

**PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY
TECHNICAL PROCEDURE**

POLICY NO.: Technical Procedure, TECH-210

EFFECTIVE DATE: July 2, 2002

POLICY: RULE INTERPRETATION, TITLE 17 OF THE PIMA COUNTY CODE (PCC)
In order to provide the public with a consistent interpretation of Title 17 of the Pima County Code, Department staff shall adhere to the following procedure when assessing the applicability of PCC §17.16.165.J.

PURPOSE: The purpose of this technical policy is to ensure consistent application of the rule throughout all Department Divisions.

PROCEDURE: When assessing the applicability of rule 17.16.165.J in permitting or enforcement, the rule shall only be applicable if the companion rule at 17.16.165.I has been determined to be applicable.

JUSTIFICATION: For a permittee to comply with PCC §17.16.165.J, it is necessary that a continuous opacity monitoring system, with an appropriate data recording and handling system, be installed and operated. Without such a system, a permittee's only recourse is to have an individual continuously conducting Method 9 tests on the plume or effluent and calculating 6-minute averages every 15 seconds. That would clearly be an unnecessary and burdensome requirement that could not have been intended by the original rule writers. It seems apparent that PCC §17.16.165.J should be considered in conjunction with PCC §17.16.165.I. As PCC §17.16.165.I requires the installation of a continuous monitoring system for measuring opacity under certain circumstances, it would then be reasonable to require reporting under PCC §17.16.165.J.

APPROVED BY:

Ursula Kramer
Director

Date

Original Policy Approved: July 2, 2002
Date(s) Revised: