

CLARK COUNTY
DEPARTMENT OF AIR QUALITY
AND ENVIRONMENTAL MANAGEMENT
500 South Grand Central Parkway, Box 555210, Las Vegas, Nevada 89155
Authority to Construct Permit for Part 70 Source
Source: 482
Issued in accordance with the
Clark County Air Quality Regulations (AQR)

ISSUED TO: **MasterBrand Cabinets, Inc.**
3645 Losee Road
North Las Vegas, Nevada 89030

SOURCE: **MasterBrand Cabinets, Inc.**
3645 Losee Road
North Las Vegas, Nevada 89030
T20S, R61E, Section 11
Hydrographic Basin Number: 212

NATURE OF BUSINESS:
SIC Code 2434: Wood Kitchen Cabinets
NAICS Code 337110: Wood Kitchen Cabinets and Countertop Manufacturing

RESPONSIBLE OFFICIAL:
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Permit Issuance: **June 16, 2011**

ISSUED BY: CLARK COUNTY DEPARTMENT OF AIR QUALITY AND ENVIRONMENTAL MANAGEMENT



Richard Beckstead
Permitting Manager, Clark County DAQEM

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I. ACRONYMS

Table I-1: List of Acronyms

Acronym	Term
AQR	Clark County Air Quality Regulations
BCC	Clark County Board of County Commissioners
BHP	Brake Horse Power
CE	Control Efficiency
CEMS	Continuous Emissions Monitoring System
CF	Control Factor
CFR	United States Code of Federal Regulations
CO	Carbon Monoxide
CPI	Urban Consumer Price Index
DAQEM	Clark County Department of Air Quality & Environmental Management
DEM	Digital Elevation Model
EF	Emission Factor
EO	Executive Order
EPA	United States Environmental Protection Agency
EU	Emission Unit
EVR	Enhanced Vapor Recovery
GDO	Gasoline Dispensing Operation
HAP	Hazardous Air Pollutant
HHV	High Heating Value
HP	Horse Power
HVLP	High Volume, Low Pressure
kW	kiloWatt
LON	Letter of Noncompliance
MMBtu	Millions of British Thermal Units
NEI	Net Emission Increase
NO _x	Nitrogen Oxides
NOV	Notice of Violation
NRS	Nevada Revised Statutes
NSPS	New Source Performance Standards
NSR	New Source Review
OP	Operating Permit
PAL	Plantwide Applicability Limit
PEP	Potential to Emit Particulate
PM _{2.5}	Particulate Matter less than 2.5 microns
PM ₁₀	Particulate Matter less than 10 microns
ppm	Parts per Million
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
scf	Standard Cubic Feet
SCC	Source Classification Codes
SCR	Selective Catalytic Reduction
SIP	State Implementation Plan
SO _x	Sulfur Oxides
TCS	Toxic Chemical Substance
TSD	Technical Support Document
USGS	United States Geological Survey
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound

II. ADMINISTRATIVE CONDITIONS

A. GENERAL REQUIREMENTS

- a. This Authority to Construct Permit (ATC) does not modify, consolidate, supersede, or replace any ATC previously issued for this facility.
- b. This ATC does not supersede or replace any Part 70 Operating Permit (OP) requirements, including any permit conditions, compliance requirements and/or emission limitations outlined in the Part 70 OP.
- c. No person shall begin actual construction of a new Part 70 source, or modify or reconstruct an existing Part 70 source that falls within the preconstruction review applicability criteria, without first obtaining an ATC from the Control Officer. *[AQR 12.4.1.1(a)]*
- d. The Permittee shall post the permit in a location which is clearly visible and accessible to the facility's employees and representatives of the department. *[AQR 12.4.3.1(e) (16) and AQR 12.13]*
- e. The Permittee shall commence the construction, modification, or reconstruction of this source within eighteen (18) months after the date of issuance of this ATC and construction shall not be discontinued for a period greater than twelve (12) months. *[AQR 12.4.1.1(b)]*
- f. The Permittee shall submit an application for a Part 70 OP within twelve (12) months after commencing operation. If the source submits a timely application under this condition, it may continue operating under its ATC until final action is taken on its application for a new Part 70 OP. *[AQR 12.4.1.1(b) and AQR 12.5.2.1(a)(1)]*
- g. The Permittee shall submit an application for a Part 70 OP within twelve (12) months after commencing operation of the modification or reconstruction authorized by the ATC, or on or before such earlier date that the Control Officer may establish. However, where an existing Part 70 OP would prohibit such construction or change in operation, the source must obtain a Part 70 OP revision before commencing operation. *[AQR 12.5.2.1(a)(3)]*
- h. Notwithstanding the provisions of requirement 10, if an existing Part 70 OP would prohibit such construction or change in operation, the source must obtain a Part 70 OP revision pursuant to Section 12.5.2.14 before commencing operation. *[AQR 12.4.1.1(c)].*
- i. This ATC does not convey any property rights or any exclusive privilege. *[AQR 12.4.3.1(e)(6)]*
- j. The Permittee shall pay all fees assessed pursuant to AQR Section 18. *[AQR 12.4.3.1(e)(17)]*

B. MODIFICATION, REVISION, RENEWAL REQUIREMENTS

- a. The Permittee shall file an application for any change in the Responsible Official of the source and may implement the change immediately upon submittal of the request. *[AQR 12.4.3.4(a)(1)(D) and AQR 12.4.3.4(a)(2)(C)]*
- b. The Permittee shall file an application for a transfer of ownership at least 30 days prior to the date of a change in ownership or operational control of the source and

such application shall constitute a temporary ATC under the conditions of the existing permit. [AQR 12.12.2(c) and (d)]

- c. The Control Officer may revise, revoke and re-issue, re-open and revise, or terminate the permit for cause. [AQR 12.4.3.1 (e)(5)]
- d. The Control Officer reserves the right, upon reasonable cause, to modify existing conditions and impose additional new compliance, monitoring and control requirements. [AQR 12.4.3.1(e)(10)(B) and (C)]

C. REPORTING/NOTIFICATIONS/PROVIDING INFORMANTION REQUIREMENTS

- a. The Permittee shall report start of construction, construction interruptions exceeding nine (9) months, and completion of construction to the Control Officer in writing not later than fifteen (15) working days after occurrence of the event. [AQR 12.4.3.1(e)(12)]
- b. The Permittee shall provide written notification of the actual date of commencing operation, received by the Control Officer, within fifteen (15) calendar days after such date. [AQR 12.4.3.1(e)(13)]
- c. The Permittee shall provide separate written notification for commencing operation for each unit of phased construction, which may involve a series of units commencing operation at different times. [AQR 12.4.3.1(e)(14)]
- d. The Permittee shall retain records of all required monitoring and performance demonstration data and supporting information for five (5) years after the date of the sample collection, measurement, report, or analysis. Supporting information includes all records regarding calibration and maintenance of the monitoring equipment, all original strip-chart recordings for continuous monitoring instrumentation, and if applicable, all other records required to be maintained pursuant to 40 CFR 64.9(b). [AQR 12.4.3.1(e)(1)]
- e. The Permittee shall allow the Control Officer or any authorized representative of the Control Officer upon presentation of credentials to enter the permittee's premises where the source is located or emissions related activity is conducted to: [AQR 12.4.3.1(e)(8)]
 - a. Have access to and copy during normal business hours any records that are kept pursuant to the conditions of the permit;
 - b. Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices or operations regulated or required under this permit;
 - c. Sample or monitor substances or parameters to determine compliance with the conditions of the permit or applicable requirements; and
 - d. Document alleged violations using devices such as cameras or video equipment.
- f. The Permittee shall provide the Control Officer, within a reasonable time, with any information that the Control Officer requests in writing to determine whether cause exists for revising, revoking and re-issuance or terminating the permit, or to determine compliance with the conditions of the permit. Upon request the Permittee shall also furnish to the Control Officer copies of any records required to be kept by the permit, or for information claimed to be confidential, the Permittee may furnish such records directly to the Administrator along with a claim of confidentiality. [AQR 12.4.3.1(e)(7)]

D. COMPLIANCE REQUIREMENTS

- a. The Permittee shall comply with all conditions contained in this ATC. Any noncompliance constitutes a violation and is grounds for an action for non-compliance, revocation and re-issuance or the termination of the permit by the Control Officer, or the re-opening or revising of the permit by the Permittee as directed by the Control Officer. *[AQR 12.4.3.1(e)(3)]*
- b. Each of the conditions and requirements of this permit are severable and if any are held invalid, the remaining conditions and requirements continue in effect. *[AQR 12.4.3.1(e)(2)]*
- c. The need to halt or reduce activity to maintain compliance with the conditions of the permit is not a defense to noncompliance with any condition of the permit. *[AQR 12.4.3.1(e)(4)]*
- d. The Permittee shall promptly report to the Control Officer (500 Grand Central Parkway, Box 555210, Las Vegas, NV 89155) upon the commencement of operation deviations from permit requirements, including those attributable to malfunction, startup, or shut-down. All reports of deviations shall identify the probable cause of the deviations and any corrective actions or preventative measures taken. *[AQR 12.5.2.6(d)(4)(B) and (C)]*
- e. A responsible official of the source shall certify that, based on information and belief formed after a reasonable inquiry, the statements made in any document required to be submitted by any condition of the permit are true, accurate, and complete. *[AQR 12.4.3.1(e)(9)]*

III. SOURCE-WIDE PTE SUMMARY

1. MasterBrand Company, Inc. is a major source for VOC; and a synthetic minor source for HAP; and a minor source for PM₁₀, NO_x, CO, and SO_x, as summarized in Table III-1:

Table III-1: Source-wide PTE (tons per year)

Pollutant	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
Source Totals	10.98	3.83	3.22	0.04	58.24	24.44
Major Source Thresholds	70	100	100	100	100	25¹

¹25 tons for combination of all HAPs (no single HAP exceeds 10 tons).

IV. EMISSION UNITS AND APPLICABLE REQUIREMENTS

A. EMISSION UNITS

1. The emission units covered by this ATC are summarized in Table IV-A-1.

Table IV-A-1: List of Emission Units

EU	Description	Rating	Make	Model No.	Serial No.
A14	Paint Spray Paint Booth	10.500 cfm	Dry Filter Crossflow	IFPG-1278-RM	0001100
A16	Paint Spray Paint Booth	10.500 cfm	Dry Filter Crossflow	IFPG-1278-RM	TBD
B12	Natural Gas Air Heater	1.1 MMBtu/hr	TBD	TBD	TBD

B. EMISSION LIMITATIONS AND STANDARDS

1. Emission Limits

- a. Neither the actual nor the allowable emissions from each emission unit shall exceed the calculated PTE listed in Table IV-B-1.

Table IV-B-1: Emission Unit PTE (tons per year)

EU	Conditions	Rating	PM ₁₀	NO _x	CO	SO _x	VOC ¹	HAP ¹
All Spraying Booths	8,760 hr/yr	Varies	0.92	0.00	0.00	0.00	58.00	24.40
			0.92	0.00	0.00	0.00		
B12	8,760 hr/year	1.1 MMBtu/hr	0.04	0.47	0.40	0.01	0.03	0.01

¹ VOC and HAP, including volatile organic HAPs (VHAPs) emission limits are listed as a part of the source-wide limit for all spray booths, the average values and can vary depending on the production rate of the spray booth.

- b. Neither the actual nor the allowable emissions from the use of VOC and HAP containing materials used for coating applications shall exceed the calculated PTE listed in Table IV-B-2.

Table IV-B-2: Source Emission Limitations for Wood Cabinet Coating Operations

Regulated Air Pollutant	Tons/Year
VOCs	58.00
HAPs	24.40
Single HAP	9.44

- c. The Permittee shall meet VHAP emission limitations given in Table IV-B-3 [40 CFR 63, Subpart JJ]:

Table IV-B-3: Summary of Emission Limits – Part 63, Subpart JJ

Emission Point	Emission Limits
Finishing Operations:	
(a) Achieve a weighted average VHAP content across all coatings (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied)	1.0 ¹
(b) Use compliant finishing materials (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied):	
—stains	1.0 ¹
—washcoats	1.0 ^{1,2}
—sealers	1.0 ¹
—topcoats	1.0 ¹
—basecoats	1.0 ^{1,2}
—enamels	1.0 ^{1,2}
—thinners (maximum percent VHAP allowable); or	10
(c) As an alternative, use control device; or	1.0 ³
(d) Use any combination of (a), (b), and (c)	1.0
Cleaning Operations:	
Strippable spray booth material (maximum VOC content, kg VOC/kg solids [lb VOC/lb solids])	0.8
Contact Adhesives:	
(a) Use compliant contact adhesives (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied) based on following criteria:	
i. For aerosol adhesives, and for contact adhesives applied to nonporous substrates	NA ⁴
ii. For foam adhesives used in products that meet flammability requirements	1.8
iii. For all other contact adhesives (including foam adhesives used in products that do not meet flammability requirements); or	1.0
(b) Use a control device	1.0 ⁵

¹ The limits refer to the VHAP content of the coating, as applied.

² Washcoats, basecoats, and enamels must comply with the limits presented in this table if they are purchased premade, that is, if they are not formulated onsite by thinning other finishing materials. If they are formulated onsite, they must be formulated using compliant finishing materials, i.e., those that meet the limits specified in this table, and thinners containing no more than 3.0 percent VHAP by weight.

³ The control device must operate at an efficiency that is equivalent to no greater than 1.0 kilogram (or 0.8 kilogram) of VHAP being emitted from the affected emission source per kilogram of solids used.

⁴ There is no limit on the VHAP content of these adhesives.

⁵ The control device must operate at an efficiency that is equivalent to no greater than 1.0 kilogram (or 0.2 kilogram) of VHAP being emitted from the affected emission source per kilogram of solids used. Source: [60 FR 62936, Dec. 7, 1995, as amended at 62 FR 30260, June 3, 1997]

- d. The Permittee shall limit VHAP emissions from finishing operations by meeting the emission limitations presented in Table IV-B-3. [40 CFR 63.802]

- e. The Permittee shall limit HAP emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 kg VOC/kg solids (0.8 lb VOC/lb solids), as applied. *[40 CFR 63.802]*
- f. The Permittee shall not discharge into the atmosphere, from any emission unit, any air contaminant in excess of an average of 20 percent opacity for a period of more than 6 consecutive minutes. *[AQR 26.1.1]*

2. Production Limits

- a. The Permittee shall limit the production throughput of various wood cabinet coating materials so that the actual emissions of VOCs and HAPs (including VHAPs) will not exceed the permitted emission limits listed in Tables IV-B-1 and IV-B-2. (This condition shall not be effective until such time as it has been incorporated into the Part 70 Operating Permit.)

3. Emission Controls

- a. The Permittee shall not operate spray booth unless all exhaust air passes through appropriate filter media. The dry filter media must cover all filtering area of the spray booth.
- b. The Permittee shall operate all emission control equipment according to manufacturer's recommendations. Dry filters associated with the spray booths' dust collection system must be changed at sufficient intervals to prevent a decrease in their effectiveness, and to prevent them from clogging.
- c. The Permittee shall not use the cleaning and wash-off solvents that contain any of the pollutants listed in Table 4 of the 40 CFR 63, Subpart JJ, in concentrations subject to MSDS reporting as required by OSHA. *[40 CFR 63.803]*
- d. The Permittee shall use a manometer (or equivalent) to monitor the pressure drop across the spray booth filters. The filters should be replaced when the pressure drop exceeds 0.25 inches of water (6.35 millimeters of water) unless the manufacturer's recommendations for use indicate a different pressure drop value.
- e. The Permittee shall use normally closed containers for storing finishing, gluing, cleaning, and wash-off materials. *[40 CFR 63.803]*
- f. The Permittee shall use conventional air spray guns to apply finishing materials only under any of the following circumstances *[40 CFR 63.803]*:
 - i. to apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;
 - ii. for touchup and repair under the following conditions:
 - i. the touchup and repair occurs after completion of the finishing operation; or
 - ii. the touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touch up and repair are applied from a container that has a volume of no more than 2.0 gallons.
 - iii. when spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;

- iv. when emissions from the finishing application station are directed to a control device;
- v. the conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or
- vi. the conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other type of spray application technology. The Permittee shall demonstrate technical or economical infeasibility by submitting to the Control Officer a video, a technical report, or other documentation that supports the Permittee's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the Permittee's claim of technical or economic infeasibility:
 - i. the production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or
 - ii. the excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.
- g. The Permittee shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container. *[40 CRF 63.803]*
- h. The Permittee shall collect all organic HAP solvent used to clean spray guns into a normally closed container. *[40 CRF 63.803]*
- i. The Permittee shall control emissions from wash-off operations by *[40 CRF 63.803]*:
 - i. using normally closed tanks for wash-off; and
 - ii. minimizing dripping by tilting or rotating the part to drain as much solvent as possible.
- j. The Permittee shall not discharge from any source whatsoever quantities of air contaminants or other material which cause a nuisance, such as over spray or excessive odors from the spray painting booth. *[AQR 12.4.3.1(e)]*
- k. The Permittee must comply with control requirements contained in this section. If there is inconsistency between standards or requirements, the most stringent standard or requirement shall apply. *[AQR 12.4.3.1(e)]*

C. MONITORING

1. The Permittee is required to comply with the compliance demonstration requirements of 40 CFR 63, Subpart JJ. *[AQR 12.5.2.6(d)]*
2. The Permittee shall inspect daily the spray booths and all ancillary equipment for leaks, malfunctions, pressure drop and proper operation of gauges. A daily log must be kept of such inspections. The log must also show any discrepancies, and record the steps taken to correct them.
3. The Permittee shall comply with the monitoring requirements by using any of the methods presented below *[40 CRF 63.804]*:
 - a. Calculate the average VHAP content for all finishing materials used by the Permittee using Equation 1 and maintain a value of E no greater than 1.0:

$$E = \frac{(M_{c1}C_{c1} + M_{c2}C_{c2} + \dots + M_{cn}C_{cn} + S_1W_1 + S_2W_2 + \dots + S_nW_n)}{(M_{c1} + M_{c2} + \dots + M_{cn})} \text{ Equation 1}$$

Where

C_c = the VHAP content of a finishing material (c), in kilograms of volatile hazardous air pollutants per kilogram of coating solids (kg VHAP/kg solids), as supplied. Also given in pounds of volatile hazardous air pollutants per pound of coating solids (lb VHAP/lb solids).

M = the mass of solids in finishing material used monthly, kg solids/month (lb solids/month).

S = the VHAP content of a solvent, expressed as a weight fraction, added to finishing materials.

W = the amount of solvent, in kilograms (pounds), added to finishing materials during the monthly averaging period.

- b. use compliant finishing materials according to the following criteria:
 - i. demonstrate that each stain, sealer, and topcoat has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids) as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for coating and thinner;
 - ii. demonstrate that each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids) as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for coating and thinner; and
 - iii. demonstrate that each washcoat, basecoat, and enamel that is formulated by the Permittee is formulated using a finishing material containing no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids) and thinner containing no more than 3.0 percent VHAP by weight.
 - c. the Permittee can use any combination of the averaging approach, as described in IV-C-2-a, and use any combination of compliant materials as described in IV-C-2-b.
4. The Permittee shall demonstrate continuous compliance with the monitoring requirements by submitting the results of the averaging calculation (Equation 1) for each month within each quarter and submitting a compliance certification with the quarterly reports [40 CFR 63.804]:
- a. the compliance certification shall state that the value of (E), as calculated by Equation 1, is no greater than 1.0. The Permittee is in violation of the standard if E is greater than 1.0 for any month. A violation of the monthly average is a separate violation of the standard for each day of operation during the month, unless the Permittee can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period; or

- b. the compliance certification shall state that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners as applicable, have been used each day in the quarterly reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. The Permittee is in violation of the permit whenever a noncompliant coating, as demonstrated by the records or a sample of the coating, is used.
 - c. the compliance certification shall be signed by the responsible official.
5. The Permittee shall demonstrate continuous compliance when applying coatings using continuous coaters by following the procedures below [40 CFR 63.804]:
 - a. using compliant coatings, as determined by the VHAP content of the coating in the reservoir and the VHAP content as calculated from records, using compliant thinners, and submitting a compliance certification with the required quarterly reports:
 - i. the compliance certification shall state that compliant coatings have been used each day in the quarterly reporting period, or should otherwise identify the days of noncompliance and the reasons for noncompliance. The Permittee is in violation of the permit whenever a noncompliant coating, as demonstrated by the records or a sample of the coating, is used. Use of a noncompliant coating is a separate violation for each day the noncompliant coating is used.
 - ii. the compliance certification shall be signed by the responsible official.
 - b. using compliant coatings, as determined by the VHAP content of the coating in the reservoir, using compliant thinners, maintaining a viscosity of the coating in the reservoir that is no less than the viscosity of the initial coating by monitoring the viscosity with a viscosity meter or by testing the viscosity of the initial coating and retesting the coating in the reservoir each time solvent is added, maintaining records of solvent addition and submitting a compliance certification with the quarterly report:
 - i. the compliance certification shall state that compliant coatings, as determined by the VHAP content of the coating in the reservoir, have been used each day in the quarterly reporting period. Additionally, the certification shall state that the viscosity of the coating in the reservoir has not been less than the viscosity of the initial coating, that is, the coating that is initially mixed and placed in the reservoir, for any day in the quarterly reporting period.
 - ii. the compliance certification shall be signed by the responsible official.
 - iii. the Permittee is in violation of the permit when a sample of the as-applied coating exceeds the applicable limit of 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as determined using EPA Method 311, or the viscosity of the coating in the reservoir is less than the viscosity of the initial coating.
6. During days when the plant is operating, on-site personnel shall observe operations at least once, and more often as necessary, and shall investigate any occurrence of visible fugitive emissions. Corrective action shall be immediately taken to correct causes of fugitive dust in excess of allowable opacity limits. [AQR 12.5.2.6(d)]

7. The Permittee shall demonstrate compliance with the daily visible emission observation requirements maintaining a log that documents at least, the dates and time when opacity observations are taken and the steps taken to make any needed corrections to bring opacity into compliance. [AQR 12.5.2.6(d)]
8. The Permittee shall demonstrate compliance with the opacity limitation on a monthly basis in accordance with 40 CFR 60 Appendix A Method 22 (Visual determination of fugitive emissions). The observations should be made for a period of 6 minutes in order to confirm that no visible emissions are present. If visible emissions are present, compliance with the opacity limitation shall be further demonstrated in accordance with 40 CFR 60 Appendix A, Method 9 (Standards for Opacity). [AQR 12.5.2.6(d)]
9. VOC and HAP emission calculations for each coating material shall be based on the actual VOC and HAP content in the compounds used as provided by the manufacturer. [AQR 12.5.2.6(d)]
10. Compliance with the VOC emission limits shall be demonstrated by weekly emission log maintained by the Permittee. In the emission log, the Permittee shall:
 - a. record the manufacturer product number, ID, or code for all production coatings, clean-up solvents, thinners, reducers, additives, and contact cement (or adhesives) used at the facility;
 - b. record the weekly usage of all production coatings; nonexempt VOC emitting clean-up solvents, thinners, reducers, and additives; and contact cement (or adhesives) used at the source;
 - c. record the VOC content as applied of all production coatings, nonexempt VOC emitting clean-up solvents, thinners, reducers, and additives; and contact cement (or adhesives) used at the source;
 - d. calculate and record the source VOC emissions for each work week by the end of the following work week based on the following equation:
VOC (tons) = [(Coating Usage, gal) x (Coating Density, lb/gal) x (VOC Content of Coating, % by Wt.)] + [(Cleaning Solvent Usage, gal) x (Solvent Density, lb/gal)] - [(VOC Recovered, lb)]/2000 lbs/ton + VOC from B07
Where VOC Recovered is calculated as follows:
(VOC Recovered, lb) = (Clean-up Solvent and Coating Materials Recovered, gal) x (Density of Recovered Materials, lb/gal) x (VOC Content of Recovered Materials, % by Weight);
 - e. calculate and record the source VOC emissions on a calendar monthly and rolling 12-month basis by summing the weekly emissions to show compliance with the annual VOC emissions cap and the monthly VOC emissions limit; and
 - f. calculate and record the total calendar monthly and rolling 12-month source-wide VOC emissions by the end of the first week of the following calendar month.

D. TESTING

1. The Permittee shall use EPA Method 311, (40 CFR Part 63, Appendix A) in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to quantify those VHAP present in the coating. The EPA Method 311 shall then be used to quantify those VHAP identified through

formulation data. The EPA Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during the cure. *[40 CFR 63.805]*

2. The Permittee shall use the EPA Method 24 (40 CFR Part 60, Appendix A) to determine the solids content by weight and density coatings. If it is demonstrated to the satisfaction of the Control Officer that a coating does not release VOC or HAP byproducts during the cure, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted. *[40 CFR 63.805]*
3. The Permittee may request to use an alternative method for determining the VHAP content of the coating, in the event of any inconsistency between the EPA Method 24 or Method 311 test data and the Permittee's formulation data, that is, if the EPA Method 24/311 value is higher, the EPA Method 24/311 test shall govern unless after consultation, the Permittee could demonstrate that the formulation data were correct. *[40 CFR 63.805]*

E. RECORD KEEPING

1. The Permittee is required to comply with the record keeping requirements of 40 CFR 63, Subpart JJ.
2. All records and logs required by this document shall be kept by the Permittee and made available to the Control Officer for inspection immediately upon request. *[AQR 12.5.2.6(d)]*
3. All records and logs, or a copy thereof, shall be kept on site for a minimum of 5 years from the date the measurement or data was entered. *[AQR 12.5.2.6(d)]*
4. The Permittee shall maintain records on-site that require quarterly reporting and include, at a minimum *[AQR 12.5.2.6(d) and 40 CFR 63.806]*:
 - a. weekly and monthly VOC and HAP (including VHAPs) emission calculations; and
 - b. quarterly analysis of a composite paint waste sample to provide the VOC content value to be used in the VOC calculation. (This condition will only apply if the source chooses to deduct the VOC content of the waste materials shipped off-site).
5. The Permittee shall maintain records on-site that contain, at a minimum, the following information *[AQR 12.5.2.6(d) and 40 CFR 63.806]*:
 - c. records of the total weekly usage (in gallons or pounds) of each VOC and HAP containing compound (paints, basecoats, primers, reducers, thinners, solvents, etc.) shall be made available to DAQEM upon request;
 - d. records demonstrating the VHAP contents in kg VHAP/kg solid (lb VHAP/lb solids) of each compound used as coating, thinner, reducer, sealer, additive, contact adhesive, and clean-up solvent to demonstrate that the monthly and annual emissions of VHAPs do not exceed limits contained in this permit;
 - e. records demonstrating the VOC contents in kg VOC/kg solid (lb VOC/lb solids) of each compound used as coating, thinner, reducer, sealer, additive, contact adhesive, and clean-up solvent to demonstrate that the monthly and annual emissions of VOCs do not exceed limits contained in this permit;
 - f. logs of opacity observations with date and time of each observation, with any corrective action that was required;

- g. a log of Method 9 opacity observations with date and time of each observation, with any corrective action taken that was required;
 - h. a log of spray paint booth inspections; and
 - i. records of maintenance and repair; MSDS or records demonstrating the VOC and HAP content for each compound.
6. The Permittee shall maintain copies of the averaging calculation for each month following the compliance date, as well as data on the quantity of coatings and thinners used that is necessary to support the calculation of E in Equation 1. *[40 CFR 63.806]*
7. The Permittee shall maintain the following records, when applying coatings using continuous coaters *[40 CFR 63.806]*:
 - a. solvent and coating additions to the continuous coater reservoir;
 - b. viscosity measurements; and
 - c. data demonstrating that viscosity is an appropriate parameter for demonstrating compliance.
8. The Permittee shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to *[40 CFR 63.806]*:
 - a. records demonstrating that the operator training program is in place;
 - b. records collected in accordance with the inspection and maintenance plan;
 - c. records associated with the cleaning solvent accounting system;
 - d. records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each quarter;
 - e. records associated with the formulation assessment plan; and
 - f. copies of documentation such as logs developed to demonstrate that other provisions of the work practice implementation plan are followed.
9. Records and data required by this permit and maintained by Permittee may be audited, at the Permittee's expense, at any time by a third party selected by the Control Officer. *[AQR 12.5.2.6(d)]*
10. The Control Officer reserves the right to require additional requirements concerning records and record keeping for this source. *[AQR 12.5.2.6(d)]*

F. REPORTING

1. The Permittee is responsible for the notification requirements of 40 CFR 63, Subpart JJ. *[AQR 12.5.2.6(d)]*
2. All report submissions shall be addressed to the attention of the Control Officer. *[AQR 14.3, AQR 21.4, and AQR 22.4]*
3. All reports, including those related to compliance performance testing shall contain the following: *[AQR 12.5.2.6(d)]*
 - a. a certification statement on the first page, i.e., "I certify that, based on information and beliefs formed after reasonable inquiry, the statements

- contained in this document are true, accurate and complete.” (A sample form is available from DAQEM); and
- b. a certification signature from a responsible official of the company and the date certification.
4. The Permittee shall submit quarterly reports to the Control Officer. [AQR 12.5.2.6(d)]
 5. The following requirements apply to quarterly reports: [AQR 12.5.2.6(d)]
 - a. The report shall include a quarterly summary of each item listed in Section IV-E-4.
 - b. The report shall include quarterly summaries of any permit deviations, their probable cause, and corrective or preventative actions taken.
 - c. The report shall be submitted to DAQEM within 30 calendar days after the due date.
 6. The Permittee shall submit annual emissions inventory reports based on the following: [AQR 18.6.1]
 - a. The annual emissions inventory shall be submitted to DAQEM no later than March 31 after the reporting year.
 - b. The report shall include the emission factors and calculations used to determine the emissions from each permitted emission unit, even when an emission unit is not operated.
 7. The Permittee shall report to the Control Officer (500 Grand Central Parkway, Box 555210, Las Vegas, NV 89155) any upset, breakdown, malfunction, emergency or deviation which cause emissions of regulated air pollutants in excess of any limits set by regulation or by this permit. The report shall be in two parts as specified below [AQR 25.2]:
 - a. within 24 hours of the onset of the event, the report shall be communicated by phone (702) 455-5942, or by fax (702) 383-9994.
 - b. as soon as practicable but not exceeding 72 hours from notification, the detailed written report containing the information required by AQR Section 25.6.3 shall be submitted. Such reports shall include the probable cause of the excess emissions, emission calculations and any corrective actions taken.
 8. The Permittee shall report to the Control Officer deviations that do not result in excess emission, with the semi-annual reports. Such reports shall include the probable cause of deviations and any corrective actions or preventative measures taken. [AQR 12.5.2.6]
 9. Regardless of the date of issuance of this permit, the schedule for the submittal of reports to the Control Officer, shall be as outlined in Table IV-F-1 [AQR 12.5.2.6(d)]:

Table IV-F-1: Reporting Schedule

Required Report	Applicable Period	Due Date ¹
Quarterly Report for 1st Calendar Quarter	January, February, March	April 30 each year

Required Report	Applicable Period	Due Date ¹
Quarterly Report for 2nd Calendar Quarter	April, May, June	July 30 each year
Quarterly Report for 3rd Calendar Quarter	July, August, September	October 30 each year
Quarterly Report for 4th Calendar Quarter	October, November, December	January 30 each year
Annual Compliance Certification Report	12 Months	30 days after the Operating Permit issuance anniversary date
Annual Emission Inventory Report	Calendar Year	March 31 each year
Excess Emission Notification	As Required	Within 24 hours of the onset of the event
Excess Emission Report	As Required	Within 72 hours of the notification
Deviation Report without excess emission	As Required	Along with quarterly reports
Performance Testing	As Required	Within 60 days from the end of the test

¹If the due date falls on a Saturday, Sunday or a Federal or Nevada holiday, then the submittal are due on the next regularly scheduled business day.

10. The Control Officer reserves the right to require additional reports and reporting to verify compliance with permit conditions, permit requirements and requirements of applicable regulations. *[AQR 4.4 and AQR 12.5.2.6(d)]*

G. MITIGATION

1. The source is subject to federal offset requirements. *[AQR 59.1.1]*

V. OTHER REQUIREMENTS

1. The source is subject to 40 CFR 63 Subpart JJ. It is the Permittee's responsibility to know and follow all requirements within these federal regulations.
2. The Permittee shall, under all conditions, maintain and operate the source in a manner consistent with good air pollution control practice for minimizing emissions as required by 40 CFR 60.11. *[40 CFR 60.11]*