Tucson Iron & Metal Custom Incineration

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January 5, 2021

Roshni Brahmbhatt
Manager Air Enforcement Office
Enforcement and Compliance Assurance Division
U.S. EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105-3901

Tucson Iron and Metal (TIM)
PDEQ Air Permit No. 127 / NSPS EEEE
TIM Information
Tucson, Pima County, Arizona

Dear Ms. Brahmbhatt:

Tucson Iron & Metal (TIM) is providing response to the U.S, EPA Region 9 request for information to be used to determine TIM's contraband incineration unit compliance status with regard to requirements of the New Source Performance Standard (NSPS) for Other Solid Waste Incineration (OSWI) Units for Which Construction Commenced After December 9, 2004 or for Which Modification or Reconstruction is Commenced on or After June 16, 2006 (40 CFR Part 60, Subpart EEEE). TIM understands that the EPA Administrator is requesting information under section 114(a) of the federal Clean Air Act (CAA) and has delegated authority to request such information to the manager for EPA's Region 9 Air Enforcement Office, Enforcement and Compliance Assurance Division.

NSPS Subpart EEEE, section 60.2951, requires reports as listed in Table 4 to Subpart EEEE of Part 60 - Summary of Reporting Requirements. The reporting requirements include (1) a preconstruction report, (2) startup notification, (3) an initial test report, (4) an annual report, (5) an emission limitation or operating limit deviation report, (6) a qualified operator deviation notification, (7) a qualified operator deviation status report and (8) a qualified operator deviation notification of resumed operation. These provisions were all met when applicable.

In accordance with TIM's request for extension dated December 16, 2020, TIM is providing the responses to EPA's request for information for Appendix C, Items 3, 4, 5, 7b, 7d, 9, 10, 11 and 12 within the original 30 calendar day deadline of Monday, January 11, 2021. Responses are provided below.

3. Provide the February 2005 Minor Permit Revision submitted to the Pima County Department of Environmental Quality (PDEQ).

TIM Response: The February 2005 Minor Permit Revision Application and the Revised Permit are provided as Appendix 3-1 and Appendix 3-2, respectively.

4. For each continuous emission monitoring system (CEMS) Relative Accuracy Test Audit (RATA) conducted form February 2017 to the present, state the date(s) the RATA was conducted and provide the RATA final test report(s).

TIM Response: CEMS Relative Accuracy Test Audits (RATAs) were conducted on February 7, 2017; July 24, 2018; April 23, 2019; August 12, 2020; and September 10, 2020. Reports are provided as Appendices 4-1, 4-2, 4-3, 4-4, and 4-5, respectively.

5. For each CEMS RATA that TIM initiated from April 2019 to the present but did not complete or for which a final report was not prepared, state the date(s) TIM initiated the RATA(s) and provide all documentation showing the results of each RATA.

TIM Response: TIM did not initiate any RATA from April 2019 that was not completed. The RATAs conducted from April 2019 were conducted on April 23, 2019; August 12, 2020, and September 10, 2020. All were completed, and final reports are provided in response to Item 4.

7. On December 11, 2019, PDEQ Inspector Rogers conducted an inspection at the TIM facility. Inspector Rogers noted the following item observed during the inspection in his inspection report:

    b. For December 11, 2019 incineration activity, provide the incinerator charge rate and contraband feed type, and provide all supporting documentation.

TIM Response: The incinerator charge rate was 1375 pounds per hour. The contraband feed was a combination of marijuana, methamphetamine, paper, burlap, fabric, and associated wrapping. The Tucson Furnace Contraband Incineration Log and Daily Operator's Log are provided as Appendix 7b.

    d. Provide the secondary combustion chamber (afterburner) temperature records for the duration of the incineration activity (from startup prior to shutdown, as defined in 40 CFR 60 §60.2977) conducted on December 11, 2019 as required by Section 3, Condition 52.c and Attachment 4, Section V.C of PDEQ Class I Permit issued on March 26,2018.

TIM Response: The afterburner temperature chart is included as page 8 of the December 11, 2019 daily burn paperwork, included in Appendix 7b.

9. For September 9-10, 2020 emission testing, conducted by Bison Engineering Inc., provide the following OSWI parametric data for those days: 1) incinerator charge rate (reported in pounds per hour), 2) contraband feed type, and 3) sorbent feed rate (reported in pounds per hour).

TIM Response:
The parametric data for September 9, 2020 was

1) Incinerator Charge Rate: 947 pounds per hour
2) Contraband feed type: Marijuana, cocaine, methamphetamine, paper, and associated wrapping
3) Sorbent feed rate: 100 pounds per hour

The parametric data for September 10, 2020 was

1) Incinerator Charge Rate: 796 pounds per hour
2) Contraband feed type: Marijuana, cocaine, methamphetamine, and associated wrapping
3) Sorbent feed rate: 100 pounds per hour

10. Provide the operating parameter data, as specified in EPA's letter dated September 27, 2016, for TIM's most recent incineration activity, including: 1) incinerator charge rate, 2) incinerator secondary combustion chamber temperature data, 3) sorbent feed rate, 4) carbon monoxide and oxygen CEMS data and 5) contraband feed type.

TIM Response: The most recent incineration activity was on December 9, 2020. The incinerator charge rate was 1375 pounds per hour; the sorbent feed rate was 100 pounds per hour, and the contraband feed type was marijuana and associated wrapping. The secondary combustion chamber temperature data and carbon monoxide and oxygen CEMS data cannot be easily summarized, and so TIM is enclosing the Daily Operator's Log and accompanying daily burn paperwork for December 9, 2020 as Appendix 10

11. Provide a schedule of anticipated incineration events from the date of December 11, 2020 through December 31, 2021. If anticipated incineration is not scheduled that far in advance, state how far in advance anticipated incineration events are scheduled.

TIM Response: Anticipated incineration events are scheduled for:

December 18, 2020
January 8, 2021
January 26, 2021
January 28, 2021
January 29, 2021
February 25, 2021
March 5, 2021
March 17, 2021
March 18, 2021
March 26, 2021
March 30, 2021
May 7, 2021 - Tentative
May 25, 2021 - Tentative
May 28, 2021 – Tentative
June 8, 2021 - Tentative
July 9, 2021 - Tentative
July 30, 2021 - Tentative
August 10, 2021 - Tentative
September 3, 2021 – Tentative
September 24, 2021 – Tentative
December 14, 2021 - Tentative

12. Provide the most recent contraband contracts or agreements with U.S. Drug Enforcement Administration and U.S. Customs and Border Patrol.

TIM Response: The contracts with US Customs and Border Patrol – El Paso and US Customs and Border Patrol – Tucson/Nogales are attached as Appendix 12-1 and 12-2, respectively. Pricing information has been redacted as Confidential Business Information (CBI). TIM is not currently under contract with U.S. Drug Enforcement Administration (DEA). The contract with DEA El Paso expired February 19, 2019 and the contract with DEA Tucson expired March 31, 2020. Both agencies still burn their contraband with TIM on an intermittent, as-needed basis.

I certify that I am fully authorized by Tucson Iron & Metal to provide the above information on its behalf to EPA.

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act, 42 U.S.C. § 7413(c)(2), and 18 U.S.C. §§ 1001 and 1341.

If you have any questions or require additional information, please contact me at 520-884-1554.

Sincerely,

Gary Kippur, Vice President
January 5, 2021

Enclosures: Appendix 3-1, Appendix 3-2, Appendix 4-1, Appendix 4-2, Appendix 4-3, Appendix 4-4, Appendix 4-5, Appendix 7b, Appendix 10

cc: Mr. Rupesh Patel, Air Permits Manager
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Tucson, Arizona 85701-1429

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APPENDIX

ATTACHMENTS