

**SHEFFIELD LUBRICANTS LLC - CASA GRANDE**

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## 1. Introduction

This permit pertains to a distilled petroleum products manufacturing facility, operated by Sheffield Lubricants LLC. The SIC Code is 2911 and the NAICS Code is 324110. The facility, also known as Sheffield Lubricants Lube Oil Plant is located at 148 South Commerce Drive, Casa Grande, Arizona upon a parcel also identified by Pinal County Assessor's Parcel #503-48-1160. The source is situated in an area classified as attainment for ozone.

~~This~~ Permit Revision B31265.R01 authorized the installation and operation of a clay polishing system and water evaporator. The VOC and HAP emissions generated by these processes are controlled by a Thermal Oxidizer (TO) and an incineration chamber. Since the permit required additional testing, monitoring, and recordkeeping, this revision was considered to be significant.

The facility processes oily water as well as used oil into process water, lube oil, asphalt, gasoline blendstock and diesel blendstock. The facility is designed to process up to 1,000 barrels per day of used oil and up to 800 barrels per day of oily water. The process is designed to be powered by a natural gas fired boiler and a heater, designed to code and PLC controlled. The process is a closed loop system using heat exchangers and condensing units.

Used oil feedstock is transferred from truck and/or rail into the used oil storage tanks. The used oil feedstock is continuously fed into the first stage fractionation column, passing through a heat exchanger to preheat the feed while cooling the lube oil product stream.

In the first stage fractionation column, the light fractions are vaporized using hot oil under moderate vacuum and passed to a condenser. The first stage bottoms are then fed to a second stage fractionation column passing through the heater to further preheat the stream.

In the second stage fractionation column, the lube oil fraction is vaporized under moderate vacuum and passed to a condenser. After condensing using chilled water, the lube oil fraction is subcooled via heat exchangers and stored in lube oil storage tanks. Non-condensable hydrocarbon vapors are compressed and used as a fuel in the hot oil heater. Subsequently, a portion of the cool lube oil products are loaded onto trucks and/or railcars for transport. The remaining cool lube oil products are passed through a clay polishing system to produce a clean finished base oil. This polished base oil is then stored in base oil storage tanks and subsequently loaded onto trucks and/or railcars for transport. Impurities from the lube oil captured in the clay system are then incinerated within a closed chamber. Vapors from the incineration are captured and diverted to a thermal oxidizer for destruction of VOC and HAPs. The destruction efficiency of the oxidizer is 97-99.9%.

The bottoms from the second stage fractionation column are transferred to asphalt storage tanks, and subsequently loaded onto railcars and/or trucks for transport.

The vapor-phase light fraction from the first stage fractionation column is passed to a condensing unit, which condenses the produced water and diesel/gasoline blend using chilled water. Produced water is separated from the diesel/gasoline fraction via a gravity separator. The produced water and the diesel/gasoline fraction are transferred to a produced water storage tank, and a gasoline blend stock storage tank, respectively. Subsequently, a portion of the diesel/gasoline fraction are loaded onto trucks for transport. The remaining portion of diesel/gasoline is used as fuel for the wastewater evaporators. Produced water along with process wastewater is accumulated in the water storage tank until ready to divert to the wastewater evaporators. The water is atomized into a sealed heated chamber for incineration. The chamber is heated to greater than 1,200°F to ensure combustion of any emulsified hydrocarbon left in the water and destruction of VOC and HAPs from the emissions. The destruction efficiency of the incineration chamber is 95%. The resulting clean water vapor is then exhausted to the atmosphere.

Non-condensed gases from the second stage vacuum pump are compressed and used as a fuel in the oil heater. The destruction efficiency of the oil heater process to remove VOCs is 90-95%.

The source is not subject to the New Source Performance Standard for Volatile Organic Storage Vessels, Subpart Kb since the facility does not meet the applicability standards for the various tanks in terms of tank sizes and the related vapor pressure of the liquids stored.

Since the facility does not manufacture any synthetic organic chemicals, it is not subject to the National Emission Standards for Organic Hazardous Air Pollutants from Synthetic Organic Chemical Manufacturing Industry, Subpart F.

The source includes equipment for processing used oil. A complete list of equipment from which emissions are allowed by this permit is given in Section 8 of this permit. As an informational disclosure, emissions listed in the last section of this permit entitled "Emission Inventory Table" constitute good-faith estimates of emissions subject to regulation, as set forth in the application for permit.

Even based upon continuous operation at full capacity, the cumulative potential to emit any single pollutant or combination of pollutants does not exceed any of the applicable major source thresholds under the Clean Air Act (1990) ("CAA") or local rules. The source does not fall subject to any applicable requirements under CAA §111 or §112. Therefore, this source does not require an operating permit under Title V of the CAA.

## 2. Authority to Construct

- A. Generally [*Federally enforceable pursuant to PCAQCD Code §§3-1-010, 3-1-040 (10/12/95) approved as a SIP element at 65 FR 79742 (12/20/00)*]

Emissions from this facility, specifically the equipment described in "Equipment Schedule" section below, and the operating configuration more fully described in the application for permit, already fall subject to the independent Federally Enforceable limitations identified elsewhere in this permit. Therefore, based on the regulations in effect upon the date of issuance of this permit and a finding that allowable emissions from the equipment described in the Equipment Schedule will neither cause nor contribute to a violation of any ambient air quality standard even without any additional limitations, and a further finding that this does not constitute a "major source" within the meaning of Code §3-3-203, this permit constitutes authority to construct and operate such equipment.

- B. Minor New Source Review Requirements - Equipment Authorized [*Code §§3-1-010, 3-1-040 (as amended 10/12/95) approved as a SIP element at 61 FR 15717 (4/9/96)*];

All the equipment as identified in Section §8.A of this permit.

## 3. Emission Limitations and Controls

- A. Applicable Limitations [*Federally enforceable pursuant to PCAQCD Code § 3-1-082 (11/3/93) approved as SIP Elements at 65 FR 79742 (12/20/00)*]

Where different standards or limitations apply under this permit, the most stringent combination shall prevail and be enforceable.

- B. Allowable Emissions [*Federally enforceable pursuant to PCAQCD Code § 3-1-040 (10/12/95) approved as SIP Elements at 65 FR 79742 (12/20/00)*]

The owner/operator ("Permittee") is authorized to discharge or cause to discharge into the atmosphere those emissions of air contaminants as set forth in this permit. Unless exempted under Code §3-1-040.C, or authorized by a separate permit, by this permit or by a revision or operational change allowed under Chapter 3, Article 2 of the Code, Permittee shall not commence construction of, operate or make any modification to

this source in a manner which will cause emissions of any regulated air pollutant in excess of the *minimis* amount.

C. Emissions Limitations - VOC's and HAP's [*Federally enforceable provision, pursuant to Code §3-1-084 (8/11/94)*] (Code §3-1-081.A)

1. Emission Cap

Permittee shall limit emissions, in any consecutive twelve-month period, such that:

- a. Emissions of VOCs do not exceed 100 tons;
- b. Emissions of any single HAP does not exceed 10 tons.
- c. Emissions of combined HAPs do not exceed 25 tons.

2. Throughput Limitation

Permittee shall not process more than 1,000 barrels of used oil per day.

3. Process Controls

- a. The water separator shall be operated within the temperature range of 20°C to 60°C and a pressure of up to 100 psig.
- b. The first stage fractionating column shall be operated within the temperature range of 180°C to 350°C and a pressure of up to 35 psig.
- c. The second stage fractionating column and the condenser shall be operated within the temperature range of 250°C to 450°C and a pressure of up to 20 mm Hg.
- d. Thermal oxidizer (TO) shall be operated within the temperature range of 1,200°F to 1,400°F.
- e. The oil heater shall be operated at a temperature of 800°F or higher.
- f. The destruction efficiency of the TO for the clay polishing system shall be at least 97% or higher.
- g. The destruction efficiency of the water evaporator incineration chamber shall be at least 95% or higher.
- h. The destruction and removal efficiency of the fuel oil heater shall be at least 90% or higher.

4. Fugitive Emissions Control

Routine inspections of tanks, valves, pump seals, connectors, flanges, and open-ended lines must be conducted on a monthly basis to minimize emissions of volatile organic compounds and hazardous air pollutants into the atmosphere.

5. Emission Limitations

The throughput limitation and controls required by this permit will limit the potential emissions of volatile organic compounds and hazardous air pollutants to approximately ten percent (10%) of the major source trigger even when the facility is operated at a full capacity.

D. Storage of Volatile Organic Compounds (Code §5-18-740)

1. No person shall place, store or hold in any stationary tank, reservoir or other container, of more than 40,000 gallons capacity, any gasoline or any petroleum distillate having a vapor pressure of 1.5 pounds per square inch absolute or greater under actual storage conditions unless such tank, reservoir or other container is a pressure tank maintaining working pressures sufficient at all times to prevent hydrocarbon vapor or gas loss to the atmosphere, or is equipped with a floating roof or vapor recovery system or other vapor emission control device.
2. No person shall load or permit the loading of gasoline into any stationary tank with a capacity of 250 gallons or more or store more than 500 gallons on site at one time [Code §1-3-140-75.b.ii] unless such tank is equipped with either submerged filling inlets or with vapor recovery or emission control systems such that loss of vapor to the atmosphere during filling operations shall be minimized.

E. Standards of Performance for Storage Vessels for Petroleum Liquids (Code §§5-18-742.A, B, & D)

1. No person shall place, store or hold in any reservoir, stationary tank or other container, having a capacity of 40,000 (151,400 liters) or more gallons, any petroleum liquid having a vapor pressure of 1.5 pounds per square inch absolute or greater under actual storage conditions, unless such tank, reservoir or other container is a pressure tank maintaining working pressure sufficient at all times to prevent hydrocarbon vapor or gas loss to the atmosphere, or is equipped with **one of the following** control devices, properly installed, in good working order and in operation:
  - a. **A floating roof consisting of a pontoon type double-deck type roof resting on the surface of the liquid contents and equipped with a closure seal to close the space between the roof eave and tank wall and a vapor balloon or vapor dome, designed in accordance with accepted standards of the petroleum industry. The control equipment shall not be used if the petroleum liquid has a vapor pressure of 12 pounds per square inch absolute or greater under actual storage conditions.**
    - i. **All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.**
    - ii. **There shall be no visible holes, tears or other openings in the seal or any seal fabric. Where applicable, all openings except drains shall be equipped with a cover, seal or lid. The cover, seal, or lid shall be in a closed position at all times, except when the device is in actual use.**
    - iii. **Automatic bleeder vents shall be closed at all times, except when the roof is floated off or landed on the roof leg supports.**
    - iv. **Rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports, or at the manufacturer's recommended setting.**
  - b. **Other equipment proven to be of equal efficiency for preventing discharge of hydrocarbon gases and vapors to the atmosphere, to that of a floating roof control device.**

2. Any other petroleum liquid storage tank shall be equipped with a submerged filling device, or acceptable equivalent, for the control of hydrocarbon emissions.
3. All pumps and compressors which handle VOCs shall be equipped with mechanical seals or other equipment of equal efficiency to prevent the release of organic contaminants into the atmosphere.

F. Particulate Emissions - Process Industries [*Currently federally enforceable pursuant to PGAQCD Reg. 7-3-1.8 (3/31/75) approved as a SIP element at 43 FR 50531 (11/15/78)*] (Code §5-5-190)

Permittee shall capture, to the maximum practical extent, all particulate matter resulting from operation of individual equipment comprising the complete process. Permittee not cause, suffer, allow or permit the discharge of particulate matter into the atmosphere in any one hour from any existing process source whatsoever, except fuel-burning equipment, in total quantities in excess of the amount calculated by whichever of the following equations may be applicable:

1. For any process operating at a production process weight rate ("P") up to 30 tons-per-hour, allowable emissions ("E") shall not exceed:

$$E = 4.10 P^{0.67} \text{ pounds-per-hour.}$$

2. For any process operating at a production process weight rates ("P") equal to or greater than 30 tons-per-hour, allowable emissions ("E") shall not exceed:

$$E = (55.0 P^{0.11} - 40.0) \text{ pounds-per-hour.}$$

G. Particulate Emissions - Opacity Limits

1. SIP Limitation [*Currently federally enforceable pursuant to PGAQCD Reg. 7-3-1.1 (6/16/80) approved as a SIP element at 47 FR 15579 (4/12/82)*] (Codes §§2-8-300 and 4-2-040.)

The opacity of any plume or effluent shall not be greater than 40 percent as determined by Reference Method 9 in the Arizona Testing Manual (ADEQ, 1992). Nothing in this limitation shall be interpreted to prevent the discharge or emission of uncontaminated aqueous steam, or uncombined water vapor, to the open air.

2. Visibility Limiting Standard [*Federally enforceable provision, pursuant to Code §2-8-300 (as amended 5/18/05) approved as a SIP element at 47 FR 15043 (3/27/06)*]

The opacity of any plume or effluent from any point source not subject to a New Source Performance Standard adopted under Chapter 6 of the Code, and not subject to an opacity standard in Chapter 5 of the Code, shall not be greater than 20% as determined in Method 9 in 40 CFR Part 60, Appendix A.

H. Particulate Matter Reasonable Precautions [*Currently federally enforceable pursuant to Code §4-2-040 (6/29/93) approved as a SIP element at 72 FR 41896 (8/1/07) and PGAQD Reg. 7-3-1.2 approved as a SIP element at 43 FR 53034 (11/15/78)*]

1. Permittee shall not cause, suffer, allow, or permit a building or its appurtenances, subdivision site, driveway, parking area, vacant lot or sales lot, or an urban or suburban open area to be constructed, used, altered, repaired, demolished, cleared, or leveled, or the earth to be moved or excavated, or fill dirt to be deposited, without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.

2. Permittee shall not cause, suffer, allow, or permit a vacant lot, or an urban or suburban open area, to be driven over or used by motor vehicles, such as but not limited to all-terrain vehicles, trucks, cars, cycles, bikes, or buggies, without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.
3. Permittee shall not disturb or remove soil or natural cover from any area without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.
4. Permittee shall not crush, screen, handle or convey materials or cause, suffer, allow or permit material to be stacked, piled or otherwise stored without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.
5. Stacking and reclaiming machinery utilized at storage piles shall be operated at all times with a minimum fall of material and in such a manner, or with the use of spray bars and wetting agents, as to prevent excessive amounts of particulate matter from becoming airborne. Other reasonable precautions shall be taken, as necessary, to effectively prevent fugitive dust from becoming airborne.
6. Permittee shall not cause, suffer, allow or permit transportation of materials likely to give rise to fugitive dust without taking reasonable precautions to prevent fugitive dust from becoming airborne. Earth and other material that is tracked out or transported by trucking and earth moving equipment on paved streets shall be removed by the party or person responsible for such deposits.
7. Permittee shall not cause, suffer, allow or permit the use, repair, construction or reconstruction of any road or alley without taking every reasonable precaution to effectively prevent fugitive dust from becoming airborne.

~~I. Surface Stabilization [Federally enforceable pursuant to Code §4-1-030 (10/28/15) approved as a SIP element at 82 FR 20267 (5/1/17)]~~

- ~~1. Permittee shall not cause or allow visible fugitive dust emissions from open areas / vacant lots (areas not being utilized for an activity) to exceed 20% opacity based on EPA Method 9 or the continuous plume or intermittent plume methods listed in PCAQCD Code §4-9-340.~~
- ~~2. Permittee shall erect barriers or no trespassing signs upon evidence of trespass on open areas / vacant lots.~~
- ~~3. Permittee shall stabilize any open area / vacant lot greater than 1.0 acre that has 0.5 acre or more of disturbed surface and sign up for the Pinal County Dust Control forecast within 30 days of discovery. The open area / vacant lot shall be stabilized the day leading up to and the day that is forecast to be high risk for dust emissions.~~
- ~~4. Permittee shall not remove vegetation from open areas / vacant lots without applying dust suppressants before and during the weed abatement. Track out onto paved surfaces must be prevented or eliminated and dust suppressants must be applied following weed abatement to stabilize the entire surface.~~
- ~~5. Stabilization of open areas / vacant lots is determined by the drop ball, threshold friction velocity, flat vegetation or standing vegetation methods listed in PCAQCD Code 4-9-320.~~
- ~~6. Permittee shall not cause or allow visible fugitive dust emissions from unpaved lots (areas being utilized for an activity) greater than 5000 square feet to exceed 20% opacity based on EPA Method 9 or the continuous plume or intermittent plume methods listed in PCAQCD Code §4-9-340.~~



7. ~~Permittee shall not allow silt loading equal to or greater than 0.33 oz/ft<sup>2</sup> or allow the silt content to exceed 8% on unpaved lots greater than 5000 square feet.~~
8. ~~Permittee shall stabilize unpaved lots greater than 5000 square feet by paving, applying a dust suppressant or graveling.~~
9. ~~Permittee shall clean up track out on a paved public roadway that exceeds 50 feet within 24 hours of discovery and limit opacity to 20% or less while using a rotary brush or broom.~~
10. ~~Permittee shall make a record of the control measures applied.~~

**I. Surface Stabilization [*Federally enforceable pursuant to Code §4-1-010 (10/28/15) approved as a SIP element at 82 FR 20267 (5/1/17), Amended 1/25/23*]**

1. **Vehicle Use in Open Areas and Vacant Lots (Code §4-1-030.2)**
  - a. Permittee shall not cause or allow visible emissions of particulate matter, including fugitive dust generated from the vehicle use in open areas and vacant lots beyond the property line within which the emissions are generated.
  - b. Permittee shall stabilize the open areas and vacant lots on which vehicles are used to by complying with any one of the stabilization requirements listed in PCAQCD Code §4-1-030.2.A.
  - c. Permittee shall apply appropriate control measures to the open areas and vacant lots on which vehicles are used as listed in PCAQCD Code §4-1-030.2.B.
  - d. Permittee shall implement one or more of the control measures described in PCAQCD Code §4-1-030.2.B within 60 calendar days following the initial discovery by the Control Officer of any open areas and vacant lots that are 0.10 acre (4,356 square feet) or larger and having a cumulative of 500 square feet or more that are disturbed by being driven over and/or used by motor vehicles, by off road vehicles, or for material dumping.
  - e. Permittee shall, within 30 calendar days following the initial discovery by the Control Officer of the disturbance or vehicle use on open areas and vacant lots, provide in writing to the Control Officer a description and date of the control measure(s) to be implemented to prevent such disturbance.
  - f. Permittee shall implement all control measures necessary to limit the disturbance or vehicle uses on open areas and vacant lots in accordance with the requirements of PCAQCD Code §4-1-030.2.B. Control measure(s) shall be considered effectively implemented when the open areas and vacant lots meets the requirements described in PCAQCD Code §4-1-030.2.A.
  - g. Use of or parking on open areas and vacant lots by the Permittee shall not be considered vehicles use in open areas and vacant lots.
  - h. Establishing initial landscapes without the use of mechanized equipment or conducting landscape maintenance without the use of mechanized equipment shall not be considered vehicle use in open areas and vacant lots.
2. **Open Areas and Vacant Lots (Code §4-1-030.3)**

- a. Permittee shall not cause or allow visible emissions of particulate matter, including fugitive dust generated from the open areas and vacant lots beyond the property line within which the emissions are generated.
  - b. Permittee shall stabilize the open areas and vacant lots by complying with any one of the stabilization requirements listed in PCAQCD Code §4-1-030.3.A.ii.
  - c. Permittee shall apply appropriate control measures to the disturbed open areas and vacant lots as listed in PCAQCD Code §4-1-030.3.B.
  - d. Permittee shall implement one or more of the control measures described in PCAQCD Code §4-1-030.3.B within 60 calendar days following the initial discovery by the Control Officer of any open areas and vacant lots that are 0.10 acre (4,356 square feet) or larger and having a cumulative of 500 square feet or more that are disturbed, and if such disturbed area remains unoccupied, unused, vacant, or undeveloped for more than 15 days.
  - e. Permittee shall, within 30 calendar days following the initial discovery by the Control Officer of the disturbance on the open areas and vacant lots, provide in writing to the Control Officer a description and date of the control measure(s) to be implemented to prevent such disturbance.
  - f. Permittee shall apply the control measures listed in PCAQCD Code §4-1-030.5.A if machinery is used to clear weeds and/or trash from open areas and vacant lots of 5,000 square feet or larger.
3. Unpaved Parking Lots (Code §4-1-030.4)
- a. Permittee shall not cause or allow visible emissions of particulate matter, including fugitive dust generated from the unpaved parking lots beyond the property line within which the emissions are generated.
  - b. Permittee shall apply appropriate control measures to the disturbed unpaved parking lots as listed in PCAQCD Code §4-1-030.4.B.
  - c. Permittee shall repair and/or replace the control measures listed in PCAQCD Code §4-1-030.4.B, and shall clean-up immediately any trackout from areas accessible to the public including curbs, gutters and sidewalks when trackout extends a cumulative distance of 25 linear feet or more and at the end of the day for all other trackout.
4. Paved Public Roadway (Code §4-1-030.7)
- a. Permittee upon discovery of the mud/dirt on its property due to the trackout or erosion-caused deposition that extends 25 feet or more from the nearest unpaved surface exit onto the paved public roadway shall apply any one of the control measures listed in PCAQCD §4-1-030.7.A.i.
  - b. Permittee shall remove the mud/dirt in a manner that does not cause another source of fugitive dust.
  - c. In the event unsafe travel conditions would result from restricting traffic and removal of such material is not possible within 72 hours due to a weekend or holiday condition, the

provisions of PCAQCD Code §4-1-030.7.A.i can be extended upon notification to and approval by the Control Officer.

- d. Permittee who is the owner and/or operator of any existing paved public roadways shall apply in sufficient quantity a dust suppressants to the total surface area subject to the disturbance and prevent track by applying any one of the control measures listed in PCAQCD §4-1-030.7.A.i, prior to, during and after work on unpaved road shoulders.
- e. Permittee who is the owner and/or operator having jurisdiction over, or ownership of, public or private paved roads shall construct, or require to be constructed, all new or modified paved roads in conformance with the road shoulder width and drivable median stabilization as required in PCAQCD Code §4-1-030.7.D.
- f. Unpaved shoulders and medians of paved roads shall be considered to have control measures effectively implemented when fugitive dust emissions do not exceed 20% opacity and silt loading does not equal or exceed 0.33 oz/ft<sup>2</sup> as determined in PCAQCD Code §4-9-310 except for unpaved shoulders on which gravel has been applied. Where gravel is utilized to prevent trackout from unpaved shoulders and medians of paved roads, surface gravel shall be uniformly applied and maintained to a depth of two (2) inches to comply with the 20% opacity standards, the gravel depth and silt content test methods in PCAQCD Code §4-9-310.
- g. Permittee who is the owner and/or operator having jurisdiction over, or ownership of, existing public or private paved roads which do not conform with the requirements of PCAQCD Code §4-1-030.7.D shall reconstruct, or require to be reconstructed, the existing nonconforming paved road within 365 calendar days following the initial discovery that the road fails to meet the requirements. The control officer may require short-term stabilization of any paved road subject to the requirements set forth in PCAQCD Codes §§4-1-030.7.D and 4-1-030.7.E

5. Recordkeeping (Codes §§4-1-040 and 4-1-050)

Permittee, if subject to the above requirements, shall compile and retain records that provide evidence of control measure application including records of receipts/purchase, street sweeping, water applications, maintenance of trackout control devices, gravel pads, fences, wind barriers, tarps, type of treatment/control measure application, extent of coverage, and date applied. The supporting documentation shall be provided as soon as possible but no later than 48 hours upon a verbal or written request by the Control Officer, excluding weekends. If the Control Officer is at the site where requested records are kept, the records shall be provided without delay. Copies of such records shall be retained for at least two years.

- J. General Maintenance Obligation [*Currently federally enforceable; 40 CFR 63.6605*] (Code §§3-1-081.E., 8-1-030.A.3)

At all times, including periods of start-up, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate the permitted facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.

#### 4. Compliance Demonstration

- A. Performance Tests – Thermal Oxidizer (TO)

1. Initial Thermal Oxidizer (TO) Performance Testing

Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but no later than 180 days after initial startup of such facility, the owner or operator shall conduct the performance tests on the TOs for the clay polishing and filtration system and water evaporators to quantify VOCs and HAPs emissions using standard approved EPA test methods or equivalent test methods as approved by the District. All the performance tests shall be run at the maximum practical production load possible.

2. Oil Heater Performance Testing

Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but no later than 180 days after initial startup of such facility, the owner or operator shall conduct the performance test on the oil heater to determine the destruction and removal efficiency. All the performance tests shall be run at the maximum practical production load possible.

3. Test Protocol

Test protocols shall be submitted to the District at least thirty (30) days prior to the test.

4. Performance Test Notice

Notice of any performance test required by this permit shall be submitted to the District at least thirty days (30) days prior to running the test.

5. Test Report

A copy of each test report shall be submitted to the District for approval within forty-five (45) days after the test. The test report shall indicate:

- a. VOCs emission rates in pounds/hour, as well as in tons per year.
- b. HAPs (combined & single) emission rates in pounds/hour, as well as in tons per year.
- c. VOCs and HAPs destruction efficiency.

6. Subsequent Performance Tests

If the results of the initial tests show compliance with the permit requirements and limits, subsequent tests shall be performed within five (5) years of the previous performance tests. If the results show violation of the permit requirements, then the tests shall be conducted on an annual basis, until compliance is achieved, at that point the permittee may resume testing every five years.

B. Feedstock Testing (Code §§3-1-160 & 3-1-170)

Permittee shall perform the following tests to ensure the consistency of each shipment:

1. The American Petroleum Institute (API) Gravity Test - The acceptable API gravity range shall be between 20 and 34.
2. Basic Sediment and Water (BS&W) Test - The acceptable water limit on used oil shall be a maximum of 8%.

3. Chloride Screen Test - The acceptable test shall be if the chlorine lab test paper dipped in the feedstock sample does not change color.

C. Monitoring Standards of Performance for Storage Vessels for Petroleum Liquids (Code §5-18-742.E)

The monitoring of operations required by §3.E of this permit is as follows:

1. The owner or operator of any petroleum liquid storage vessel to which §3.E of this permits applies shall for each storage vessel maintain a file of each type of petroleum liquid store, of the typical Reid vapor pressure of each type of petroleum liquid stored and of dates of storage. Dates on which the storage vessel is empty shall be shown.
2. The owner or operator of any petroleum liquid storage vessel to which §3.E of this permit applies shall for such storage vessel determine and record average monthly storage temperature and true vapor pressure of the petroleum liquid stored at such temperature if either:
  - a. The petroleum liquid has a true vapor pressure, as stored, greater than 26 mm Hg (0.5 psia) but less than 78 mm Hg (1.5 psia) and is stored in a storage vessel other than one equipped with a floating roof, a vapor recovery system or their equivalents; or
  - b. The petroleum liquid has a true vapor pressure, as stored, greater than 470 mm Hg (9.1 psia) and is stored in a storage vessel other than one equipped with a vapor recovery system or its equivalent.
3. 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 temperatures determined at least once every seven days.

D. Regular Emissions Monitoring (Code §3-1-081)

1. Leak Detection and Repair Plan (LDAR)
  - a. Within 60 days of the issuance of this permit, Permittee shall submit a LDAR Plan to identify the steps involved to rectify the situation when a leak is detected from any piece of equipment. Permittee shall revise the LDAR Plan upon the request of the Department and whenever substantive changes are made to the equipment or plan, in accordance with the Department guidelines.
  - b. The LDAR Plan shall specify key system operating parameters, such as temperatures, pressures and/or flow rates, necessary to determine compliance and describe in detail procedures to maintain the approved LDAR Plan. The Permittee shall monitor, operate and maintain the equipment in accordance with the device's approved LDAR Plan.
  - c. Changes to an existing LDAR Plan shall be made by submitting a complete, revised LDAR Plan along with a cover letter identifying all changes and the reason for such changes. Permittee may implement the changes addressed in the revised LDAR plan after it submits the revision to the Department. Unless disapproved in writing by the Department, the Permittee shall continue to operate in accordance with the revised LDAR plan.
2. Corrective Action Plan

- a. If any equipment is found to be operating outside a specified range, Permittee shall immediately take corrective action to bring the device back into the specified operating range or shut down the device and the associated equipment.
- b. If a pattern of excursions, as determined by the Department or the Permittee, of operation outside the specified operating range develops, Permittee shall submit for Department approval a Corrective Action Plan to bring the devices back into the specified operating range. The Plan shall be submitted to the Department within 30 days of the determination of the existence of excursions.

3. Used Oil processing Plan [*Currently federally enforceable; 40 CFR 279.55*]

Owners or operators of used oil processing and re-refining facilities must develop and follow a written analysis plan describing the procedures that will be used to comply with the analysis requirements of §279.53 and, if applicable §279.72. The owner or operator must keep the plan at the facility.

4. Feedstock Acceptance Specifications [*Currently federally enforceable; 40 CFR 279.53, 279.55, 279.56 & 279.72*]

- a. Permittee shall accept only on-specification used oil which meets the following specifications:

Constituent / Property	Allowable Level
PCBs	Less than 2 ppm
Total Halogens	1000 ppm or less
Water	Less than 8%

- b. Permittee shall keep a record of each used oil shipment accepted for processing/re-refining. These records may take the form of a log, invoice, manifest, bill of lading or other shipping documents. Records for each shipment must include the following information:
  - i. The name and address of the transporter who delivered the used oil to the processor/re-refiner;
  - ii. The name and address of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining;
  - iii. The EPA identification number of the transporter who delivered the used oil to the processor/re-refiner;
  - iv. The EPA identification number (if applicable) of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining;
  - v. The quantity of used oil accepted; and
  - vi. The date of acceptance.

- c. Permittee will only receive and/or process oily water that is demonstrated to be non-hazardous by EPA standards. Water received or processed must meet the following specifications :

<b>RCRA-8</b>	<b>EPA Hazardous Waste Code</b>	<b>EPA Limit</b>
Arsenic	D004	5 ppm or less
Barium	D005	100 ppm or less
Cadmium	D006	1 ppm or less
Chromium	D007	5 ppm or less
Lead	D008	5 ppm or less
Mercury	D009	0.2 ppm or less
Selenium	D010	1 ppm or less
Silver	D011	5 ppm of less

- d. Permittee shall keep a record of each shipment of used oil that is shipped to a used oil burner, processor/ re-refiner, or disposal facility. These records may take the form of a log, invoice, manifest, bill of lading or other shipping documents. Records for each shipment must include the following information:
- i. The name and address of the transporter who delivers the used oil to the burner, processor/re-refiner or disposal facility;
  - ii. The name and address of the burner, processor/re-refiner or disposal facility who will receive the used oil;
  - iii. The EPA identification number of the transporter who delivers the used oil to the burner, processor/re-refiner or disposal facility;
  - iv. The EPA identification number of the burner, processor/re-refiner, or disposal facility who will receive the used oil;
  - v. The quantity of used oil shipped; and
  - vi. The date of shipment.
- e. Record retention. The records described in paragraphs (a) and (b) of this section must be maintained for at least three years.
- f. Used oil that is to be burned for energy recovery, or Materials produced from used oil that are burned for energy recovery (e.g., gasoline and diesel blendstocks) must meet the following specifications:

<b>Constituent / Property</b>	<b>Allowable Level</b>
Arsenic	Less than 5 ppm
Cadmium	Less than 2 ppm
Chromium	Less than 10 ppm
Lead	Less than 100 ppm
Flash Point	100° F or more
PCBs	Less than 2 ppm
Total Halogens	1000 ppm or less

5. Non-instrumental Emissions Monitoring - Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs) (Code §§3-1-081.A.4, 3-1-083)

a. Material Records

As a surrogate means to monitor emissions of volatile organic compounds and hazardous air pollutants, permittee shall maintain monthly records of the following:

- i. Used oil processed through the facility.
- ii. Lube oil railcar loading
- iii. Lube oil truck loading
- iv. Asphalt railcar loading
- v. Asphalt truck loading
- vi. Diesel blendstock truck loading
- vii. Gasoline blendstock truck loading
- viii. Certificate of Analysis of each shipment of the used oil feedstock
- ix. Used oil or materials produced from used oil that are burned for energy recovery.
- x. Permittee shall keep records of the receipt of any of the shipment that was not acceptable and records of how the shipment was handled.

b. On-specification Used Oil Records

Permittee shall maintain, on-site, records of the fuel analysis supplied by the marketer for each batch of on-specification used oil fuel, and shall be responsible for ensuring that the results of the analysis confirm that the contaminant levels specified in Section §4.B.3.a of this permit are not exceeded.



## c. Feedstock Test Records

Permittee shall maintain, on-site, records of the three tests performed on each shipment of the feedstock as required under Section §4.B of this permit. The records shall clearly indicate the following:

- i. Result of the API Gravity test.
- ii. Result of the BS&W test
- iii. Result of the chlorine test.
- iv. Records of the shipment failing the test.
- v. Records of the steps taken to dispose of the failed shipment.

## d. Equipment Inspection Records

Monthly records of inspection and any maintenance of storage tanks, valves, pump seals, connectors, flanges, open-ended lines shall be maintained.

e. Hours of Operation Records<sup>1</sup>

Permittee shall record the number of hours that the facility was in operation.

## f. Laboratory Test Results Records

Permittee shall submit every year along with the emissions report, laboratory test results clearly indicating the highest influent concentration in parts per million by volume for that year.

## 6. Non-instrumental Emissions Calculations - Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs) (Code §§3-1-081.A.4, 3-1-083)

Permittee shall use the following calculation methods to determine VOC and HAP emissions from each stage of the process:

- a. Fugitive emissions (FUG-01) from the valves, pump seals, connectors, flanges and open-ended lines shall be calculated using EPA's Refinery Average Emission Factors, Table 2-2 from the Document Protocol for Equipment Leak Emission Estimates (EPA-453/R-93-026, June 1993).
- b. Loading emissions (TL-01, TL-02, TL-03, TL-04, TL-05, TL-06, TL-07, TL-08, RL-01, RL-02) shall be calculated using the following equation from EPA's AP-42 Chapter, Transportation and Marketing of Petroleum Liquids (Section 5.2.2.1.1, Loading Losses)

$$L_L = (12.46 *SPM)/T$$

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<sup>1</sup>Hours of operation are based on time in which the equipment contains material. Even if a process unit is shutdown, if the equipment contains material, then the shutdown time must be included in the hours of operation.

Where: S = saturation factor  
 P = true vapor pressure of liquid loaded (psia)  
 M = molecular weight of vapors (lb/lb-mole)  
 T = temperature of bulk liquid, °R (°F+460)

- c. Storage tank emissions (TK-1001, TK-1002, TK-1003, TK-1004, TK-1005, TK-1006, TK-1007, TK-1008, TK-1009, TK-1010, TK-501, TK-502) shall be calculated using EPA's Tanks 4.09d program.

7. Non-instrumental Emissions Calculations – Nitrogen Oxides (NO<sub>x</sub>) (Code §§3-1-081.A.4, 3-1-083)

As a surrogate means of monitor emissions of nitrogen oxides, permittee shall maintain monthly records of the natural gas purchased for the boiler and the hot oil heater, as well as a record of all used oil derivatives burned for energy.

8. General Housekeeping/Odor Control

- a. Solid covers shall be installed on the dry wells/sump locations around process units to reduce the possibility of the odors coming from the collection of the oily water collected during rain.
- b. Rubber gaskets/seals shall be installed on the oil totes to reduce the possibility of any vapors escaping from the totes containing oil from the parts under maintenance.

E. Recordkeeping [*Federally enforceable provision, pursuant to Code §3-1-084 (8/11/94)*] (Code §3-1-083)

Permittee shall maintain records of:

1. All information required pursuant to any federally enforceable provision of this permit, recorded in a permanent form suitable for inspection.
2. The occurrence and duration of any start-up, shutdown or malfunction in the operation of the permitted facility or any air pollution control equipment. For purposes of this provision, a "shut-down" means a cessation of operations at the entire facility for more than seven days, and a "start-up" constitutes the reactivation of the facility after a "shut-down."

F. Compliance Reporting [*Federally enforceable provision, pursuant to Code §3-1-084 (8/11/94)*] (Code §3-1-083.A)

In order to demonstrate compliance with the provisions of this permit, the Permittee shall submit a semi-annual report containing a summary of the information required to be recorded pursuant to this permit, which summary shall clearly show that permittee has complied with the operational and emissions limitations under this permit. All instances of deviations from permit requirements shall be clearly identified in such reports. For brevity, such deviation reports may incorporate by reference any written supplemental upset reports filed by permittee during the reporting period. The report shall be submitted to the District within 30 days after the end of each calendar half. Appendix A of this permit is a form which may be used for the report.

G. Annual Regular Compliance/Compliance Progress Certification (Code §3-1-083.A.4.)

Permittee shall annually submit a certification of compliance with the provisions of this permit. The certification shall:

1. Be signed by a responsible official, namely the proprietor, a general partner, the president, secretary, treasurer or vice-president of the corporation, or such other person as may be approved by the Control Officer as an administrative amendment to this permit;
2. Identify each term or condition of the permit that is the basis of the certification;
3. Verify the compliance status with respect to each such term or condition;
4. Verify whether compliance with respect to each such term or condition has been continuous or intermittent;
5. Identify the permit provision, or other, compliance mechanism upon which the certification is based; and
6. Be postmarked within thirty (30) days of the start of each calendar year.

## 5. Other Reporting Obligations

- A. Deviations from Permit Requirements *[Federally Enforceable Provision pursuant to code §3-1-081.A.5.b (9/5/01) approved as a SIP element at 66 FR 63166 (12/5/01)]* ~~(Code §3-1-081.A.5.b.)~~

Permittee shall report any deviation from the requirements of this permit along with the probable cause for such deviation, and any corrective actions or preventative measures taken to the District within ten days of the earlier of date the Permittee learned, or should have learned, of the deviation unless earlier notification is required by the provisions of this permit.

- B. Annual Emissions Inventory *[Federally enforceable provision pursuant to §3-1-103.C (2/22/95) approved as a SIP element at 65 FR79742 (12/2/00)]* ~~[Code §3-1-103. (Nov. '93)]~~

Permittee shall complete and submit to the District an annual emissions inventory, disclosing actual emissions for the preceding calendar year. Submittal of the form set forth in Appendix A of this permit fulfills this requirement.

## 6. Fee Payment (Code §3-7-600)

As an essential obligation under this permit, a permit fee shall be assessed by the District and paid by Permittee in accord with the provisions of Code Chapter 3, Article 7, as they may exist at the time the fee is due. The permit fee shall be due annually on or before the anniversary date of the issuance of an individual permit, or formal grant of approval to operate under a general permit, or at such other time as may be designated now or hereafter by rule. The District will notify the Permittee of the amount to be due, as well as the specific date on which the fee is due.

## 7. General Conditions

- A. Term (Code §3-1-089)

This permit shall have a term of five (5) years, measured from the date of issuance.

- B. Basic Obligation (Code §3-1-081.)

Permittee shall operate in compliance with all conditions of this permit, the Pinal County Air Quality Control District ("the District") Code of Regulations ("Code"), and all State and Federal laws, statutes, and codes relating to air quality that apply to these facilities. Any permit noncompliance is grounds for

enforcement action; for a permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application and may additionally constitute a violation of the CAA.

C. Duty to Supplement Application (Code §§3-1-050.H., 3-1-081.A.8.e., 3-1-087.A.1.c., 3-1-110.)

Even after the issuance of this permit, a Permittee, who as an applicant who failed to include all relevant facts, or who submitted incorrect information in an application, shall, upon becoming aware of such failure or incorrect submittal, promptly submit a supplement to the application, correcting such failure or incorrect submittal. In addition, Permittee shall furnish to the District within thirty days any information that the Control Officer may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit and/or the Code.

D. Right to Enter (Code §§ 3-1-132, 8-1-050)

Authorized representatives of the District shall, upon presentation of proper credentials and a showing that the District representative is equipped with certain safety equipment, namely a hard hat, be allowed:

1. To enter upon the premises where the source is located or in which any records are required to be kept under the terms and conditions of this permit;
2. To inspect any equipment, operation, or method required in this permit; and
3. To sample emissions from the source.

E. Transfer of Ownership (Code §3-1-090)

This permit may be transferred from one person to another by notifying the District at least 30 days in advance of the transfer. The notice shall contain all the information and items required by Code § 3-1-090. The transfer may take place if not denied by the District within 10 days of the receipt of the transfer notification.

F. Posting of Permit (Code §3-1-100)

Permittee shall firmly affix the permit, an approved facsimile of the permit, or other approved identification bearing the permit number, upon such building, structure, facility or installation for which the permit was issued. In the event that such building, structure, facility or installation is so constructed or operated that the permit cannot be so placed, the permit shall be mounted so as to be clearly visible in an accessible place within a reasonable distance of the equipment or maintained readily available at all times on the operating premises.

G. Permit Revocation for Cause (Code §3-1-140)

The Director of the District ("Director") may revoke this permit for cause, which cause shall include occurrence of any of the following:

1. The Director has reasonable cause to believe that the permit was obtained by fraud or material misrepresentation;
2. Permittee failed to disclose a material fact required by the permit application form or a regulation applicable to the permit;
3. The terms and conditions of the permit have been or are being violated.

H. Certification of Truth, Accuracy, and Completeness (Code § 3-1-175.)

Any application form, report, or compliance certification submitted pursuant to the Code shall contain certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under Chapter 3 of the Code shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

I. Permit Expiration and Renewal (Code §3-1-089)

Expiration of this permit will terminate the facility's right to operate unless a timely application for renewal has been submitted in accordance with §§3-1-050, 3-1-055 and 3-1-060, or a substitute application for general permit under §3-5-490 is submitted. For Class I permit renewals, a timely application is one that is submitted at least 6 months, but not greater than 18 months prior to the date of permit expiration. For Class II or Class III permit renewals, a timely application is one that is submitted at least 3 months, but not greater than 12 months prior to the date of permit expiration.

J. Severability (Code §3-1-081.A.7)

The provisions of this permit are severable, and if any provision of this permit is held invalid the remainder of this permit shall not be affected thereby.

K. Permit Shield (Code § 3-1-102.)

1. Compliance with the terms of this permit shall be deemed compliance with any applicable requirement identified in this permit.
2. 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.

L. Permit Revisions (Code Chapter 3, Article 2)

1. This permit may be revised, reopened, revoked and reissued, or terminated for cause. Other than as expressly provided in Code Chapter 3, Article 2, the filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
2. The permittee shall furnish to the Control Officer, within a reasonable time, any information that the Control officer 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.
3. Permit amendments, permit revisions, and changes made without a permit revision shall conform to the requirements in Article 2, Chapter 3, of the Code.
4. Should this source become subject to a standard promulgated by the Administrator pursuant to CAA §112(d), then 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. (Code §3-1-050.C.5)
5. Revision to Permit Provisions Designated as Federally Enforceable Pursuant to Code §3-1-084 ***[Federally enforceable provision, pursuant to Code §3-1-084 (8/11/94)]***

As an express condition of preserving the federal enforceability of any provision of this permit designated "federally enforceable" pursuant to Code §3-1-084, Permittee shall not make any facility allowed change that would contravene such provision, until thirty (30) days after the Permittee has previously furnished notice of the proposed change to the District and to the Administrator, to thereby allow the Administrator opportunity to comment upon the continued "federal enforceability" of the subject provision after the proposed change.

M. Permit Re-opening (Code §3-1-087.)

1. This permit shall be reopened if either:
  - a. The Control Officer determines that it contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of it;
  - b. The Control Officer determines that it needs to be revised or revoked to assure compliance with the applicable requirements; or
  - c. The EPA makes a material objection to any of those federally enforceable designations under Code §3-1-084 after the normal EPA review period is ended.
2. If this permit must be reopened or revised, the District will notify the permittee in accord with Code §3-1-087.A.3.

N. Record Retention (Code §3-1-083.A.2.b)

Permittee shall retain for a period of five (5) years all documents required under this permit, including reports, monitoring data, support information, calibration and maintenance records, and all original recordings or physical records of required continuous monitoring instrumentation.

O. Scope of License Conferred (Code §3-1-081.)

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

P. Excess Emission Reports; Emergency Provision (Code §3-1-081.E, Code §8-1-030)

1. To the extent Permittee may wish to offer a showing in mitigation of any potential penalty, underlying upset events resulting in excess emissions shall reported as follows:
  - a. The permittee shall report to the Control Officer any emissions in excess of the limits established by this permit. Such report shall be in two parts:
    - i. Notifications by telephone or facsimile within 24 hours or the next business day, whichever is later, of the time when the owner or operator first learned of the occurrence of excess emissions, including all available information required under subparagraph b. below.
    - ii. Detailed written notification within 3 working days of the initial occurrence containing the information required under subparagraph b. below.
  - b. The excess emissions report shall contain the following information:

- i. The identity of each stack or other emission point where the excess emissions occurred.
  - ii. The magnitude of the excess emissions expressed in the units of the applicable limitation.
  - iii. The time and duration or expected duration of the excess emissions.
  - iv. The identity of the equipment from which the excess emissions occurred.
  - v. The 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.
  - vii. The steps that were or are being taken to limit the excess emissions. To the extent this permit defines procedures governing operations during periods of start-up or malfunction, the report shall contain a list of steps taken to comply with this permit.
  - viii. To the extent excess emissions are continuous or recurring, the initial notification shall include an estimate of the time the excess emissions will continue. Continued excess emissions beyond the estimated date will require an additional notification.
2. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires 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.
3. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of the following subparagraph are met.
4. 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 at the time being properly operated;
  - c. During the period of 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 Control Officer by certified mail or hand delivery within 2 working days of the time when emissions limitations were exceeded due to emergency. The notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective action taken.

**8. Facility Specific Data****A. Equipment**

Equipment for which emissions are allowed by this permit are as follows:

1. 1 – 10,000 bbl used oil storage tank (TK-1010)
2. 1 - 5,000 bbl used oil storage tank (TK-1009)
3. 1 - 1,000 bbl used oil storage tank (TK-1008)
4. 1 – 1,000 bbl used oil storage tank (TK-007)
5. 1 - 10,000 bbl Light Vacuum Gas Oil (LVGO) storage tank (TK-1011)
6. 1 - 1,000 bbl Light Vacuum Gas Oil (LVGO) storage tank (TK-1003)
7. 1 - 1,000 bbl Heavy Vacuum Gas Oil (HVGO) storage tank (TK-1004)
8. 1 - 5,000 bbl Heavy Vacuum Gas Oil (HVGO) storage tank (TK-1012)
9. 1 - 1,000 bbl asphalt storage tank (TK-1005)
10. 1 - 1,000 bbl asphalt storage tank (TK-1006)
11. 1 - 1,000 bbl IFR naphtha storage tank (TK-1001)
12. 1 - 1,000 bbl diesel storage tank (TK-1002)
13. 1 - 500 bbl produced water storage tank (TK-501)
14. 1 – 500 bbl produced water storage tank (TK-502)
15. Lube oil railcar loading (RL-01)
16. Asphalt railcar loading (RL-02)
17. Used oil truck off-loading (TO-01)
18. Naphtha truck loading (TL-01)
19. Diesel blendstock truck loading (TL-02)
20. Asphalt truck loading (TL-04)
21. Lube oil truck loading (TL-03 -TL-05)
22. Site fugitives (FUG-01)
23. 8.0 MM Btu/hr hot oil heater (H-400)
24. 8.0 MM Btu/Hr natural gas fired boiler (H-950)



25. Clay polishing & filtration system (V-135-155)

26. 4 – 4.0 MMBtu/hr. wastewater evaporators (W-100)

B. Emission Inventory Table (This table is for informational purpose only)

<b>ID</b>	<b>Source</b>	<b>Pollutants</b>	<b>Emission Rate (Tons/Yr.)</b>
1	Storage Tanks Emissions and Loading Emissions	Volatile Organic Compounds (VOCs)	4.3
2	Site-wide Fugitive Emissions	Volatile Organic Compounds (VOCs)	27.4
3	Boiler	Nitrogen Oxides (NO <sub>x</sub> )	3.1
		Carbon Monoxide (CO)	13.0
		Sulfur Dioxide (SO <sub>x</sub> )	2.5
		Volatile Organic Compounds (VOCs)	0.8
4	Hot Oil Heater	Nitrogen Oxides (NO <sub>x</sub> )	1.4
		Carbon Monoxide (CO)	1.2
		Sulfur Dioxide (SO <sub>x</sub> )	1.1
5	Clay Polishing System	Nitrogen Oxides (NO <sub>x</sub> )	3.0
		Sulfur Dioxide (SO <sub>x</sub> )	8.9
		Volatile Organic Compounds (VOCs)	0.09
		Hazardous Air Pollutants (HAPs)	0.08
6	Water Evaporators	Nitrogen Oxides (NO <sub>x</sub> )	26.2
		Sulfur Dioxide (SO <sub>x</sub> )	25.7
		Volatile Organic Compounds (VOCs)	0.23
		Hazardous Air Pollutants (HAPs)	0.17

**Appendix A**

**Semi-annual Report**

**Permit ~~B31265.R01~~ B31428.000**

**Abstract**

This constitutes a semi-annual report, documenting emissions and use of emission-generating materials during the subject reporting period.

**Facility** - Sheffield Lubricants LLC  
Sheffield Lubricants Lube Oil Plant  
Central Arizona Commerce Park, Casa Grande, AZ

**Reporting Period** - January-June - \_\_\_\_\_ or July-December- \_\_\_\_\_ Year \_\_\_\_\_

**Material Report**

Used oil processed through the facility - \_\_\_\_\_ gallons

Lube oil railcar loading - \_\_\_\_\_ gallons

Lube oil truck loading - \_\_\_\_\_ gallons

Asphalt railcar loading - \_\_\_\_\_ gallons

Asphalt truck loading - \_\_\_\_\_ gallons

Diesel blendstock truck loading - \_\_\_\_\_ gallons

Naphtha blendstock truck loading - \_\_\_\_\_ gallons

Total natural gas purchased - \_\_\_\_\_ therms (from bills)

**Operational Hours**

Total operational hours of the facility - \_\_\_\_\_ hours

**Emissions Report**

Total fugitive VOC/HAP emissions - \_\_\_\_\_ tons

Total loading VOC/HAP emissions - \_\_\_\_\_ tons

Total storage tank VOC/HAP emissions - \_\_\_\_\_ tons

Highest fixed laboratory influent concentration - \_\_\_\_\_ ppmv (submit lab test results as specified in Section §4.B.4.f of this permit)

Average destruction efficiency - \_\_\_\_\_ percent

Lowest destruction efficiency measured - \_\_\_\_\_ percent.

**Compliance Report**

Were the tests performed as required under Section §4.A of this permit?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please list the date of the most recent performance tests? \_\_\_\_\_

Did the feedstock pass all the three tests? Yes \_\_\_\_\_ No \_\_\_\_\_

Were the appropriate controls installed on the petroleum storage vessels as required by §3.E of this permit?

Yes \_\_\_\_\_ No \_\_\_\_\_

Were monitoring operations of the petroleum storage vessels performed, as required by §4.C of this permit?

Yes \_\_\_\_\_ No \_\_\_\_\_

Was a Leak Detection and Repair (LDAR) Plan submitted to the department as required under Section §4.D.1 of this permit?

Yes \_\_\_\_\_ No \_\_\_\_\_

If no, please provide the reason below:

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Was a Corrective Action Plan for equipment failure followed as required under Section §4.D.2 of this permit?

Yes \_\_\_\_\_ No \_\_\_\_\_ N/A \_\_\_\_\_

If no, please provide the reason below:

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Was a written used oil processing plan developed, followed, and maintained as required in Section §4.D.3 of this permit?

Yes \_\_\_\_\_ No \_\_\_\_\_

If no, please provide the reason below:

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Did the feedstock meet the specifications of on-spec oil as listed under Section §4.D.4 of this permit?  
 Yes \_\_\_\_\_ No \_\_\_\_\_

Were the records of each used oil shipment maintained as required in Section §4.D.4.b of this permit?  
 Yes \_\_\_\_\_ No \_\_\_\_\_

Did the processed water meet the specifications listed in Section §4.D.4.c of this permit?  
 Yes \_\_\_\_\_ No \_\_\_\_\_

Were records of used oil shipment maintained and retained as required in Sections §§4.D.4.d and 4.D.4.e of this permit?  
 Yes \_\_\_\_\_ No \_\_\_\_\_

Did the material burnt for energy recovery meet the specifications listed in Section §4.D.4.f of this permit?  
 Yes \_\_\_\_\_ No \_\_\_\_\_

Were all the records maintained as required under Sections §§4.D.5-7 of this permit?      Yes \_\_\_\_\_ No \_\_\_\_\_

Were the general housekeeping requirements to control odors maintained as required in Section §4.D.8 of this permit?  
 Yes \_\_\_\_\_ No \_\_\_\_\_

**Certification by Responsible Official**

I certify that, based on information and belief formed after reasonable inquiry, that the statements and information in this report are true, accurate and complete.

Name \_\_\_\_\_

Signed \_\_\_\_\_

Title \_\_\_\_\_

Date \_\_\_\_\_

Contact Phone Number \_\_\_\_\_

**Email to:**           complinacereports@pinal.gov, or

**Mail to:**            Pinal County Air Quality Control District  
                           P.O. Box 987  
                           Florence, AZ 85132