320]

The Permittee shall apply for a permit amendment or revision for changes to the facility which do not qualify for a facility change without revision under Section XVII, as follows:

- A.** Administrative Permit Amendment (A.A.C. R18-2-318);
- B.** Minor Permit Revision (A.A.C. R18-2-319); and
- C.** Significant Permit Revision (A.A.C. R18-2-320).

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

XVII. FACILITY CHANGE WITHOUT A PERMIT REVISION [A.A.C. R18-2-306.A.4 and -317]

- A.** The Permittee may make changes at the permitted source without a permit revision if all of the following apply:

 - 1. The changes are not modifications under any provision of Title I of the Act or under ARS § 49-401.01(24);
 - 2. The changes do not exceed the emissions allowable under the permit whether expressed therein as a rate of emissions or in terms of total emissions;
 - 3. The changes do not violate any applicable requirements or trigger any additional applicable requirements;
 - 4. The changes satisfy all requirements for a minor permit revision under A.A.C. R18-2-319.A; and
 - 5. The changes do not contravene federally enforceable permit terms and conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements.

- B.** The substitution of an item of process or pollution control equipment for an identical or substantially similar item of process or pollution control equipment shall qualify as a change that does not require a permit revision, if it meets all of the requirements of Conditions XVII.A and XVII.C of this Attachment.
- C.** For each change under Conditions XVII.A and XVII.B above, a written notice by certified mail or hand delivery shall be received by the Director and the Administrator a minimum of 7 working days in advance of the change. Notifications of changes associated with emergency conditions, such as malfunctions necessitating the replacement of equipment, may be provided less than 7 working days in advance of the change, but must be provided as far in advance of the change as possible or, if advance notification is not practicable, as soon after the change as possible.
- D.** Each notification shall include:
 - 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.** The permit shield described in A.A.C. R18-2-325 shall not apply to any change made under this Section.
- F.** Except as otherwise provided for in the permit, making a change from one alternative operating scenario to another as provided under A.A.C. R18-2-306.A.11 shall not require any prior notice under this Section.
- 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, do not satisfy Condition XVII.A above.

XVIII. TESTING REQUIREMENTS

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

- A.** The Permittee shall conduct performance tests as specified in the permit and at such other times as may be required by the Director.
- B. Operational Conditions during Testing**

Tests shall be conducted during operation at the maximum possible capacity of each unit under representative operational conditions unless other conditions are required by the applicable test method or in this permit. With prior written approval from the Director, testing may be performed at a lower rate. Operations during periods of start-up, shutdown, and malfunction (as defined in A.A.C. R18-2-101) shall not constitute representative operational conditions unless otherwise specified in the applicable standard.

C. 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.

D. Test Plan

At least 14 calendar days prior to performing a test, the Permittee shall submit a test plan to the Director in accordance with A.A.C. R18-2-312.B and the Arizona Testing Manual. This test plan must include the following:

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:

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.

G. Report of Final Test Results

A written report of the results of all performance tests shall be submitted to the Director within 30 days after the test is performed. The report shall be submitted in accordance with the Arizona Testing Manual and A.A.C. R18-2-312.A.

XIX. PROPERTY RIGHTS [A.A.C. R18-2-306.A.8.d]

This permit does not convey any property rights of any sort, or any exclusive privilege.

XX. SEVERABILITY CLAUSE [A.A.C. R18-2-306.A.7]

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.

XXI. PERMIT SHIELD [A.A.C. R18-2-325]

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 any minor revisions pursuant to Condition XVI.C of this Attachment and any facility changes without a permit revision pursuant to Section XVII of this Attachment.

XXII. PROTECTION OF STRATOSPHERIC OZONE [40 CFR Part 82]

If this source becomes subject to the provisions of 40 CFR Part 82, then the Permittee shall comply with these provisions accordingly.

XXIII. GREENHOUSE GAS REPORTING [40 CFR Part 98]

The Permittee is subject to the provisions of 40 CFR Part 98 and shall comply with the provisions 40 CFR Part 98.

ATTACHMENT “B”: SPECIFIC CONDITIONS
Air Quality Control Permit # 53618 for
Eurofresh, Inc.

I. FACILITY WIDE REQUIREMENTS

- A. The Permittee shall have on site or on call a person certified in EPA Reference Method 9. [A.A.C. R18-2-306.A.3.c]
- B. At the time the 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 six-month compliance term. [A.A.C. R18-2-306.A.5.a]
- C. The Permittee shall keep a log of all emission related maintenance activities performed at the facility. [A.A.C. R18-2-306.A.3.c]

II. BOILERS

- A. **Applicability** [40 CFR § 60.40c]

This section is applicable to all the boilers listed in Equipment List, Attachment “C”.

- B. **Operating Limitations**

- 1. Fuel and Hours of Operation [A.A.C. R18-2-306.A.2, -306.01.A, -331.A.3.a and 40 CFR 63.11237]
[Material Permit Conditions are identified by italics and underlines]
 - a. *The Permittee shall not use any fuel other than pipeline quality natural gas. The Permittee shall burn liquid fuel only during periods of gas curtailment, gas supply emergencies, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year for each boiler.*
 - b. *The Permittee shall not burn more than a combined total of 2,050 MMSCF of natural gas in any rolling 12-month period in all the boilers.*
 - c. *The Permittee shall not fire diesel fuel for more than a combined total of 1,800 cumulative hours in any rolling 12-month period in all the boilers.*
- 2. Monitoring, Reporting & Record Keeping Requirements [Material Permit Conditions are identified by italics and underlines]
 - a. *The Permittee shall calibrate, maintain, and operate gas flow meter(s), one for each boiler, that continuously monitor and record the amount of natural gas combusted each day.* [A.A.C. R18-2-331A.3.c, 40 CFR 60.48c(g)]

- b. The Permittee shall calculate and record the daily natural gas used in each of the boilers of the facility. [40 CFR 60.48c(g), A.A.C. R18-2-306.A.3.c]
- c. On a monthly basis, the Permittee shall calculate and record the rolling 12-month total of natural gas used in the boilers of the facility to show compliance with Condition II.B.1.b above. [A.A.C. R18-2-306.A.3.c]
- d. The Permittee shall calculate and record daily the number of hours boilers have operated on diesel fuel during emergency and non-emergency conditions. [A.A.C. R18-2-306.A.3.c]
- e. On a monthly basis, the Permittee shall calculate and record the rolling 12-month total of hours boilers have operated on diesel fuel during emergency and non-emergency conditions to show compliance with Condition II.B.1.c above. [A.A.C. R18-2-306.A.3.c]
- f. The Permittee shall submit to the Director reports of the rolling 12-month total natural gas used by each boiler and all boilers combined and hours of operation of each boiler and all boilers combined during the each six month compliance period according to the schedule in Condition VII of Attachment "A". The reports shall be post marked by the 30th day following the end of reporting period.
[40 CFR 60.48.c.(j) and A.A.C. R18-2-306.A.3.c]

3. Permit Shield [A.A.C. R18-2-325]

Compliance with the conditions of this Section shall be deemed compliance with 40 CFR 60.40c(a), 60.48c(g), and 60.48c(j).

C. Nitrogen Oxides (NO_x)

- 1. Emission Limitations/Standards [A.A.C. R18-2-306.01 and -331.A.3.a]
[Material Permit Conditions are identified by italics and underlines]

While firing natural gas, the Permittee shall not cause, allow, or permit the emission of NO_x to exceed 62.32 pounds per million standard cubic feet of natural gas.

- 2. Air Pollution Control Equipment [A.A.C. R 18-2-306.A.2 and -331.A.3.e]
[Material Permit Conditions are identified by italics and underlines]

At all times including periods of start up, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate low- NO_x Burners on the boilers in a manner consistent with good air pollution control practice for minimizing NO_x emissions.

- 3. Monitoring, Reporting & Record Keeping Requirements

The Permittee shall keep records of the date and details of any low NO_x burner

tuning that is conducted.

[A.A.C. R18-2-306.A3.c]

4. Performance Testing Requirement [A.A.C. R18-2-312]
- a. Within 12 months of the most recent performance test, the Permittee shall conduct performance tests on one boiler at each of the six sites to determine compliance with the limits specified in Condition II.C.1 above.
 - b. Annually thereafter, the Permittee shall test one boiler from each site. The boiler to be tested shall be chosen by the Director at the time that a performance test plan is submitted.
 - c. The Permittee shall use EPA Reference Method 7 or 7E to determine NO_x emissions.

D. Sulfur Dioxide (SO₂)

1. Emission Limitations/Standards
 - a. The Permittee shall not combust diesel fuel that contains more than 0.5 weight percent sulfur. [40 CFR 60.42 c(d)]
 - b. The diesel fuel sulfur limit apply at all times, including periods of startup, shutdown, and malfunction. [40 CFR 60.42 c(i)]
2. Monitoring, Reporting & Record Keeping Requirements
 - a. When firing diesel fuel, the Permittee shall show compliance with the emission limit in Condition II.D.1.a by maintaining a copy of the certification from the fuel supplier, containing the information described in Conditions II.D.2.c below. [40 CFR 60.44c(h)(1)]
 - b. The Permittee shall submit semi-annual reports of fuel certification to the Director by July 30th for the reporting period January 1- June 30 and by January 30th for the reporting period July 1- December 31st. [40 CFR 60.48c(d) & (j)]
 - c. The report shall include: [40 CFR 60.48c(e)(11) & (f)(1)]
 - i. Name of the oil supplier;
 - ii. A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil;
 - iii. The sulfur content or maximum sulfur content of the oil;

- iv. A certified statement signed by the Permittee that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period.

- 3. Permit Shield [A.A.C. R18-2-325]

Compliance with Condition II.D shall be deemed compliance with 40 CFR 60.42 c(d) and (i), 60.44c(h)(1), 60.48c(d), (e)(11), (f)(1), and (j).

E. Opacity

- 1. Emission Limitation and Standard [40 CFR 60.43 c(c) & (d)]

- a. When firing diesel fuel, the Permittee shall not cause, allow or permit the opacity of any plume or effluent from any boiler to exceed 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity.

- b. The opacity standard in Condition II.E.1.a applies at all times, except during periods of startup, shutdown, or malfunction.

- 2. Monitoring, Recordkeeping, and Reporting

- a. A certified EPA Reference Method 9 observer shall conduct a monthly Method 9 evaluation of visible emissions emanating from the stack of each boiler while burning diesel fuel. [A.A.C. R18-2-306.A.3.c]

- b. The Permittee shall maintain records of the occurrence and duration of any startup, shutdown, malfunction, and monthly opacity readings in the operation of the boilers. [40 CFR 60.7(b)]

- 3. Permit Shield [A.A.C. R18-2-325]

Compliance with Condition II.E shall be deemed compliance with 40 CFR. 60.43c(c), (d), and 60.45c(a)(8).

III. INTERNAL COMBUSTION ENGINES (ICEs)

A. Applicability

This Section is applicable to the ICEs listed in Equipment List, Attachment “C”.

B. Operational Limitations

- 1. Fuel Limitation [A.A.C. R18-2-306.A.2]

The Permittee shall only use diesel fuel in the internal combustion engines.

2. Hours of Operation [A.A.C. R18-2-306.01 and 331.A.3.a]
[Material permit conditions are indicated by underline and italics]

The Permittee shall not operate the internal combustion engines for a combined total of more than 6,042,750 hp-hr in any rolling 12-month period.

3. Monitoring & Recordkeeping [A.A.C. R18-2-306.A.3.c]
- a. The Permittee shall show compliance with Condition III.B.2 by recording the monthly operating hp-hr at the end of each month for each of the generators and calculating a rolling 12-month hp-hr total for the ICEs.
- b. For purposes of this recordkeeping requirement, the Permittee shall assume that the ICEs are being run at full capacity.

C. ICEs not subject to New Source Performance Standards (NSPS)

This Section is applicable to ICEs marked as 'No' in NSPS applicability column in Equipment List, Attachment "C".

1. Particulate Matter and Opacity
- a. Emissions Limitations and Standards [A.A.C. R18-2-719.C.1]
- i. The Permittee shall not cause, allow or permit the emission of particulate matter, caused by combustion of fuel, from any stationary rotating machinery into the atmosphere in excess of the amounts calculated by the following equation:
- $$E = 1.02 Q^{0.769}$$
- Where
- E = the maximum allowable particulate emission rate in pounds-mass per hour
Q = the heat input in million Btu per hour
- ii. For purposes of this Section, the heat input shall be the aggregate heat content of all fuels whose products of combustion pass through a stack or other outlet. The total heat input of all operating fuel-burning units on a plant or premises shall be used for determining the maximum allowable amount of particulate matter which may be emitted. [A.A.C. R18-2-719.B]
- iii. Opacity [A.A.C. R18-2-719.E]
- (a) The Permittee shall not cause, allow or permit to be

emitted into the atmosphere from any stationary rotating machinery, smoke for any period greater than 10 consecutive seconds which exceeds 40 percent opacity.

- (b) Visible emissions when starting cold equipment shall be exempt from this requirement for the first 10 minutes.

b. Monitoring, Reporting, and Recordkeeping [A.A.C. R18-2-306.A.3.c]

- i. The Permittee shall keep records of fuel supplier certifications. The certification shall contain information regarding the name of fuel supplier and lower heating value of the fuel. These records shall be made available to ADEQ upon request.
- ii. A certified EPA Reference Method 9 observer shall conduct a monthly survey of visible emissions emanating from the stack of the IC engines if in operation. If the opacity of the emissions observed appears to exceed the standard, the observer shall conduct a certified EPA Reference Method 9 observation. The Permittee shall keep records of the initial survey and any EPA Reference Method 9 observations performed. These records shall include the emission point observed, name of observer, date and time of observation, and the results of the observation.
- iii. If the observation results in a Method 9 opacity reading in excess of 40 percent, the Permittee shall report this to ADEQ as excess emission and initiate appropriate corrective action to reduce the opacity below 40 percent. The Permittee shall keep a record of the corrective action performed.

c. Permit Shield [A.A.C. R18-2-325]

Compliance with this Part shall be deemed compliance with A.A.C. R18-2-719.C.1 and A.A.C. R18-2-719.E.

2. Sulfur Dioxide

a. Emission Limitations and Standards [A.A.C. R18-2-306.A.2 & -719.F]

- i. The Permittee shall not cause, allow or permit firing of any fuel other than low sulfur (sulfur content shall be less than 0.9 percent by weight) diesel fuel in the internal combustion engines.
- ii. While firing diesel fuel, the Permittee shall not emit or cause to emit more than 1.0 pound of sulfur dioxide per million Btu heat input.

- b. Monitoring, Recordkeeping, and Reporting
 - i. The Permittee shall keep daily records of the fuel used, sulfur content and lower heating value of the fuel being fired in the internal combustion engine. The Permittee shall keep records of fuel supplier certifications to demonstrate compliance with the sulfur content limit specified in Condition III.C.2.a. The certification shall contain the sulfur content of the fuel and the method used to determine the sulfur content of the fuel. These records shall be made available to ADEQ upon request. [A.A.C. R18-2-306.A.3.c and -719.I]
 - ii. The Permittee shall report to the Director any daily period during which the sulfur content of the fuel being fired in the internal combustion engine exceeds 0.8 percent. [A.A.C. R18-2-719.J]
- c. Permit Shield [A.A.C. R18-2-325]

Compliance with this Part shall be deemed compliance with A.A.C. R18-2-719.F, A.A.C. R18-2-719.I, and A.A.C. R18-2-719.J.

D. ICES Subject to National Emission Standards for Hazardous Air Pollutants (NESHAP)

- 1. Applicability [40 CFR §63.6595(a)(1)]
 - a. This Section is applicable to ICES marked as ‘Yes’ in NESHAP applicability column in Equipment List, Attachment “C”.
 - b. The Permittee shall comply with the terms of this Section no later than May 3, 2013.
- 2. Emission Limitations [40 CFR 63.6603(a), Table 2d; Item 3]

Carbon Monoxide (CO)

The Permittee shall, for each ICE,

 - a. Limit concentration of CO in the exhaust to 23 ppmvd at 15 percent oxygen (O₂); or
 - b. Reduce CO emission by 70 percent or more.
- 3. General Operating Requirements
 - a. The Permittee must be in compliance with the applicable emission/operating limitations at all times. [40 CFR 63.6605(a)]

- b. At all times the Permittee shall operate and maintain the ICEs, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the Permittee to make any further efforts to reduce emissions if levels required by this standard in Condition III.D.2 have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR 63.6605(b)]
- c. The Permittee, for ICEs not equipped with a closed crankcase ventilation system, must:
 - i. Install a closed crankcase ventilation system that prevents crankcase emissions from being emitted to the atmosphere, or
 - ii. Install an open crankcase filtration emission control system that reduces emissions from the crankcase by filtering the exhaust stream to remove oil mist, particulates, and metals.

The Permittee shall follow the manufacturer's specified maintenance requirements for operating and maintaining the open or closed crankcase ventilation systems and replacing the crankcase filters, or can request Director to approve different maintenance requirements that are as protective as manufacturer requirements. [40 CFR 63.6625(g)]

- d. The Permittee shall minimize the ICEs time at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63.6625(h)]
- e. Fuel Requirements [40 CFR 63.6604]

The Permittee shall use diesel fuel that meets the requirements in 40 CFR 80.510(b).

- i. Sulfur Content: 15 ppm maximum; and
 - ii. A minimum cetane index of 40 or a maximum aromatic content of 35 volume percent.
- f. If the Permittee uses an oxidation catalyst to meet the CO concentration limit or to reduce CO emissions shall meet the following operating limitations on the CI RICE: [40 CFR 63.6603(a), Table 2b; Item 1)]
 - i. Maintain the catalyst so that the pressure drop across the catalyst does not change by more than 2 inches of water at 100 percent

load plus or minus 10 percent from the pressure drop across the catalyst that was measured during the initial performance test; and

- ii. Maintain the temperature of the stationary RICE exhaust so that the catalyst inlet temperature is greater than or equal to 450 °F and less than or equal to 1350 °F.
- g. If the Permittee does not use an oxidation catalyst to meet the CO concentration limit or to reduce CO emissions, the Permittee shall comply with operating limitations approved by the Director.

4. Performance Testing

- a. The Permittee shall, within 180 days of the compliance date specified for in Condition III.D.1.b, conduct initial performance test according to Table 4 and Table 5 to Subpart ZZZZ of Part 63 to show compliance with the emission limits in Condition III.D.2 and any applicable operating limitations in Condition III.D.3.
[A.A.C. R18-2-312 and 40 CFR 63.6612(a)]

- b. Subsequent performance test shall be conducted every 8,760 hours or 3 years, whichever comes first as specified in Item 4, Table 3 to Subpart ZZZZ of Part 63.
[40 CFR 63.6615]

5. Reporting and Recordkeeping requirements

- a. The Permittee shall submit a semiannual compliance reports in accordance with Condition VII of Attachment “A” for the reporting requirements of this Section.
[40 CFR 63.6650(b)(5)]
- b. The Permittee shall keep records in a form suitable and readily available for expeditious review according to 40 CFR § 63.10(b)(1).
[40 CFR 63.6660(a)]
- c. The Permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
[40 CFR 63.6660(b)]
- d. The Permittee shall keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record.
[40 CFR 63.6660(c)]
- e. The Permittee shall maintain all applicable records as described in 40 CFR § 63.6655.
[40 CFR 63.6655]

6. Compliance Requirements

- a. The Permittee shall demonstrate continuous compliance with the emission limits in Condition III.D.2 and any applicable operating limitation in Condition III.D.3 according to Table 6 to Subpart ZZZZ of 40 CFR Part 63. [40 CFR 63.6640(a)]
- b. The compliance report shall include the following: [40 CFR 63.6650(c), (d) & (e)]
 - i. Company name and address.
 - ii. A statement by the responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report.
 - iii. Date of report and beginning and ending dates of the reporting period.
 - iv. For any malfunction during the reporting period, the compliance report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by the Permittee during a malfunction of an affected source to minimize emissions in accordance with §63.6605(b), including actions taken to correct a malfunction.
 - v. If there are no deviations from any operating limitations that apply a statement that there were no deviations from the operating limitations during the reporting period.
 - vi. If there were no periods during which the continuous monitoring system (CMS), including continuous emission monitoring system (CEMS) and continuous parameter monitoring system (CPMS), was out-of-control, as specified in §63.8(c)(7), a statement that there were no periods during which the CMS was out-of-control during the reporting period.
 - vii. If a deviation from an operating limitation occurs during the reporting period, the following additional information shall be provided:
 - (a) The total operating time of the CI engine at which the deviation occurred during the reporting period.
 - (b) Information on the number, duration, and cause of

deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

- viii. While using a CMS to comply with emission or operating limitation, for each deviation from emission or operating limitation, the report should include information contained in Condition III.D.6.b.i to v, and the following:
- (a) The date and time that each malfunction started and stopped;
 - (b) The date, time, and duration that each CMS was inoperative, except for zero (low-level) and high-level checks;
 - (c) The date, time, and duration that each CMS was out-of-control, including the information in §63.8(c)(8);
 - (d) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of malfunction or during another period;
 - (e) A summary of the total duration of the deviation during the reporting period, and the total duration as a percent of the total source operating time during that reporting period;
 - (f) A breakdown of the total duration of the deviations during the reporting period into those that are due to control equipment problems, process problems, other known causes, and other unknown causes;
 - (g) A summary of the total duration of CMS downtime during the reporting period, and the total duration of CMS downtime as a percent of the total operating time of the stationary RICE at which the CMS downtime occurred during that reporting period;
 - (h) An identification of each parameter and pollutant (CO or formaldehyde) that was monitored at the stationary RICE;
 - (i) A brief description of the stationary RICE;
 - (j) A brief description of the CMS;
 - (k) The date of the latest CMS certification or audit; and

- (l) A description of any changes in CMS, processes, or controls since the last reporting period.

7. Permit Shield [A.A.C. R-18-2-325]

Compliance with the conditions in this Part shall be deemed compliance with 40 CFR 6595(a)(1); 6603(a); 6604; 6605(a) & (b); 6612(a); 6625(g), & (h), 6640(a), 6650(b)(5), (c), (d) & (e), and 6660(a), (b), & (c).

IV. GASOLINE DISPENSING FACILITIES

A. Applicability

This Section applies to the following: [40 CFR 63.11111 (a), (b), and 63.11112(a)]

- 1. Gasoline Dispensing Facilities (GDF), Storage tank at the GDF listed in Equipment List, Attachment "C" and associated equipment components in vapor or liquid gasoline service. Pressure/ Vacuum vents on gasoline storage tank and equipment necessary to unload product from cargo tanks into storage tank at GDF. The equipment used for the refueling of motor vehicles is not covered.
- 2. Each gasoline cargo tank during the delivery of product to the GDF.

B. Operating Limitations

- 1. GDF
 - a. The Permittee shall not allow gasoline to be handled in a manner that would result in vapor release to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following:
 - i. Minimize gasoline spills;
 - ii. Clean up spills as expeditiously as practicable;
 - iii. Cover all open gasoline containers and all gasoline storage tank fill-pipes with a cover having a gasketed seal when not in use;
 - iv. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/ water separators. [40 CFR 63.11116(a)]
 - b. The Permittee shall have records available within 24 hours of a request by the Director to document the gasoline throughput. [40 CFR 63.11116(b)]
- 2. Storage Tank
 - a. Gasoline storage tank shall be equipped with a submerged filling device,

or acceptable equivalent, for control of hydrocarbon emissions.

[A.A.C. R18-2-710.B]

- b. All pumps and compressors that handle gasoline shall be equipped with mechanical seals or other equipment of equal efficiency to prevent release of organic contaminants into the atmosphere. [A.A.C. R18-2-710.D]

C. Monitoring and Recordkeeping Requirement

1. The Permittee shall maintain a monthly record of the gasoline throughput of the GDF.
2. The Permittee shall, for the gasoline storage tank, maintain a file of the typical Reid vapor pressure of gasoline stored and of dates of storage. Dates on which the storage vessel is empty shall be shown. [A.A.C. R18-2-710.E.1]
3. If the stored gasoline is in a storage vessel other than one equipped with a vapor recovery system or its equivalent and the true vapor pressure is greater than 470 mm Hg (9.1 psia), the Permittee shall record the average monthly temperature, and true vapor pressure of gasoline at such temperature. [A.A.C. R18-2-710.E.2.b]
4. The average monthly storage temperature shall be an arithmetic average calculated for each calendar month, or portion thereof, if storage is for less than a month, from bulk liquid storage temperature determined at least once every seven days. [A.A.C. R18-2-710.E.3]
5. The true vapor pressure shall be determined by the procedures in American Petroleum Institute Bulletin 2517, amended as of February 1980 (and no future editions), which is incorporated herein by reference and on file with the Office of the Secretary of State. This procedure is dependent upon determination of the storage temperature and the Reid vapor pressure, which requires sampling of the petroleum liquids in the storage vessels. Unless the Director requires in specific cases that the stored petroleum liquid be sampled, the true vapor pressure may be determined by using the average monthly storage temperature and the typical Reid vapor pressure. For those liquids for which certified specifications limiting the Reid vapor pressure exist, the Reid vapor pressure may be used. For other liquids, supporting analytical data must be made available upon request to the Director when typical Reid vapor pressure is used. [A.A.C. R18-2-710.E.4]

D. Permit Shield

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

Compliance with the conditions of this Part shall be deemed compliance with 40 CFR 63.11111(a) & (b), 63.11112(a), 63.11116(a) & (b), and A.A.C. R18-2-710.B, D, E.1, E.2.b, E.3 & E.4.

V. FUGITIVE DUST REQUIREMENTS

A. Applicability

This Section applies to any 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 percent measured in accordance with the Arizona Testing Manual, Reference Method 9. [A.A.C. R18-2-614]
- b. The Permittee shall not cause, allow or permit visible emissions from any fugitive dust point source, in excess of 20 percent opacity. [A.A.C. R18-2-702.B]
- c. The Permittee shall employ the following reasonable precautions to prevent excessive amounts of particulate matter from becoming airborne
 - i. 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]
 - ii. 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]
 - iii. 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 is repaired, constructed, or reconstructed; [A.A.C. R18-2-605.A]
 - iv. Take reasonable precautions, such as wetting, applying dust suppressants, or covering the load when transporting material likely to give rise to airborne dust; [A.A.C. R18-2-605.B]
 - v. Take reasonable precautions, such as the use of spray bars,

wetting agents, dust suppressants, covering the load, and hoods when crushing, handling, or conveying material likely to give rise to airborne dust; [A.A.C. R18-2-606]

- vi. Take reasonable precautions such as chemical stabilization, wetting, or covering when organic or inorganic dust producing material is being stacked, piled, or otherwise stored; [A.A.C. R18-2-607.A]
- vii. Operate stacking and reclaiming machinery utilized at storage piles at all times with a minimum fall of material, or with the use of spray bars and wetting agents; [A.A.C. R18-2-607.B]
- viii. Any other method as proposed by the Permittee and approved by the Director. [A.A.C. R18-2-306.A.3.c]

2. Monitoring and Recordkeeping Requirements

- a. The Permittee shall maintain records of the dates on which any of the activities listed in Conditions V.B.1.c.i through V.B.1.c.viii above were performed and the control measures that were adopted. [A.A.C. R18-2-306.A.3.c]

b. Opacity Monitoring Requirements

- i. A certified Method 9 observer shall conduct a monthly visual survey of visible emissions from the fugitive dust sources. The Permittee shall keep a record of the name of the observer, the date and location on which the observation was made, and the results of the observation.
- ii. If the observer sees a visible emission from a fugitive dust source that on an instantaneous basis appears to exceed applicable opacity standard, then the observer shall, if practicable, take a six-minute Method 9 observation of the visible emission.
 - (a) If the six-minute opacity of the visible emission is less than or equal to applicable opacity standard, the observer shall make a record of the following:
 - (i) Location, date, and time of the observation; and
 - (ii) The results of the Method 9 observation.
 - (b). If the six-minute opacity of the visible emission exceeds applicable opacity standard, then the Permittee shall do the following:

- (i) Adjust or repair the controls or equipment to reduce opacity to below the applicable standard; and
- (ii) Report it as an excess emission under Section XII.A of Attachment "A".

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

- 4. Permit Shield [A.A.C. R18-2-325]

Compliance with the conditions of this Part shall be deemed compliance with A.A.C. R18-2-604.A, A.A.C. R18-2-604.B, A.A.C. R18-2-605, A.A.C. R18-2-606, A.A.C. R18-2-607, and A.A.C. R18-2-612.

VI. MOBILE SOURCES

A. Emission Limitations/Standards

- 1. Roadway and Site Cleaning Machinery

The Permittee shall not cause, allow or permit to be emitted into the atmosphere from any roadway and site cleaning machinery smoke or dust for any period of time greater than 10 consecutive seconds, the opacity of which exceeds 40 percent. Visible emissions when starting cold equipment shall be exempt from this requirement for the first 10 minutes.

[A.A.C.R18-2-804.A]

- 2. The Permittee shall not cause, allow or permit to be emitted into the atmosphere from any off-road machinery, smoke for any period of time greater than 10 consecutive seconds, the opacity of which exceeds 40 percent. Visible emissions when starting cold equipment shall be exempt from this requirement for the first 10 minutes.

[A.A.C.R18-2-802.A]

- B. Permit Shield** [A.A.C. R18-2-325]

Compliance with the conditions of this part shall be deemed compliance with the following requirements as of the date of issuance of this permit: A.A.C. R18-2-802.A and A.A.C. R18-2-804.A.

VII. OTHER PERIODIC ACTIVITIES

A. Abrasive Blasting

Particulate Matter and Opacity Standards

- 1. Emission Limitation/Standards

- a. 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:

- i. Wet blasting
- ii. Effective enclosure with necessary dust collecting equipment; or
- iii. Any other method approved by the Director.

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

- b. Opacity Limitations [A.A.C. R18-2-702.B.3]

The Permittee shall not cause, allow, or permit to be emitted into the atmosphere from any sandblasting or other abrasive blasting operations, opacity of greater than 20 percent.

2. Monitoring and Recordkeeping Requirement [A.A.C. R18-2-306.A.3.c]

Each time an abrasive blasting project is conducted, the Permittee shall log in ink or in an electronic format, 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.

3. Permit Shield [A.A.C. R18-2-325]

Compliance with the conditions of this part shall be deemed compliance with the requirements of A.A.C. R18-2-702.B.3 and A.A.C. R18-2-726.

B. Use of Paints

1. Volatile Organic Compound Standards

- a. Emissions Limitations/Standards

While performing spray-painting operations, the Permittee shall comply with the following requirements:

- i. 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]

- ii. The Permittee shall not either: [A.A.C. R18-2-727.B]
 - (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.

- iii. For the purposes of Conditions VII.B.1.a.ii. and VII.B.1.a.iv, 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 Conditions VII.B.1.a.iii.(a) through VII.B.1.a.iii.(c) below, or which exceeds any of the following percentage composition limitations, referred to the total volume of solvent: [A.A.C. R18-2-727.C]
 - (a) A combination of the following types of compounds having an olefinic or cyclo-olefinic type of unsaturation-hydrocarbons, alcohols, aldehydes, esters, ethers, or ketones: 5 percent.
 - (c) 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.

- iv. 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 Conditions VII.B.1.a.iii.(a) through VII.B.1.a.iii.(c) above, 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 [A.A.C. R18-2-306.A.3.c]
 - i. Each time a spray painting project is conducted, the Permittee shall log in ink, or in an electronic format, a record of the following:
 - (a) The date the project was conducted;
 - (b) The duration of the project;

- (c) Type of control measures employed, if any;
 - (d) Material Safety Data Sheets for all paints and solvents used in the project; and
 - (e) The amount of paint consumed during the project.
- ii. Spot painting projects shall be exempt from the recordkeeping requirements of Condition VII.B.1.b.i above.
- c. Permit Shield [A.A.C. R18-2-325]

Compliance with the conditions of this part shall be deemed compliance with the following requirements as of the date of issuance of this permit: A.A.C. R18-2-727.

C. Demolition/Renovation

Hazardous Air Pollutants Standards

1. Emissions Limitation/Standard [A.A.C. R18-2-1101.A.8]

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

2. Monitoring and Recordkeeping Requirement [A.A.C. R18-2-306.A.3.c]

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.

3. Permit Shield [A.A.C. R18-2-325]

Compliance with the conditions of this part shall be deemed compliance with A.A.C. R18-2-1101.A.8 as of the date of issuance of this permit.

ATTACHMENT “C”: EQUIPMENT LIST
Air Quality Control Permit No. 53618 for
Eurofresh, Inc.

Site #	Equipment Type/ID	Maximum Rated Capacity	Make/ Model	Serial Number	Year of Manufacture	NSPS Applicable	NESHAP Applicable
1	Boiler 1/ S1B1	41.28 MMBtu/hr	Danstoker/ Nilus	E92-1196-2	1992	Yes, Subpart Dc	No
	Boiler 2/ S1B2	39.88 MMBtu/hr	Danstoker/ Nilus	E92-1196-1	1992	Yes, Subpart Dc	No
	Boiler 3/ S1B3	38.47 MMBtu/hr	Danstoker/ TVB-15	E96-2239-2	1996	Yes, Subpart Dc	No
	Generator-1/ S1G1	1193 hp	Mitsubishi/ S12H-PTA	30075	1999	No	Yes, Subpart ZZZZ
	Generator-2/ S1G2	827 hp	Perkins/ 3000	SGC120229 U1642F	1999	No	Yes Subpart ZZZZ
2	Boiler 1/ S2B1	41.74 MMBtu/hr	Crone/ CW-285	9715132	1997	Yes, Subpart Dc	No
	Boiler 2/ S2B2	35.87 MMBtu/hr	Crone/ CW-285	9715133	1997	Yes, Subpart Dc	No
	Boiler 3/ S2B3	41.25 MMBtu/hr	Crone/ CW-285	9715131	1997	Yes, Subpart Dc	No
	Generator-1/ S2G1	1623hp	Anglo Belgian/ 6EDZC-900-166-A	12915	2005	No	Yes, Subpart ZZZZ
	Generator-2/ S2G2	1623hp	Anglo Belgian/ 6EDZC-900-166-A	12913	2005	No	Yes, Subpart ZZZZ

Site #	Equipment Type/ID	Maximum Rated Capacity	Make/ Model	Serial Number	Year of Manufacture	NSPS Applicable	NESHAP Applicable
3	Boiler 1/ S3B1	38.93 MMBtu/hr	Crone/ CW-285	9912.538	1999	Yes, Subpart Dc	No
	Boiler 2/ S3B2	41.04 MMBtu/hr	Crone/ CW-285	9912.537	1999	Yes, Subpart Dc	No
	Boiler 3/ S3B3	41.25 MMBtu/hr	Crone/ CW-285	9912.536	1999	Yes, Subpart Dc	No
	Generator-1/ S3G1	1623 hp	Anglo Belgian/ 6EDZC-900-166-A	12916	2005	No	Yes, Subpart ZZZZ
	Generator-2/ S3G2	1623 hp	Anglo Belgian/ 6EDZC-900-166-A	12914	2005	No	Yes, Subpart ZZZZ
4	Boiler 1/ S4B1	41.28 MMBtu/hr	Danstoker/ Nilus	E96-2239-1	1996	Yes, Subpart Dc	No
	Boiler 2/ S4B2	39.88 MMBtu/hr	Danstoker/ TVB-15	22-6919-2	2003	Yes, Subpart Dc	No
	Boiler 3/ S4B3	38.47 MMBtu/hr	Danstoker/ TVB-15	22-6919-1	2003	Yes, Subpart Dc	No
	Generator-1/ S4G1	1193 hp	Mitsubishi/ S12H-PTA	30074	1999	No	Yes, Subpart ZZZZ
	Generator-2/ S4G2	1448 hp	Mitsubishi/ S12R-PTA	10702	2003	No	Yes, Subpart ZZZZ
5	Boiler 1/ S5B1	40.41 MMBtu/hr	Van Dijk/ HWR-116	55	2005	Yes, Subpart Dc	No
	Boiler 2/ S5B2	40.41 MMBtu/hr	Van Dijk/ HWR-116	56	2005	Yes, Subpart Dc	No
	Boiler 3/ S5B3	40.41 MMBtu/hr	Van Dijk/ HWR-116	54	2005	Yes, Subpart Dc	No
	Generator-1/ S5G1	1528 hp	Mitsubishi/ S12H-PTA	D0018	2005	No	Yes, Subpart ZZZZ
	Generator-2/ S5G2	1528 hp	Mitsubishi/ S12H-PTA	D0017	2005	No	Yes, Subpart ZZZZ

Site #	Equipment Type/ID	Maximum Rated Capacity	Make/ Model	Serial Number	Year of Manufacture	NSPS Applicable	NESHAP Applicable
6	Boiler 1/ S6B1	41.50 MMBtu/hr	Van Dijk/ HWR-116	43	2006	Yes, Subpart Dc	No
	Boiler 2/ S6B2	41.14 MMBtu/hr	Van Dijk/ HWR-116	44	2006	Yes, Subpart Dc	No
	Boiler 3/ S6B3	41.53 MMBtu/hr	Van Dijk/ HWR-116	42	2006	Yes, Subpart Dc	No
	Generator-1/ S6G1	1528 hp	Mitsubishi/ S12R-PTA	D0116	2006	No	Yes, Subpart ZZZZ
	Generator-2/ S6G2	1528 hp	Mitsubishi/ S12R-PTA	D0115	2006	No	Yes, Subpart ZZZZ
	Standby ICE	1019 hp	Detroit/ DDC 850 E	W6929	1992	No	Yes, Subpart ZZZZ
	Gasoline Storage Tank	1000 gallons					Yes, Subpart CCCCC