

# Air Quality General Permits

## Maricopa County (Phoenix), Arizona

**Jamie Wilson**  
Permitting Supervisor



Maricopa County  
Air Quality Department



WALK MORE USE CFLS MORE CARPOOL MORE  
BIKE MORE RAKE MORE TELECOMMUTE  
MORE DRIVE HYBRIDS MORE CONSOLIDATE  
ERRANDS MORE RIDE PUBLIC TRANSPORTATION  
MORE USE ENERGY EFFICIENT APPLIANCES  
MORE CARRY REUSABLE TOTE BAGS MORE  
CONSIDER SOLAR MORE RUN COLD WATER  
CYCLES MORE USE REUSABLE CONTAINERS  
MORE CONSERVE ELECTRICITY MORE REDUCE  
WOODBURNING MORE RECYCLE MORE USE  
ELECTRIC LAWN AND GARDEN EQUIPMENT  
MORE REFUEL AFTER DARK MORE RIDE  
THE BUS MORE RIDE THE LIGHT RAIL MORE  
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**MAKE**  
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## *Jurisdictional Facts*

- Three counties in Arizona have air quality departments:
  - Maricopa (metro Phoenix and surrounding area)
  - Pima (Tucson)
  - Pinal (immediately south of Phoenix)
- Navajo Nation is delegated and has treatment as a state
- The State of Arizona has air jurisdiction over the remainder of the state (except other tribal lands)



## *Jurisdictional Facts*

- Unique regulatory environment
  - State statute requires that county air quality regulations are substantially similar to the state's
  - Notable SIP gap
- PSD-delegated
- Last, but certainly not least:
  - **Maricopa County is located in EPA Region 9**



## County Statistics

- Population: 4 million people
  - 4<sup>th</sup> most populous county in the U.S.
  - Greater than the populations of 24 states
  - 65% of the population of Arizona resides in Maricopa County
- Land Area: 9,222 square miles
  - 14<sup>th</sup> largest county in the U.S.
  - Only 29% of the land area is privately owned
  - Federal government (BLM, USFS) owns 39%
  - State and public ownership is 27%
  - 5% is Indian land
- Two Class I areas in the County alone; dozen statewide



## *Nonattainment Status*

- Ozone: Subpart 1 (basic) nonattainment
  - Metro Phoenix plus part of Pinal County
  - 100 tpy major source threshold for VOC and NO<sub>x</sub>
  - Re-designation to moderate is likely
- PM<sub>10</sub>: nonattainment (not entire County)
  - 70 tpy major source threshold
  - Failed 12/31/06 attainment deadline; 5% plan in place
- New Source Review: using pre-Reform rules
  - Past actual to future potential test



## Permitting Structure: Thresholds

- Relatively low permitting thresholds
- A permit is required if:
  - Uncontrolled VOC or PM<sub>10</sub> emissions  $\geq 3$  lb/day
  - Uncontrolled emissions  $\geq 5.5$  lb/day of any other regulated pollutant
- Sources of only fugitive dust must obtain Dust Control Permits
- Stationary sources must submit Dust Control Plans for approval by the department



## Permitting Structure: Unitary Permits

- No pre-construction permits per-se
- Source is permitted as a whole, not per piece of equipment and not per process
- Source must determine whether a facility change is a major or significant modification
- New sources must obtain preconstruction approval, however
  - the preconstruction and operating permits are one and the same



## Permit Types

- Maricopa County issues three types of stationary source construction/operating (unitary) permits:
  - Title V: includes PSD, NNSR permits
  - Non-Title V: includes synthetic minor and true minor
  - General: selected source categories that can be permitted en masse due to fundamental similarities from one business to the other
- Sources that do not qualify for the limited coverage provided by a General Permit must obtain Non-Title V permits





## *General Permits: Introduction*

- Currently 6 source categories of true minor sources are able to obtain coverage under a general permit:
  - Dry Cleaning
  - Fuel Burning
  - Vehicle & Mobile Equipment Refinishing
  - Surface Coating Operations
  - Gasoline Fuel Dispensing
  - Graphic Arts



## *General Permits: Facilities*

- About 3,000 sources have general permits
- Gasoline Dispensing Facilities make up the largest group
- Overall, most General Permits are issued to “mom and pop” types of operations
- Frequent changes of ownership can present challenges to permitting AND enforcement
- Language barriers sometimes inhibit strong communication



## *General Permits: Structure*

- General Permit is drafted and publicly noticed
- At close of notice/comment period, Permit and Application are made available on the website
- All sources currently under that General Permit are mailed the new application and permit
- Sources obtain an “Authority to Operate,” or ATO under the general permit



## *General Permits: Implications*

- General Permits are written to cover likely types of operations at a source category, such as solvent cleaners at vehicle refinishing shops
- Processes at a source that are not included in the general permit trigger a Non-Title V permit instead, such as a woodworking shop associated with a gas station that is located at a vocational school



## General Permits: Implementation

- Many owner/operators do not have an understanding of the rules or regulations
- General permits for true minor sources can't cover every scenario; seemingly routine activities at a source type could require an engineering review and a different permit type
- Each general permit is issued for a 5-year term no matter when an individual ATO is granted: renewals can cause a significant workload issue



## General Permits: Compliance

- Identifying the “one-off” situations during the application review process can be tricky
  - Compliance must identify off-permit equipment
  - Must tell the source they have the “wrong” permit
- Lack of regulatory understanding leads to a lot of education of the regulated industry
- How many people with general permits would you say actually *read* their permit requirements?

*Hint: In our experience, not many!*



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MORE CONSIDER SOLAR  
REDUCE WOODBURNING  
MORE RIDE THE BUS MORE

## *General Permits: Outreach*

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- With a significant change, hold workshops.
- For dry cleaners, a Korean translator held a dedicated workshop. Feedback was overwhelmingly positive.
- Permit engineers and permit techs take countless phone calls from concerned owners when a revised application/permit is sent out.



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## General Permits: MACTs

- One challenge we face is the promulgation of numerous extensive area source MACTs
  - Must re-open our general permits to include requirements; creates a double workload during the permit term
  - Many sources that have been unpermitted now affected
  - Some small businesses have trouble with the existing permit, so the MACT requirements must be make extremely approachable and almost automatic
    - For example, provide an initial notification form that must be submitted with the permit application





## Overview & Possibilities

- Title V general permits: landfills?
- Look to other jurisdictions to refine process
- Additional source categories as more area source MACTs are promulgated
- Expand applicability of general permits to capture greater number of sources? Pluses and minuses must be considered.



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