



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

**75 Hawthorne Street
San Francisco, CA 94105-3901**

June 16, 2008

Ursula Kramer
Director
Pima County Department of Environmental Quality
150 W. Congress Street
Tucson, Arizona 85701-1317

Dear Ms. Kramer:

We received your May 23, 2008, request for delegation of Standards of Performance for New Stationary Sources (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP) pursuant to the Code of Federal Regulations, Title 40, (40 CFR) Parts 60 and 63. In this letter, we are responding only to your request for delegation of 40 CFR Part 63 NESHAP. You will receive a separate letter addressing delegation of 40 CFR Part 60 NSPS.

In response to your request, the U.S. Environmental Protection Agency, Region IX, (EPA) hereby grants to the Pima County Department of Environmental Quality (PDEQ) formal delegation of the following 40 CFR Part 63 NESHAP, as they existed on February 1, 2008:

- Subpart J – NESHAP for Polyvinyl Chloride and Copolymers Production
- Subpart MM – NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfitic, and Stand-Alone Semicemical Pulp Mills
- Subpart XX – National Emission Standards for Ethylene Manufacturing Process Units: Heat Exchange Systems and Waste Operations
- Subpart DDDD – NESHAP: Plywood and Composite Wood Products
- Subpart WWWW – National Emission Standards for Hospital Ethylene Oxide Sterilizers
- Subpart YYYYY – NESHAP for Area Sources: Electric Arc Furnace Steelmaking Facilities
- Subpart ZZZZZ – NESHAP for Iron and Steel Foundries Area Sources
- Subpart BBBB – NESHAP for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities
- Subpart CCCCC – NESHAP for Source Category: Gasoline Dispensing Facilities
- Subpart DDDDD – NESHAP for Polyvinyl Chloride and Copolymers Production Area Sources
- Subpart EEEEE – NESHAP for Primary Copper Smelting Area Sources
- Subpart FFFFF – NESHAP for Secondary Copper Smelting Area Sources
- Subpart GGGGG – NESHAP for Primary Nonferrous Metals Area Sources – Zinc, Cadmium, and Beryllium
- Subpart HHHHH – NESHAP: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources
- Subpart LLLLL – NESHAP for Acrylic and Modacrylic Fibers Production Area Sources
- Subpart MMMMM – NESHAP for Carbon Black Production Area Sources
- Subpart NNNNN – NESHAP for Chemical Manufacturing Area Sources: Chromium Compounds

Subpart OOOOOO – NESHAP for Flexible Polyurethane Foam Production and Fabrication Area Sources

Subpart PPPPPP – NESHAP for Lead Acid Battery Manufacturing Area Sources

Subpart QQQQQQ – NESHAP for Wood Preserving Area Sources

Subpart RRRRRR – NESHAP for Clay Ceramics Manufacturing Area Sources

Subpart SSSSSS – NESHAP for Glass Manufacturing Area Sources

Subpart TTTTTT – NESHAP for Secondary Nonferrous Metals Processing Area Sources

Regarding any other 40 CFR Part 63 standards previously delegated to PDEQ, this letter is also delegating any amendments made to those standards as of February 1, 2008. These delegations are being granted in accordance with the February 3, 1999, Memorandum of Agreement (MOA) between PDEQ and EPA regarding the delegation of NESHAP. As set forth in the MOA, these delegations are effective upon the date of this letter and EPA will publish a future Federal Register notice to codify these delegations into the Code of Federal Regulations.

We appreciate PDEQ's efforts to implement the federal air toxics program and hope to continue working with you to reduce emissions of air toxics in Pima County. If you have any questions about this delegation, please call me at (415) 947-8715 or have your staff contact Mae Wang at (415) 947-4124.

Sincerely,



Deborah Jordan
Director, Air Division

cc: Richard Grimaldi, PDEQ