



PURPOSE

The purpose of this BMP is to establish proper procedures for the review of all modifications to existing operations for determining whether or not a modification to Freeport-McMoRan Morenci Inc (Morenci) air quality permit is required for the project. Under Arizona's air permit program a modification consists of any physical or operational change that would increase emissions. An increase in emissions associated with an expansion to existing operations will always trigger either a minor modification or a significant modification depending on the increase in the amount of emissions associated with the project. Determining the type of permit required is based on the pollutant's significance level. Pollutants and the significance level for the pollutants most likely to be encountered at Morenci are as follows:

POLLUTANT	QUANTITY (tons/year)
Particulate Matter < 10 microns (PM ₁₀)	15
Particulate Matter (PT)	25
Sulfur Dioxide (SO ₂)	40
Nitrous Oxides (NO _x)	40
Volatile Organic Compounds (VOC)	40
Acid Mist (H ₂ SO ₄)	7
Carbon Monoxide (CO)	100

SCOPE

Environmental Services will:

- Review all proposed or planned modifications to existing operations to determine whether or not the process is regulated by an air quality permit and whether the changes will require a permit modification.
- Review all Appropriation Requests to ensure that no equipment or expansions, regulated by an air quality permit, are approved without revising the current Air Permit.
- Prepare of all applications for revision to the air quality permit.
- Track all emissions increases/decreases to ensure that significance levels are not exceeded.

All Divisions:

All divisions are responsible for informing the Environmental Services Department and the Engineering Department of all proposed or planned modifications to operations that could influence the existing air emission status at Morenci. The MOC process must be followed

PROCEDURE

GENERAL GUIDELINES

As part of the planning and review process for future changes or expansions at Morenci that have the potential to increase emissions, the Environmental Services Department is to be contacted and involved in the project. The Environmental Services Department will make a determination of whether a permit modification will be needed. Modifications or expansions that may require an air permit modification include but are not limited to the following areas:

- IPCC system
- IOS
- Mobile screening plant
- Reclaim conveyor belts
- Crushing plants
- Concentrators
- SX/EW
- Powerhouses
- Diesel generators
- Concrete batch plants
- Research and Assay activities
- Gasoline Tanks

Upon being notified of a modification that will increase emissions the Environmental Services Department will review the modification and determine the feasibility of permitting the activity. Modifications increasing emissions greater than the significance level may not be feasible unless emissions from other sources can be decreased. Once a modification is determined to be feasible, environmental services will write the air permit modification application and obtain the appropriate approval from Arizona Department of Environmental Quality (ADEQ).

EMPLOYEE TRAINING

No specific training required for this BMP

QUESTIONS OR NEED HELP? CONTACT ENVIRONMENTAL SERVICES



FREEMPORT-McMORAN
MORENCI INC

ENVIRONMENTAL BEST MANAGEMENT PRACTICE
BMP No. 102
Physical/Operational Modifications
Review For Air Permit Applicability
